



EGCO Group

Human Rights Implementation

April 2021

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Business benefits of addressing human rights

EGCO Group respects for human rights matter to ensures our business sustainability and continuity.

A company process on human rights encompasses to be covering its operations as well as joint ventures and all sorts of business partners. In addition, the process also covered public and private entities throughout EGCO Group's value chain, including employees, suppliers, contractors, business partners, distributors and customers.



EGCO Group Human Rights Implementation Approach

Business Responsibility on Human Rights Observance



Policy

EGCO Group committed to respecting all human rights aspects. The company communicates its intention through the human rights policy and embeds it in the EGCO Group's culture to be cover all dimensions.



Human Rights Due Diligence

EGCO Group identified and carried on its potential human rights issues. The company continuously follows the performance of prevention and mitigation impacts along with communicates our effort on the finding issues.



Remediation

EGCO Group established our grievance mechanisms on operational-level for human rights matters together with providing and driving actions on remediation plans at all levels.

Engage transparently with EGCO Group's stakeholders throughout the value chain

EGCO Human Rights Due Diligence Process

EGCO Group has conducted and reviewed the human rights risk assessment and due diligence on annual basis. By doing so, EGCO is able to identify human rights risks and prevent them throughout its business activities, where both internal and external stakeholders are involved.

The conduct of the risk assessment and due diligence is guided by the UN Guiding Principles on Business and human Rights (UNGPs) to assess actual and potential impacts.



EGCO Group Human Rights Policy



Human Rights Policy

The Electricity Generating Public Company Limited or EGCO

As a leading company that sustainably generates electric power in Thailand and abroad, the Electricity Generating Public Company Limited, or EGCO, promotes and encourages respect of human rights throughout the company. EGCO also expects executives and employees in all levels to respect human rights of all stakeholders in order to ensure that the basic rights of all stakeholder groups are respected equally.

This Human Rights Policy applies to all companies where EGCO has management control. Additionally, the Policy encourages joint ventures, business partners, suppliers, and all stakeholders to be aware of and act in alignment with the principles expressed in this Policy:

1. Adherence to this Human Rights Policy in all business activities in alignment with the United Nations Universal Declaration of Human Rights (UNDHR) and the Core Conventions of the International Labour Organization (ILO Conventions),
2. Conducting all business activities while avoiding directly and/or indirectly creating adverse impacts towards the human rights of rights holders, such as employees, communities, stakeholders of suppliers and business partners, and customers,
3. Upholding human rights and the human dignity of all rights holders equally,
4. Inspecting human rights issues in all of its business activities, including direct impacts from own operations and impacts that EGCO may be involved in or have a role in supporting in every area of operation, and,
5. Communicating and ensuring understanding for all stakeholders in its business value chain, including subsidiaries, joint ventures and suppliers and business partners.

EGCO's executives will drive and encourage the implementation of processes that follow with the principles expressed in this Policy.

Scope

This Human Rights Policy applies to all companies where EGCO has management control. Additionally, the Policy encourages joint ventures, business partners, suppliers, and all stakeholders to be aware of and act in alignment with the principles expressed in this Policy.

- Respect for human rights is important to EGCO Group in ensuring business sustainability and continuity. In 2018, the company announced its first human rights commitment through a standalone human rights policy.
- The scope of the human rights policy refers to EGCO Group's expectation on human rights compliance not only in their own operation but also subsidiaries, joint-venture, business partners.
- EGCO Group has made commitments in relation to the human rights focusing four areas: employees, communities and environment, supplier and business partners, and customers.
- Human rights topics in the policy are, for example, safety and well-being discrimination, working hours and remuneration child labour, force labour, employment practices, freedom of association and grievance mechanism.

Human Rights Risk Assessment

In order to identify human rights risks and prevent human rights violations or other adverse impacts on human rights from occurring in its operations, EGCO Group has performed a human rights risk assessment that covers its entire value chain.

