



The Electricity Generating Public Company (Limited)

Human Rights Due Diligence Manual

April 2021 Version

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1 INTRODUCTION

Amid an increased global emphasis on human rights, business sector has been watched by investors, governmental sector, the public, private sector and media, on responsibilities on respect of human rights of all stakeholders involving in their business relationships. For human rights in business, there are two sides of a coin. On one side, business assumes the role of human rights support, accomplished by elevating quality of life via business activities, by further developing public utility to ensure the public access. However, on another side, there are also possibilities of human rights violations occurring in business activities. This comprises an unsafe working environment, pollution infringing the rights of local communities, to name a few. Human rights violation may lead to negative impacts to overall business activities, such as cancellation of contracts, negative impacts on corporate image, as well as social backlash.

The introduction of the Protect, Respect and Remedy Framework as outlined in the UN Guiding Principles on Business and Human Rights (UNGPs) marked the establishment of new requirements for business conduct. Companies are expected to respect human rights, or in other words, avoid infringing upon the rights of others. As one of Thailand's leading electricity generating companies, Electricity Generating Public Company (Limited) or EGCO Group (the company) is committed to respect for human rights and fairness to individuals and stakeholder groups with a view to strengthening its core value and ensuring business sustainability. In this regard, the company has established a human rights due diligence process in order to ensure that it adequately understands, prevents, mitigates, and account for how the company addresses its adverse human rights impacts and risks.

Furthermore, EGCO Group's management shall continuously drive and support all necessary activities to achieve the company's expectation and in line with all of the international standards of Human Rights. Therefore, the Board of Directors has assigned the Corporate Governance and Corporate Social Responsibility Committee (CC Committee) to oversee the sustainability management which including the Human Rights management. The EGCO's president shall supervise the overall operation regarding the Human Rights, whereas, the Corporate Governance Working Group has been assigned to functionality on this matter.

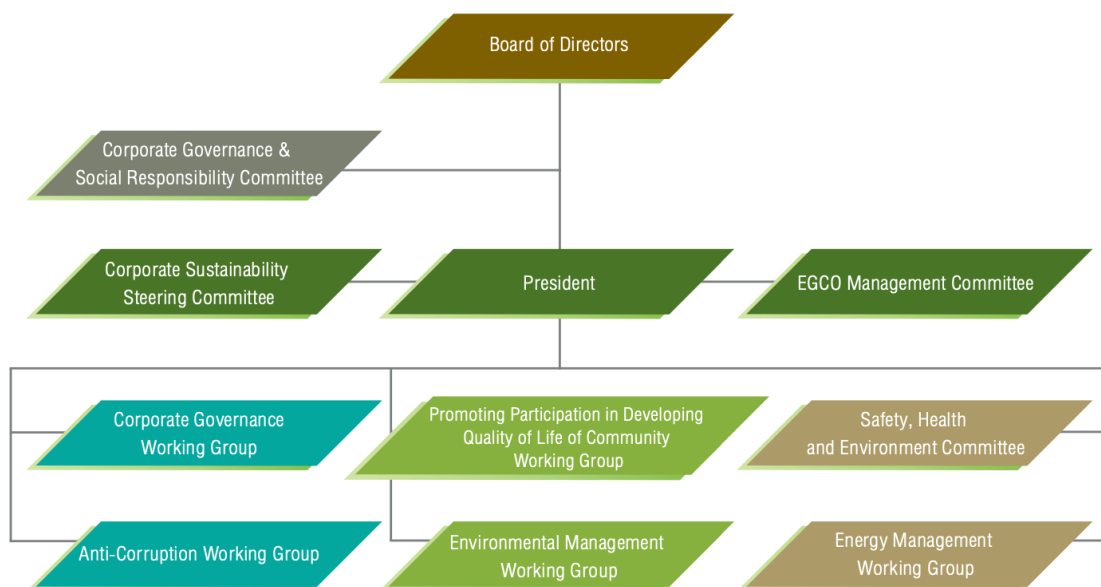


Figure 1.1: Sustainability Management Structure (Human Rights Flowchart Responsibility)

This Human Rights Due Diligence process has been designed to be an ongoing process. This will be applied to all EGCO Group's activities, where potential human rights impacts and/or risks exist. This includes operational activities and activities within the value chain (i.e. sourcing raw materials, delivery of goods and services).

