Guidelines on Human Rights Risk Assessment

THAICOM PUBLIC COMPANY LIMITED

28 April 2023

Guidelines on Human Rights Risk Assessment

1. Commitment

Thaicom Public Company Limited (the "Company") acknowledge the importance of and respect human rights as fundamental to business operation and social cohesion. The Company committed to respecting human and employment rights and treating all stakeholders fairly and equally in accordance with internationally accepted standards and those specifically relating to the Company' s business including but not limited to:

- The United Nations Universal Declaration of Human Rights (UNDHR);
- The International Labor Organization (ILO) - Declaration on Fundamental Principles and Rights at Work; and
- General Data Protection Regulation (GDPR). Please refer to AIS's Human Rights Policy.

2. Human Rights Due Diligence Process

The Company consistently and continually defines and reviews scope, identifies human rights issues and associated vulnerable groups, assesses human rights risks in its value chain, and sets up mitigation processes and remediation actions.



2.1 Scope of Human Rights Due Diligence (HRDD)

The defined scope covers:

- all activities in the Company's business value chain, concerning employees, customers, suppliers, contractors, partners, mergers, acquisitions, joint ventures, etc.; and
- potentially affected vulnerable groups, including but not limited to children, women, people with disability, migrant workers, third-party contracted labors, and local communities, etc.

2.2 Identification of human rights issues and associated vulnerable groups

The relevant Human Rights issues in the Company's business value chain for each group are addressed below. However, the relevant issues may vary from time to time depending on the changing context of the business operation.

Children: Risks from child labor include unjust use of children for labor and exploitation through the unlawful practices of employers. Child labor is an important issue that the Company considers throughout its business value chain, including the contractors and suppliers. All critical tier 1 suppliers have to

participate in self-assessment, covering child labor and other human rights risks. In addition, the company maintains a policy against employing anyone under the age of 18 years.

• Women: Women laborers remain a group vulnerable to discrimination in various forms, exploitation by employers or businesses, repressive regulations, and unequal treatment. The Company is aware of these human rights issues and maintains monitoring measures as well as policies to defend against the unjust treatment, unequal remuneration, and discrimination of women laborers throughout the business value chain.

• People with Disabilities: Common issues for persons with disabilities are access to employment opportunities, accessible workplace, unfair compensation, and ignorance about their potential at work. The Company takes these issues into consideration and implements measures to avoid oppression, employment discrimination, and unjust treatment, as well as to promote employment opportunities and proper facilities for disabled employees. The Company also pays great attention to practices in compliance with the Law on the Protection and Promotion of the Rights of Persons with Disabilities.

• Migrant Labor: Migrant workers often face many challenges including illegal employment, unfair compensation, discrimination, contract violations, and unsafe working conditions. The Company holds a strict stance against the use of illegal migrant labor and applies this policy throughout its business value chain. The Company strictly complies with relevant laws, supports the protection of their rights, and ensures safe working conditions and fair treatment.

• Third-party Contracted Labor: Human rights is an important matter that the Company must work closely with its suppliers and partners throughout the business value chain. The issues cover safety, occupational health, and work environment. Therefore, before agreeing to do business with suppliers and partners, the Company requires them to undertake a prerequisite activities and evaluations to ensure their standards of sustainability practices, in which human rights issues are included, are in line with our sustainability commitment.

• Local Communities: People in local communities could potentially be exposed to oppression such as unfair valuation as well as their health and safety issue. The Company adheres to relevant regulations and work to ensure proper measures are implemented to address local community concerns on an on-going basis.

To achieve a win-win situation under sustainability framework, the Company's investment direction and guideline for acquisitions, mergers, and joint ventures emphasize the importance of human rights, fair employment, and the compliance with relevant laws and regulations.