This human rights risk assessment is part of the human rights due diligence process, and allows EGCO Group to identify, prevent, and mitigate human rights risks throughout the activities of its direct Operations, Subsidiaries and Joint Ventures. This includes both internal stakeholders such as employee, as well as external stakeholders such as suppliers, communities, and customers, and comprehensively covers vulnerable groups, such as women, pregnant women, employee with health issues, children, migrant worker, third-party contracted labor, indigenous people, local communities, and disable people.

In 2020, EGCO Group reviews results of human rights risks assessment in own operation and our value chain/ activities related to our business as part of its human rights due diligence. Furthermore, the Company has identified human rights risks from new business relations (mergers, acquisitions, and joint ventures). Also, the risk mapping of potential issues has been conducted. This process helps EGCO to improve human rights management of relevant business operations and its business related activities, and develop appropriate mitigation measures against existing and future risks and impacts.

Human Rights Risk and Impact Assessment Methodology



- Identify all potential and actual human rights issues associated with functions/ subsidiaries/ and joint ventures
- Mapping potential human rights issues with affected right holders and vulnerable groups
- Conduct human rights inherent risk assessment
- Identify how each inherent risk is being managed through existing mitigation measures and/or controls
- Rank residual risk with the company's existing mitigation measure/or control
- Prioritize human rights salient issues.

EGCO Group Human Rights Assessed Issues

EGCO Group respect for all rights

Right to life	Right to access to effective remedies	Right of protection for the child	Right to participate in public life	Right to education
Right to liberty and security	Right to a fair trial	Right to marry and form a family	Right to social security, including social insurance	Right to take part in cultural life, benefit from scientific progress, material and moral rights of authors and inventors
Right not to be subjected to slavery, servitude or forced labour	Right to be free from retroactive criminal law	Right to own property	Right to work	Right of self-determination
Right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment	Right to privacy	Right to freedom of thought, conscience and religion	Right to enjoy just and favorable conditions of work	Right of detained persons to humane treatment
Right to recognition as a person before the law	Right to freedom of movement	Right to freedom of opinion, information and expression	Right to form and join trade unions and the right to strike	Right not to be subjected to imprisonment for inability to fulfill a contract
Right to equality before the law, equal protection of the law, non-discrimination	Right to seek asylum from persecution in other countries	Right to freedom of assembly	Right to an adequate standard of living	Right of aliens due process when facing expulsion
Right to freedom from war propaganda, and freedom from incitement to racial, religious or national hatred	Right to freedom from war propaganda, and freedom from incitement to racial, religious or national hatred	Right to freedom of association	Right to health	Rights of minorities

Identified Individual Human Rights Issues relevant to EGCO Group's business

Right to life	Right to access to effective remedies	Right of protection for the child	Right to participate in public life	Right to education
Right to liberty and security	Right to a fair trial	Right to marry and form a family	Right to social security, including social insurance	Right to take part in cultural life, benefit from scientific progress, material and moral rights of authors and inventors
Right not to be subjected to slavery, servitude or forced labor	Right to be free from retroactive criminal law	Right to own property	Right to work	Right of self-determination
Right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment	Right to privacy	Right to freedom of thought, conscience and religion	Right to enjoy just and favorable conditions of work	Right of detained persons to humane treatment
Right to recognition as a person before the law	Right to freedom of movement	Right to freedom of opinion, information and expression	Right to form and join trade unions and the right to strike	Right not to be subjected to imprisonment for inability to fulfill a contract
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Identify all relevant human rights issues

From list of Human Rights universe (slide 9), Human rights issues in energy sectors that are related with functions are identified through peer benchmarking.

This identification process also takes into account of vulnerable groups, such as women, pregnant women, employee with health issues, children, migrant worker, third-party contracted labor, indigenous people, local communities, and disable people.