This document has been developed to standardize the process and communicate it to all relevant functions. The purpose of the human rights due diligence process will be further described in more detail in **Section 5**.

2 GOALS AND OBJECTIVES

The human rights due diligence process aims to inform EGCO Group of its potential human rights impacts on internal and external stakeholders associated with its business activities and relationships. In addition, this process enables EGCO group to identify and prioritise corporate human rights risks, and effectively plan and manage these critical human rights risks through existing and additional mitigation measures.

Objectives of this process are to provide a structured process through which relevant functions/ units can identify, manage, and monitor potential human rights impacts associated with their operations. results of the human rights due diligence will guide management strategies of the company to lower risk impacts to acceptable levels, as well as to prevent and/or mitigate the potential impacts before they occur.

3 SCOPE

The methodology applies to all human right risks and impact assessment at both corporate-subsidary, joint venture, and suppliers & business partners -level. It extends to external stakeholders who are relevant and may be impacted by the company's business operation throughout the value chain, such as suppliers, consumers, community and the surrounding environment.

The methodology mainly refers stipulation of related international agencies, such as United Nations Guiding Principles on Business and Human rights, International Finance Corporation (IFC), Danish Institution for Human Rights (DIHR), Principles of the United Nations Global Compact (UNGC), the Core Conventions of the International Labour Organization (ILO Conventions), and United Nations Universal Declaration of Human Rights (UNDHR).

4 DEFINITION OF HUMAN RIGHTS

Human rights are the basic freedom and protections that all people are entitled to. All human rights are underpinned by the following 4 principles (Guide to Human Rights Impact Assessment and Management: HRIAM) including:

- Universal All people are born with and are entitled to the same human rights, regardless of nationality, residence, gender, race, ethnicity, religion and cultural heritage.
- Inalienable Human rights should not be taken away or compromised except in specific situations and according to due process.
- Indivisible All human rights should be equally considered. Civil and political rights are of equal importance to economic, social and cultural rights.
- Interdependent and interrelated Human rights are mutually reinforcing. The enjoyment of one human right often relies wholly, or in part, on the existence of other human rights. Similarly, the interference of one human right often negatively affects other human rights.

Furthermore, there are other human rights stipulations and standards placed on the aforementioned criteria, such as International Bill of Rights. The Bill comprises of Universal Declaration of Human Rights (UDHR), International Covenant on Civil and Political Rights (ICCPR), and International Covenant on Economic, Social and Cultural Rights (ICESCR) as demonstrated in

BOX 4.1

BOX 4.1 Human Rights

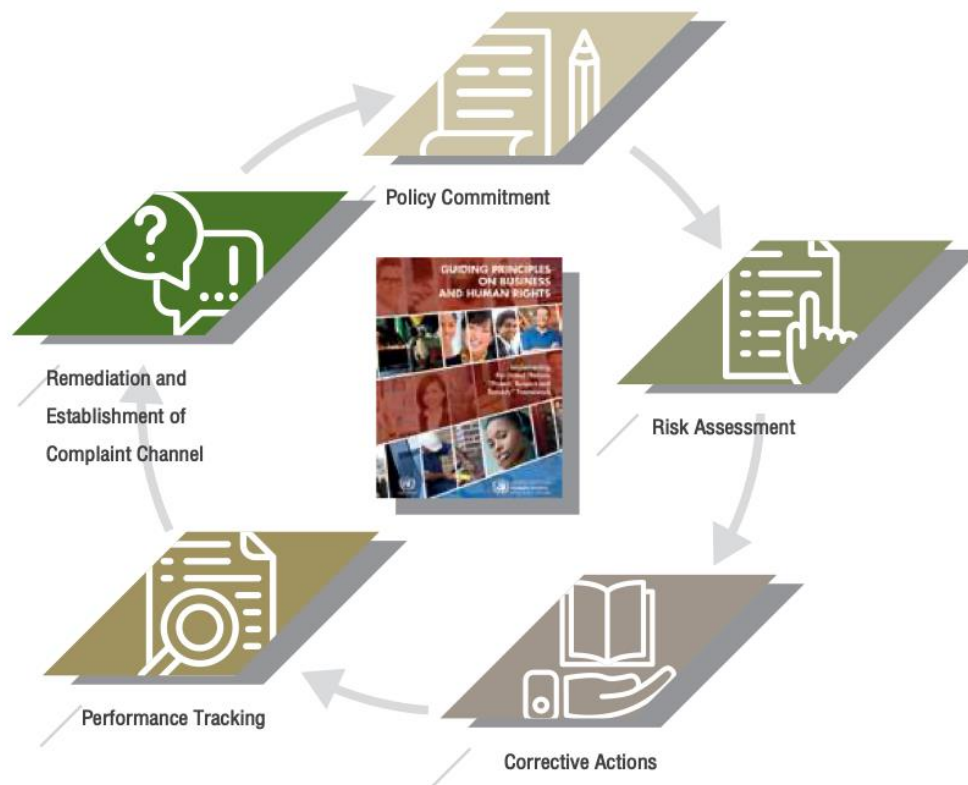
Human rights are typically divided into 2 categories, civil and political rights and economic, social and cultural rights