2.3 Human rights risk assessment

The Human Rights Risk Assessment covers identification of actual or potential human rights issues in the Company's own business operations and its business value chain, encompassing employees, customers, suppliers, contractors, business partners, mergers, acquisitions, joint ventures. The identified issues includes racial equality, nationality or religion, working condition, health and well-being, protection against unemployment, forced labor, human trafficking, child labor, equal remuneration, discrimination,

safe products and services, privacy protection and data security, grievance with communities, right to join the association, right to collective bargaining, freedom of expression and treatment of vulnerable groups including children, women, people with disability, migrants, third-party contracted labor and local communities. The Company conducts the human rights risk assessment to identify risks in the corporate level and compiles all collected information for human rights risk and mitigation reporting.

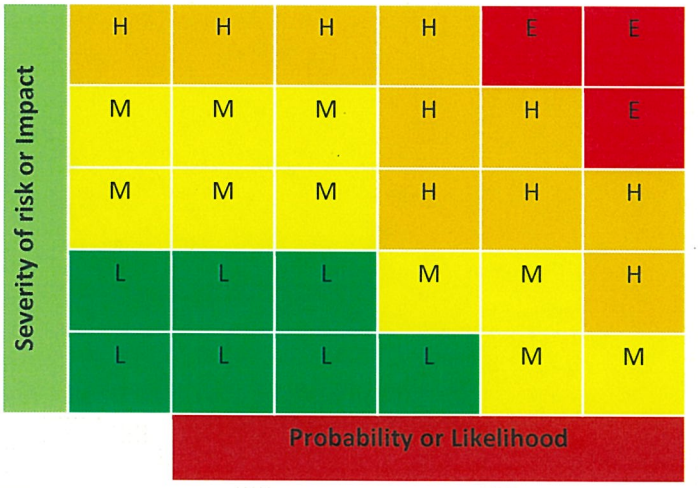
2.3.1 Review of human rights risk

The Company conducts a regular human rights risk assessment every three years covering all activities in its entire operation including the activities of its relevant partners across the value chain. The human right risk assessment, impact, and mitigation are publicly reported on an annual basis.

Additional review shall be conducted when either the current human rights risk assessment is no longer valid or if at any stage there have been significant changes to the specific activity, task, operation or legal requirements.

2.3.2 Human rights risk assessment methodology

The Company uses the risk matrix (risk map) to define the level of potential risks related to human rights issues by considering the category of probability or likelihood against the severity of risk or impact. The risk matrix is as shown in the below figure.



From the risk matrix as shown above, the risk level is categorized into 4 levels, consisting of Low, Moderate, High, and Extremely High as shown in the table below.

Risk Response		
Code	**Risk Level**	**Risk Response**
E	**Extremely High**	**Immediate actions are required;** The risk level is very high. This risk **need** to be considered in detail of immediate actions to mitigate the risk.
H	**High**	**Treatment plans shall be developed;** The risk level is high. This risk **should** be considered to develop treatment plans to mitigate the risk.
M	**Moderate**	**Existing control shall be re-examined;** The risk level is moderate. **This risk may or may not require a treatment plan** and the risk owner should **regularly examine the effectiveness** of internal existing control.
L	**Low**	**Manage by routine procedures**; The risk level is low. The risk does not require additional treatment plan but the risk owner should **regularly monitor the level of this risk.**

2.4 Human rights risk mitigation

The Company determines the mitigation measure to reduce and manage potential human rights risks or any likelihood of adverse human rights risk issues across the business value chain. In particular, in case an identified human rights risk is assessed as an Extremely High risk, immediate actions are required to mitigate the risk. In case an identified risk is assessed as a High risk, treatment plans shall be developed to mitigate the risk. No further risk treatment (mitigation) is required if the assessed (residual) risk is either Moderate or Low risk. The Company continues to regularly assess and actively monitor human rights risks and impacts, this is to ensure the appropriate mitigation measures are implemented in its business value chain.

2.5 Remediation actions

In case of human rights violations as a result of the Company's business operation, the Company provides compensation to alleviate the impact on all affected stakeholders. The amount of compensation is no lower than the rate stipulated by the law.

These guidelines were announced on 28 April 2023.

(Patompob Suwansiri)

Chief Executive Officer

Thaicom Public Company Limited