Employee Practices:

Working condition, Safe and healthy working condition, Discrimination in the workplace, and Freedom of association, assembly and collective bargaining, and Freedom of opinion, information and expression, Transparency and anti-corruption



Community and Environment:

Standards of living and quality, Community health and safety, and Land property acquisition, Water usage and water discharge, Impact of pollution (noise, air, odor), Waste and hazardous, and Biodiversity



Supply Chain Management:

Working condition, Safe and healthy working condition, Illegal forms of labors (e.g. child labour, migrant workers and forced labour), Discrimination, and Security management

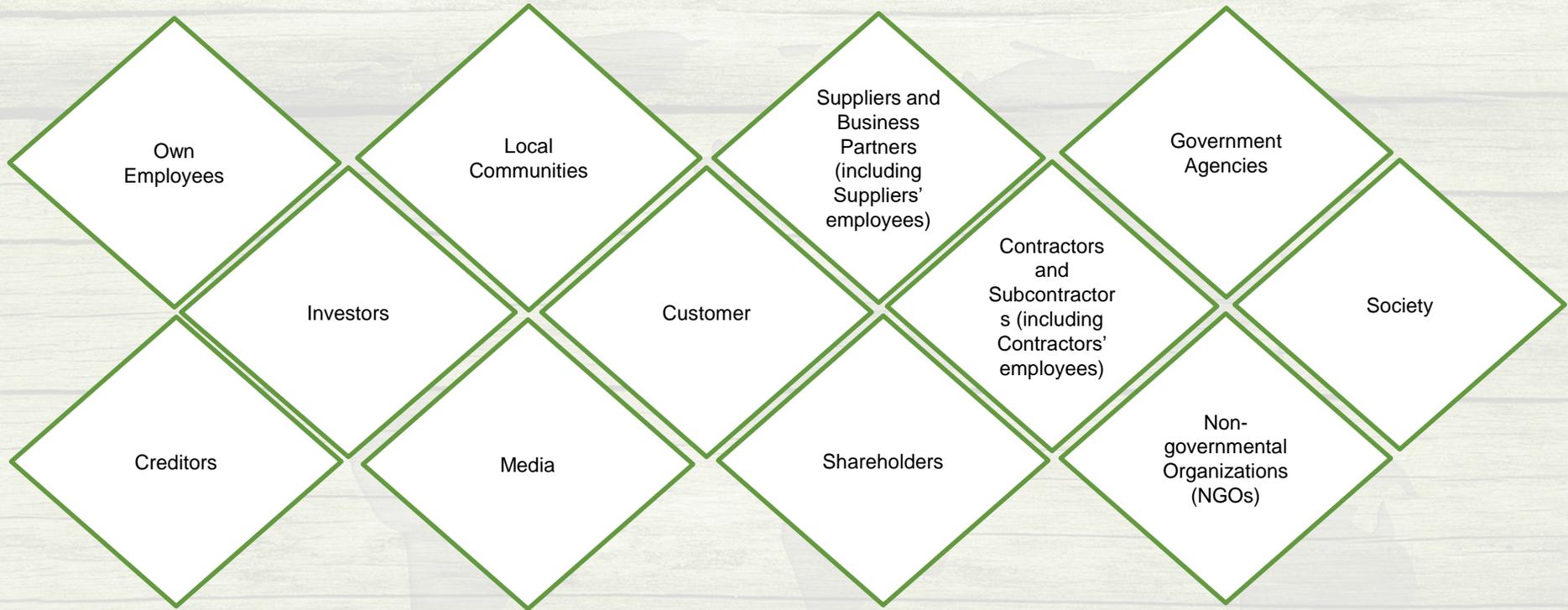


Customer Rights:

Customer standard of living, Consumer health and safety, Customer data privacy, and Customer discrimination

Identify relevant EGCO Group's stakeholders

EGCO Group identified the affecting group of stakeholders and vulnerable groups listed below:



Vulnerable groups: Person with disabilities, Minorities, Migrant workers, Women, Children, Indigenous people/ communities, Elderly, Plant operator, Third-party contracted labor