- 1) International Covenant on Civil and Political Rights (ICCPR) Civil and political rights protect the individual from unwarranted infringement by government and private organisations and guarantee the individual the ability to participate in civil and political life without discrimination or repression. Examples of civil and political rights includes the: right to life, freedom of religion, freedom of speech, freedom of assembly, and rights to due process and a fair trial.

- 2) International Covenant on Economic, Social and Cultural Rights (ICESCR) Economic, social and cultural rights are found on the belief that people can enjoy rights, freedoms and economic justice all at the same time. Examples of economic, social and cultural rights includes the right to work, the right to just and favourable working conditions, the right to an adequate standard of living and the right to education.

5 HUMAN RIGHT DUE DILIGENCE PROCESS

EGCO Group's human rights due diligence is shown in as shown in **Figure 5.1** The process will be conducted and reviewed on an annual basis to ensure that high operational standards are maintained throughout the current business and new business expansions. The process is adapted to our operation (employees, direct activities, products or services), Subsidiaries and Joint ventures, and our Supplier (tier1 and non-tier 1), contractors, service providers, and key business partners (e.g., non-managed operations, licensees, outsourcing partners, etc.). Detailed explanation of each elements in the human rights due diligence process is shown in **section 6 – 8**

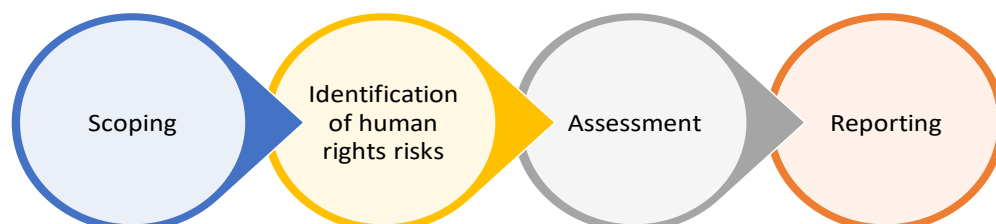


Source: 2019 EGCO Sustainability Report

Figure 5.1: EGCO Group's Human Rights Due Diligence

6 ASSESSMENT OF ACTUAL AND POTENTIAL RISKS AND IMPACTS

One of the critical steps in the human rights due diligence process is to assess human rights risks and impacts. This stage consists of the following steps as shown in **Figure 6.1**.



Source: IFC's Guide to Human Rights Impact Assessment and Management (HRIAM), 2011

Figure 6.1: EGGO Group's Human Rights Risk and Impact Process Flow

6.1 PLANNING AND SCOPING

The first step of human right risks and impact assessment is to scope. Scoping enables executives to become aware of stakeholders likely to be impacted by the company's business activities. The findings reflect the scope of data collection and anticipated impacts. Such findings can be obtained from following methods:

- Review of peers' human right issues through primary source, such as publicly disclosed human rights performance, which may be disclosed through corporate website, sustainability report, and media analysis.
- Review risks of human rights violation within the geography of operation.
- Review of human rights risks from publications by United Nations and non-profit organizations, such as Human Rights Watch, Amnesty International, Business for Social Responsibility Organization, Business & Human Rights Resource Center and Business and Human Rights Scholars Association. The identified potential human rights issues covered forced labor, human trafficking, child labor, freedom of association, collective bargaining, equal remuneration, discrimination and harassment.

For relevant human rights issues for human rights risk assessment of power & utility industrial sectors can be found in **Table 6.1**.

Table 6.1: Human Rights Issues for Human Rights Risk Assessment of Power & Utility Industrial sectors

Labor Rights	Community Rights	Environment	Security and Safety	Consumer Rights
<ul style="list-style-type: none">• Working Conditions• Freedom of Association and Collective Bargaining• Forced and Compulsory Labor• Child Labor• Safe and Healthy Working Conditions• Discrimination and harassment	<ul style="list-style-type: none">• Standards of Living and Quality of Life• Community Health and Safety• Community Engagement• Cultural Heritage• Minorities Including Indigenous Peoples• Resettlement	<ul style="list-style-type: none">• Water Security - Impact of Pollution• Waste and Hazardous Materials Management• Preservation of Biodiversity• Broadening Access to Energy	<ul style="list-style-type: none">• Security Management• Security Training	<ul style="list-style-type: none">• Consumer Health and Safety• Data Privacy

Source: Business and Human Rights Scholars Association (BSR), '20 human rights priorities power and utilities-sector'

Furthermore, when it comes to scoping, the company must consider both human rights risks already occurred and those likely to occur throughout the entire value chain. This includes direct business activities by the company and indirect activities throughout the value chain or other activities related to our business by suppliers, contractors, or trade partners along with the risk identification from our new business relations (mergers, acquisitions, and joint ventures); all of which may cause complicity in human rights violation. More information can be found in **Box 6.1**.

BOX 6.1 Complicity in Human Rights Violation

Human Rights Impact Assessment must consider complicity in human right violation, by considering the following:

- Direct complicity: This occurs when a business assists another organization or individual in perpetrating a human rights violation. For example, a company donates equipment to state security forces when the company knows (or should have known) that the equipment could be used to violate human rights.
- Beneficial complicity: This occurs when a business directly benefits from a human rights abuse committed by another organization or individual. For example, state security forces may use disproportionate force in protecting a company's interest.

- **Silent Complicity:** This occurs when a company fails to challenge systematic human rights violations regardless of whether these violations are related to its business, such as discrimination against certain labor groups when it comes to employment.

Source: United Nations Global Compact, <https://www.unglobalcompact.org/what-is-gc/mission/principles/principle-2> (2021)

Once the data from the primary source has been reviewed, relevant human rights issues will be categorized to demonstrate the scope of assessment. Example of the company's scope in human rights assessment, categorized according to stakeholders in business value chain, is demonstrated in **Figure 6.2**



Source: Human Rights Issues according to peers and other publications from governmental agencies or other reputable non-governmental agencies

Figure 6.2: Example of the Company's Scope in Human Rights Risks and Impacts Assessment

6.2 IDENTIFICATION OF HUMAN RIGHTS RISKS

Identification of human rights risk is a critical informative step to obtaining human rights issues, as confirmed by participants of human rights assessment process, who have direct association with these risks. This was according to the scope of issue initially studied in 6.1. Notably, participants of the assessment process may also propose additional risks issues beyond the established scope. Results following data collection and baseline development are as follows.

- Identification of actual and potential human rights risks and impacts associated with the company's activities (own operations), value chain or other activities to business, and new business relations (mergers, acquisitions, joint ventures). The human rights issues include non-discrimination treatments, anti-harassment, as well as prohibiting child labor, forced labor, human trafficking, and promote the right to freedom of association, collective bargaining and equal remuneration, and other rights.
- Identification of right holders or individuals affected from the risk issues associated to the company's activities, such as employees, local communities, suppliers' labors, contractors, consumers and vulnerable group which comprises women, children, indigenous people in the country where EGCO group operate, migrant labour, third party contracted labour, disabled people, pregnant women, and LGBTQI+. Existing mitigation measures/controls the company uses to mitigate these risks.
- Identify inherent risk and salient issues that company must monitor and review, as well as issuing measures to reduce said risks. Further information on salient issues can be found at **6.3.2**.