Tool for rank and evaluate inherent risks and residual risks

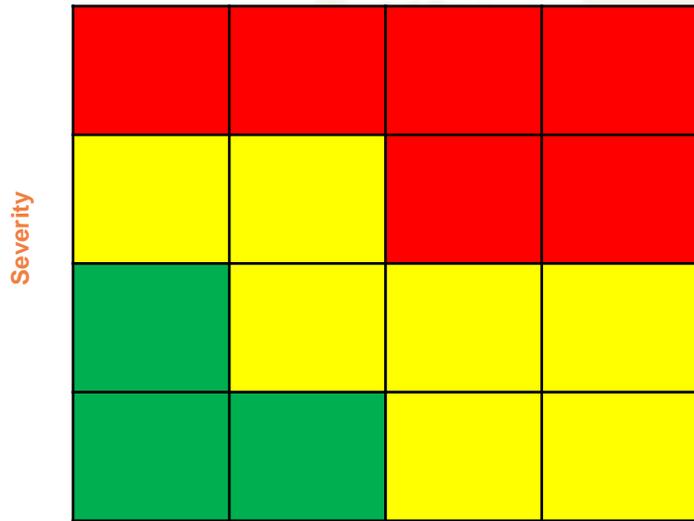
Human Rights Matrix

The assessment of human right is conducted by considering Human Rights Matrix, where human rights risks that right holders including stakeholders, especially vulnerable groups of business activities may experience are ranked. Risks are assessed and categorized by one of three below levels. These levels are developed from considering severity and likelihood in combination.

High	Human rights risks that fall into High level are considered as human rights salient issues, which need to be addressed with additional mitigation measures.
Medium	Medium risks are key human rights risks that EGCO groups may need to understand but they are presently adequately mitigated and should be monitored regularly for changes.
Low	Low risks are human rights risks that are presently adequately mitigated, and should be monitored regularly for changes.

Tool for rank and evaluate inherent risks and residual risks

Human Rights Risk Assessment Criteria: Likelihood (X-Axis)



Likelihood

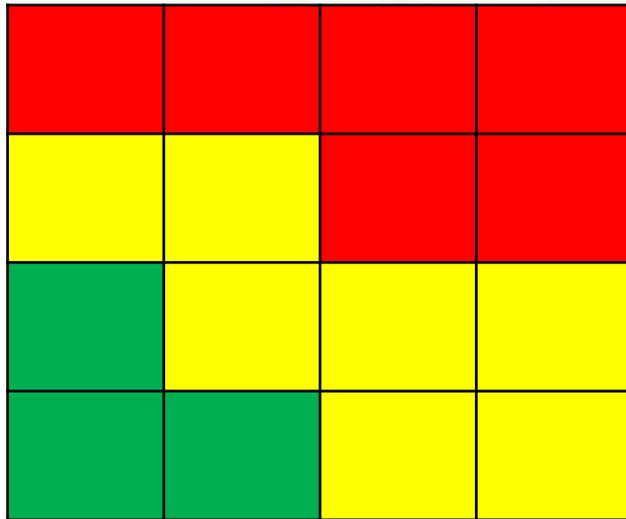
Likelihood is defined by considering likelihood of risk to occur in workplaces, communities, local context or nearby areas that are potential to be affected by business activities.

Likelihood		
Likelihood Level	Likelihood / Frequency	Example
Very likely (4)	Occurs all the time or every year (>90%)	Such human rights issues have occurred consistently from the past until present. (Already happened in the past/ might be occurred every year)
Likely (3)	Occurs very often or every 1-5 years (>50% - 90%)	Such human rights issues have happened in the past and also occurred very often at the present.
Unlikely (2)	Occurs rarely or every 5-10 years (>10% - 50%)	Such human rights issues have happened in the past and also occurred sometimes at the present, sometimes may occur in some organization
Very unlikely (1)	Almost never or every 10 years or more (≤10%)	Such human rights issue have never occurred in our business operation but have occurred in the industry of the operation.