To obtain such information, the company must have data collection with responsible departments in business activities associated with risks identified in **Figure 6.2**. The following methods may be used.

6.2.1 Conducting Workshops with Representatives from Responsible Departments

The approach in conducting a workshop comprises grouping participants of assessment process according to the predefined topic identified in **6.2**. The assessment scope is divided according to right holders or individuals affected by EGCO operations, subsidiaries, and joint ventures and its value chain or activities related to its business, such as employees, communities and environment, suppliers and contractors, and consumers.

1. Each group identifies all human risks associated with its function that may potentially occur and receptors for each risk. The Universal Declaration of Human Rights related to predefined topic (**Attachment 1**), right holders and potential impacts towards them. An example of human right risks from this process are presented in **Attachment 2**, Human Rights Risk Register Spreadsheet, EGCO GROUP's Detailed Assessment, titled Human Rights Issue and Description of Impact.
2. Each shares how predefined human right risks are being managed through existing measures and/or risks control by the company. Example of data from this process is presented in **Attachment 2**, Human Rights Risk Register Spreadsheet, EGCO GROUP's Detailed Assessment, titled Existing Human Rights Controls.
3. Each group convene to rank inherent and residual risks against pre-defined scoring criteria. Risk assessment criteria is presented in 6.3.

6.2.2 Data Collection through Human Right Risks Register

The company may request for relevant information through the use of human right risk register. Document may be distributed to representatives of responsible departments, who will fill out the form and submit the results to Human Resources Department for data collection. The human rights risk register comprises data on human rights risks and impact assessment related to the company's business activities (own operations), value chain or other activities to business, and new business relations (mergers, acquisitions, joint ventures). Furthermore, prevention measures or risk controls are currently in place. This includes scoring of likelihood and severity of residual risks. An example of human rights risk register is presented in **Table 6.2**.

Table 6.2: Example of Human Rights Risks in EGCO Group

Human Rights Issue	Type of Activity	Description of Impact	Human Rights Risk from Peers	EGCO Human Rights Risks	Vulnerable Groups	Individual Human Rights	Inherent Risk			Existing Human Rights Controls	Residual Risk			Additional Human Rights Controls (for salient issues)		
							Likelihood	Severity	Risk Level		Likelihood	Severity	Risk Level			
Employee Practices																
Working conditions (Domestic) (incl. COVID-19 complications of employees' unfair dismissal and work from home condition)	• Domestic operation	Employees' rights may be violated if they are not granted fair working conditions, including but not limited to fair compensation, access to leave, social security, and tasks that follow the job description. As work in the power plant can often expand beyond normal working hours during the day, and can often extend for long periods, particular attention must be paid proper overtime compensation and the scope of the job description. Due to the spread of global pandemic (COVID-19), employees risk to be dismissed from work due to implicit bias. The company may also have activities that violate employees' human rights, such as the failure to control overtime work and tasks that go beyond the job description.	• Wages that do not guarantee an adequate standard of living • Failure to provide holidays • Groundless disciplinary action and dismissal • Limited worker welfare i.e. safe drinking water, sanitation systems • Lack of access to medical services	• Overtime work • Fair compensation • Freedom of expression • Disciplinary action and fair dismissal • Safe drinking water and sanitation systems	• Persons with disabilities • Minorities • Migrant workers • Women	3 Right not to be subjected to slavery, servitude, or forced labour 23 Right to social security, including social insurance 25 Right to enjoy just and favorable conditions of work 27 Right to adequate standard of living 28 Right to health	1	2	2	L12	- Compliance with labour regulations - Representation and leadership by Welfare Committee - Overtime work policy that controls overtime work at no more than 20 hours per week - Paid maternity leave (120 days compared to the legally required 90 days) and paternity leave (15 days compared to the legally required 2 days) - Paid leave for Buddhist meditation practice - Grievance mechanisms and whistleblower policy	1	1	1	L16	- Apply UN Guiding Principles on Business and Human Rights (UNGPs) appropriately

6.3 ASSESSMENT

Severity assessment of impact adheres to human right risks assessment matrix (**Figure 6.3**). Risk scoring is according to the 2 primary dimensions of human right risk assessment, which are severity and likelihood, to identify the level of risk. There are 3 levels, which are high, medium and low. Further information regarding risk assessment criteria is available in **6.3.1**.

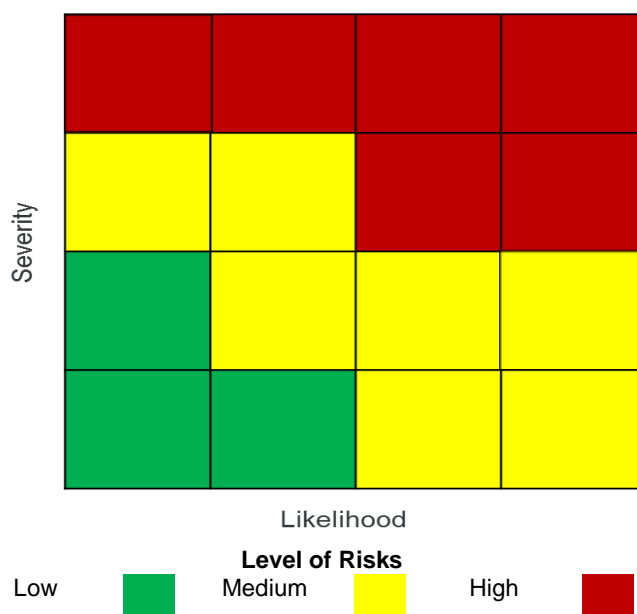


Figure 6.3: Human Rights Risk Assessment Matrix

6.3.1 Human Right Risks Assessment Criteria

Guiding principle on business and human rights identifies severity of issues as a component to observe when human right impact assessment is implemented. The details is presented in **Box 6.2**. Presently, the company has develop human right risks assessment criteria, which can be used in tandem with the scoring criteria outlined by guiding principle on business and human rights, as presented in **Table 6.3**.

BOX 6.2 HUMAN RIGHTS ASSESSMENT CRITERIA: SEVERITY

- Scale How grave the impact is, for instance, impacts on the right to life or the health and safety of individual workers;
- Scope: How many people are or will be affected - for example, impacts on the livelihoods of entire communities or the freedom of association of an entire workforce;
- Remediability: Whether it will be difficult to restore the people impacted to a situation that is equivalent to their situation before the impact – for example where religious and cultural heritage of indigenous people has been destroyed.

Source: UN Guiding Principles on Business and Human Rights Article 14 (2011)

Table 6.3: Human Right Risks Assessment Criteria

Criteria for Severity			
Severity Level	Scale (seriousness of impact)	Scope (how many people are or will be affected)	Irremediable Nature (difficulty to restore the people impacted to a situation before impact)
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
Criteria for 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 organisation	
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.	

6.3.2 Human Rights Risk Assessment

For Human Rights Risks and Impact Assessment, there are two types of risk to consider:

- Inherent risk, which is the level of risk inherent, or natural, to the situation. It is based on the nature of the context when no mitigation measures are in place.
- Residual risk, which is the level of risk with all the measures and controls are in place.

The process to assess impact of identified human right risks is as follows.

1. Assess inherent risk level of identified human right risks using the risk criteria in **Table 6.2**, which assess the likelihood and the severity (scale, scope and remediability), and determine the significance of the risks prior to the company's implementation of control or mitigation measures.
2. Assess residual risks level by using the same assessment criteria with inherent risk level. However, in this step, the company needs to consider current mitigation measure and controls identified in 6.2. This helps assess the level of residual risk. Example of an assessment of inherent and residual risks is presented in **Figure 6.4**.