Tool for rank and evaluate inherent risks and residual risks

Human Rights Risk Assessment Criteria: Severity (Y-Axis)

Severity



Likelihood

Severity of risk and impact is defined by considering scale, scope, and ir-remediability. The level of severity is determined by one of considered factors, which has the highest level.

Severity			
Severity Level	Scale <i>(seriousness of impact)</i>	Scope <i>(how many people are or will be affected)</i>	Irremediable Nature <i>(difficulty to restore the people impacted to a situation before impact)</i>
Critical (4)	Significant impact to health and safety: physical disability or fatality	Impact to all stakeholders in the group e.g. all of people in community, all of employee, all of supplier	Impossible to restore or will take longer than 5 years (>5 years) to restore the impact
High (3)	Moderate impact to health and safety: serious injury that needs rehabilitation (loss time injury)	Impact to most stakeholders in particular stakeholder group	Take 3-5 years to restore the impact
Medium (2)	Slight impact to health and safety: minor injury or illness (no loss time)	Impact to some stakeholders in particular stakeholder group	Take 1-3 years to restore the impact
Low (1)	Minor impact to health and safety: first aid case	No negative impact to stakeholder	Take less than a year (<1 year) to restore the impact

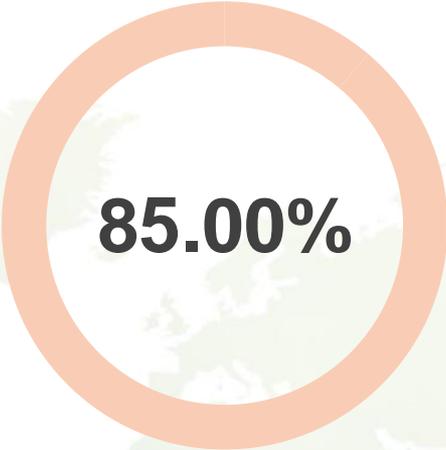
2020 EGCO Group Human Rights Risk Assessment Results

(EGCO Group Operation and Subsidiaries)



100%

- **100%** of EGCO Group operation and business activities were assessed. EGCO operation and business activities consisting of subsidiaries that EGCO have its rights to controls on management and suppliers



85.00%

- **85.00%** of EGCO Group operation and business activities have high human rights risks
- Human Rights identified at high-risk:
- ❖ Safe and Healthy Working Condition (including COVID-19 complications to health and safety)

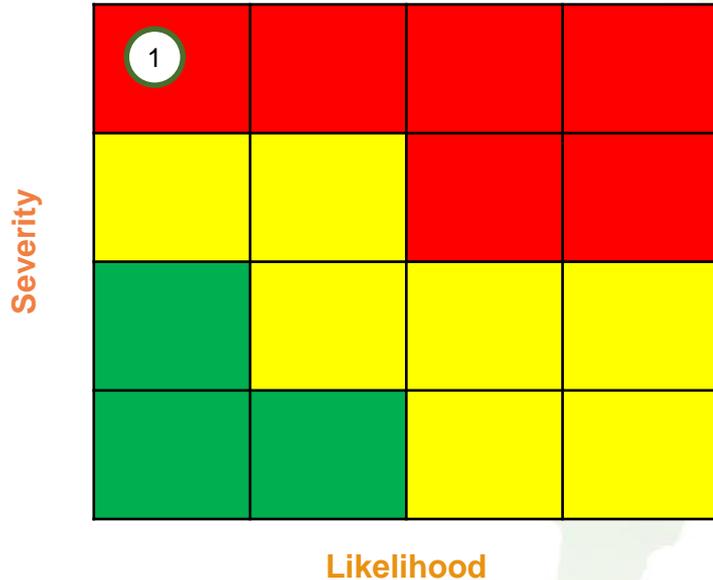


100%

- **100%** of EGCO Group operation and business activities have mitigation measures and remediation process implemented
- Please see following pages and *EGCO One Report 2020* (pages 129) for more details on mitigation measures and remediation process implemented.