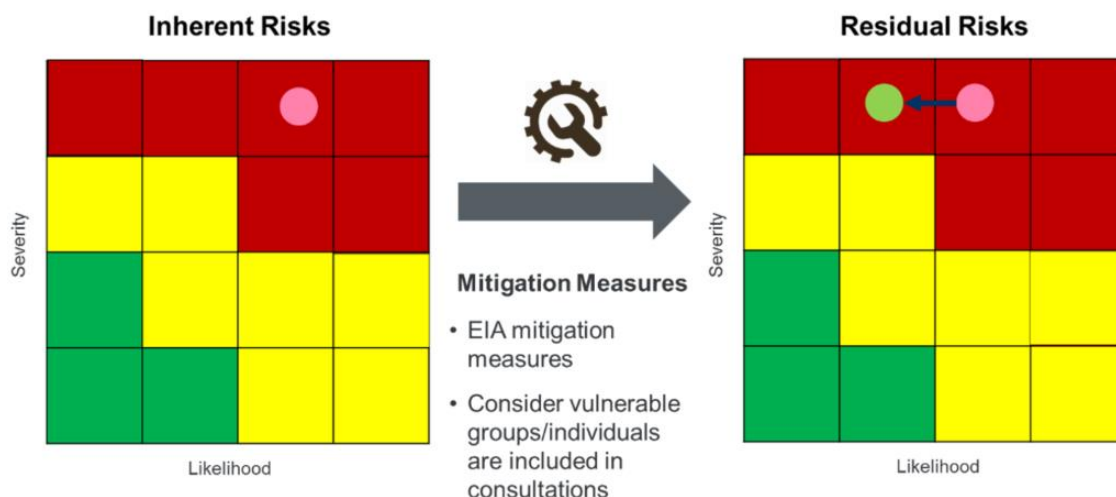


Figure 6.4: Example of an Assessment of Inherent and Residual Risks for the Company's Air Pollution Issue

3. Select the top human rights salient issues once all residual risks are finalized and placed in the matrix. The salient issues refer high priority risks that require further actions to appropriately mitigate the risks. In other words, those human rights risks are determined to have high level of impact, the company should therefore prioritize them. This can be achieved by reviewing existing risk management measure, as well as publishing additional measures to further mitigate risks. Example of salient issues is presented in **Figure 6.5**. **Table 10.2** refer to example of standard practices for human rights risk management measures.