2020 Main Human Rights Issues Identified

(EGCO Group Operation and Subsidiaries)



2020 Human Rights Issues identified at high risk

- 1 Safe and Healthy Working Condition (including COVID-19 complications to health and safety)

High	Human rights risks that fall into High level are considered as human rights salient issues, which need to be addressed with additional mitigation measures.
Medium	Medium risks are key human rights risks that EGCO groups may need to understand but they are presently adequately mitigated and should be monitored regularly for changes.
Low	Low risks are human rights risks that are presently adequately mitigated, and should be monitored regularly for changes.

2020 Human Rights Salient Issues and Mitigation Measure

(EGCO Group Operation and Subsidiaries)

Risk



Safe and Healthy Working Condition

(including COVID-19 complications to health and safety)

Description:

Workers are exposed to physical health and safety risks or exposed to less immediate or psychological health and safety risks. They also face adverse impact on their health and safety during the spread of global pandemic (COVID-19)

Affecting stakeholder:

Own employees, Suppliers, and sub-contractors' workers who work for the power production and service activities of EGCO Group

Activity at risk:

Operation at power plants, site construction, and client sites.

Mitigation



- **EGCO** established Safety, Health, and Environment (SHE) Management Standards Guideline
- **EGCO** prepared Emergency Response Plans
- **EGCO** established procedures to identify hazards and safety risks
- **EGCO** conducted safety training for employees and supplier/ contractors
- **EGCO** conducted safety audit and procedures for incident recording
- **EGCO** established Environmental Management System (EMS) steering committee and process on EMS in accordance with ISO14001:2015 and Occupational Health and Safety (OH&S) in accordance with ISO45001:2018

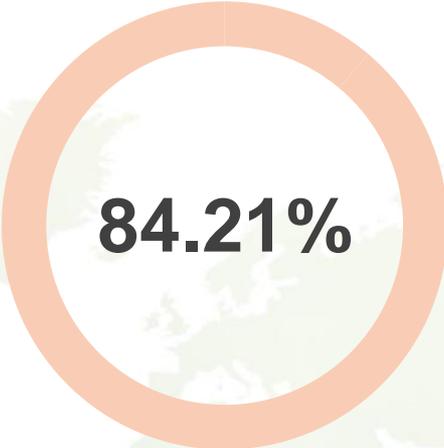
2020 EGCO Group Human Rights Risk Assessment Results

(EGCO Group Joint Ventures)



100%

- **100%** of EGCO Group operation and business activities were assessed. EGCO operation and business activities consisting of joint ventures and subsidiaries that don't have rights to controls on management and suppliers



84.21%

- **84.21%** of business activities in EGCO Group value chain have high human rights risks

Human Rights identified at high-risk:

- ❖ Health and Safety (including COVID-19 complications to health and safety) in Power Producer
- ❖ Health and Safety (including COVID-19 complications to health and safety) in Oil Transportation service

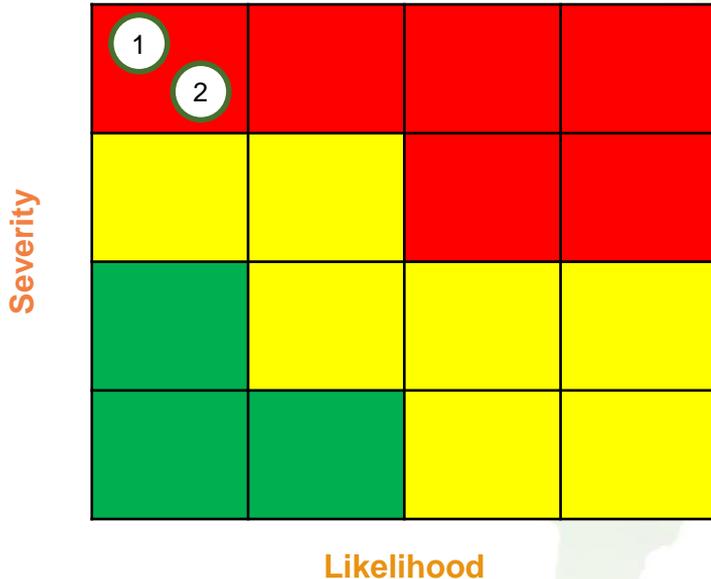


100%

- **100%** of EGCO Group operation and business activities have mitigation measures and remediation process implemented
- Please see following pages and *EGCO One Report 2020* (pages 129) for more details on mitigation measures and remediation process implemented.

2020 Main Human Rights Issues Identified

(EGCO Group Joint Ventures)



2020 Human Rights Issues identified at high risk

- 1 Health and Safety (including COVID-19 complications to health and safety) in Power Producer
- 2 Health and Safety (including COVID-19 complications to health and safety) in Oil Transportation service

High	Human rights risks that fall into High level are considered as human rights salient issues, which need to be addressed with additional mitigation measures.
Medium	Medium risks are key human rights risks that EGCO groups may need to understand but they are presently adequately mitigated and should be monitored regularly for changes.
Low	Low risks are human rights risks that are presently adequately mitigated, and should be monitored regularly for changes.

2020 Human Rights Salient Issues and Mitigation Measure

(EGCO Group Joint Ventures)

Risk



Health and Safety

(including COVID-19 complications to health and safety)

Description:

Workers are exposed to physical health and safety risks or exposed to less immediate or psychological health and safety risks. They also face adverse impact on their health and safety during the spread of global pandemic (COVID-19)

Affecting stakeholder:

EGCO's JV employees, Suppliers, and sub-contractors' workers who work for the power production and oil transportation activities

Activity at risk:

Operation at power plants, site construction, client sites, and oil transportation route.

Mitigation



- **The company** established Safety, Health, and Environment (SHE) Management Standards Guideline
- **The company** prepared Emergency Response Plans
- **The company** established procedures to identify hazards and safety risks
- **The company** conducted safety training for employees and supplier/ contractors, including the use of personal protective equipment (PPE) and behavior-based safety program
- **The company** provide medical check-up for employees including COVID-19 testing and tracking
- **The company** conducted safety audit and procedures for incident recording
- **The company** established Environmental Management System (EMS) steering committee and process on EMS in accordance with ISO14001:2015 and Occupational Health and Safety (OH&S) in accordance with ISO45001:2018
- **The company** provide COVID-19 protections including safety & prevention mechanisms (masks, alcohol sanitizer, etc.) with clear quarantine and work from home policy



Tracking and Communication

EGCO Group is committed to conduct regular review of human rights due diligence as it is an on-going process. In addition, the company will report its human rights performance every year and will publicly disclose findings through the annual sustainability report or its website.

Communication Channel

Electricity Generating Public Company Limited
222 EGCO Tower, 14th, 15th Floor, Vibhavadi Rangsit Rd., Tungsonghong,
Laksi, Bangkok 10210 Thailand

www.egco.com



Remediation Actions Taken

Human Rights Situation in 2020

EGCO Group is committed to conducting human rights risk assessment within an appropriate timeframe in conjunction with preparing risk prevention and mitigation measures, providing reasonable remedies in cases of violations, monitoring and reporting performance, as well as reviewing policy commitment to ensure maximum effectiveness in human rights management. Furthermore, the company takes the importance of any types of remediation actions involving compensation and other forms of remedy that shall amend the harm caused. The outcome can be in any form, such as apologies, restitution, rehabilitation, financial or non-financial compensation, punitive sanctions, and the prevention of harm. This is to ensure that the company can truly amend or mitigating the potential of human rights violations.

However, in 2020, there was no report or complaint regarding human right violation in EGCO's operation. Thus, there were no remediation actions necessary and taken.