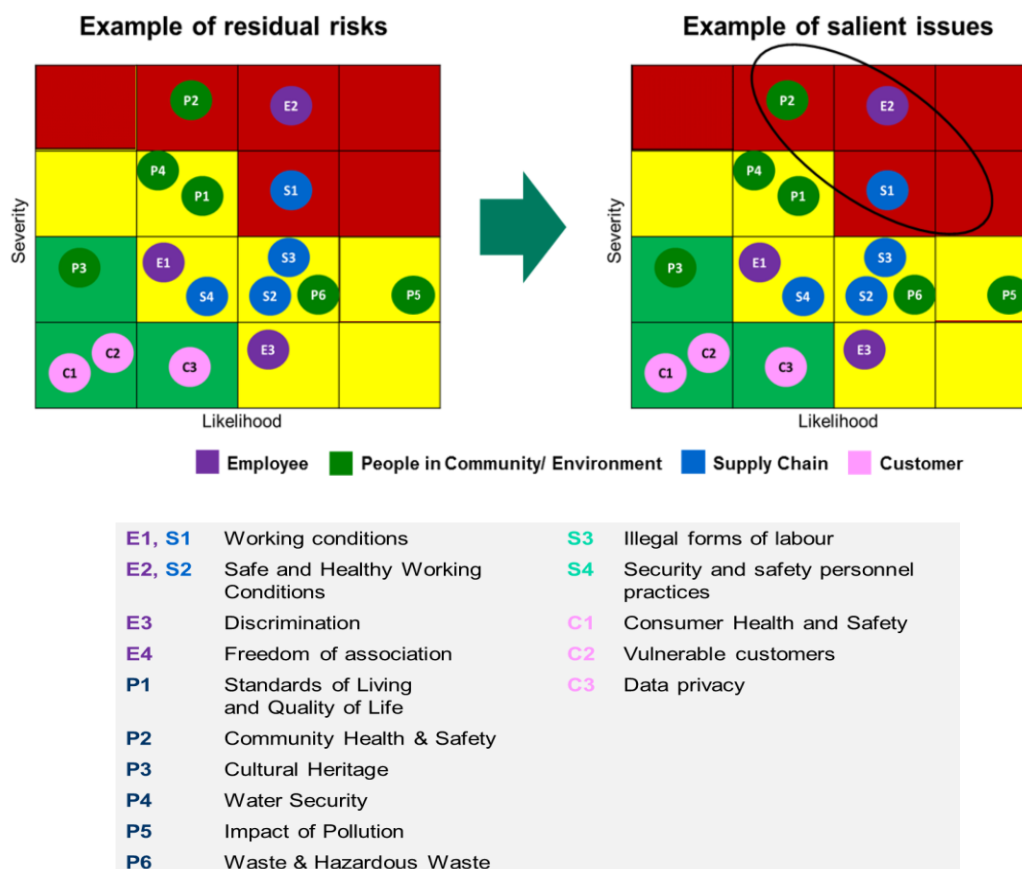





Figure 6.5: Ranking of Residual Risks or Salient Issues

6.3.3 Results of Human Rights Impacts Assessment

Results from human right risks and impacts assessment enable the company to be able to plan and manage aforementioned impacts. The company's actions depend on the level of risks. Further details are presented in **Table 6.4**.

Table 6.4: Actions for Risk Mitigation

Level of risk	Actions
 Low	The company continues existing mitigation measures and regularly monitor business activities associated with the risks.
 Medium	The company should give attention and consistently monitor particular business activities identified as having medium risk level.
 High	The company has to executive any mitigation measures immediately to lower the risk to an acceptable level.

6.4 REPORTING

Results of the assessment of both inherent and residual risk levels (identified from 6.3.2) will be consolidated in a human rights risk register, which is a human rights risk reporting tool. EGCO Group's associated functions will need to update human rights risks and impacts associated with their business activities within the risk register annually or appropriate period as agreed by EGCO. An example of human rights risk register is presented in **6.2.2**.

7 INTEGRATE FINDINGS AND TAKE APPROPRIATE ACTIONS

After identifying salient human rights issues, preventative and mitigation measures should be designed to prevent and mitigate both actual and potential human rights impacts associated with EGCO Group's business activities. The primary objective of this stage, therefore, is to design a proper management approach to address identified human rights risks – i.e. develop mitigation measures, increase human rights awareness, etc.

Gaps identified through the human rights risk and impact assessment, especially for salient issues, should be analyzed and evaluated to derive patterns or leading causes of human rights risks and violations. Then, mitigation measures may be developed in order to address those issues. These mitigation measures should include both specific measures at the operational level, as well as higher management ones that address systemic issues.

In the process of designing mitigation and management measures for human rights impacts, the company can exercise their 'leverage' with relevant departments involved with said human right risks. This influences their behaviors and lower the risks from business activities in which they are responsible for. **Table 7.1** demonstrate an example in which the company can create 'leverage.'

Table 7.1: Examples of Exercising and Increasing Leverage to Address Human Rights Impacts

Examples of types of leverage	Descriptions	Examples of exercising leverage
Traditional commercial leverage	Leverage that sits within the activities the company routinely undertakes in commercial relationships, such as contracting.	<ul style="list-style-type: none"> • Include human rights standards in contracts • Audit for compliance with the human rights standards included in the contract • Include human rights in pre-qualification criteria in bidding processes; and/or • Provide commercial incentives for suppliers that are based on human rights consideration, e.g. targets for local content
Broader business leverage	Leverage that a company can exercise on its own but through activities that are not routine or typical in commercial relationships, such as capacity building.	<ul style="list-style-type: none"> • Build the capacity of suppliers to meet the responsibility to respect human rights • Ensure that procurement and purchasing staff send the same messages on human rights in their conversations with suppliers and decision-making about contracts; and/or • Use relevant international and industry standards to drive expectations by requiring supplier compliance with such standards.
Leverage together with business partners	Leverage created through collective action with other companies in or beyond the same industry.	<ul style="list-style-type: none"> • Work with business peers to establish common requirements of suppliers; and/or • Engage bilaterally with peer companies who may be facing similar supply chain issues to share lessons learnt and to identify possible solutions.
Leverage through bilateral engagement	Leverage generated through engaging bilaterally and separately with one or more other actors, such as: government; business peers; an international organization; or a CSO.	<ul style="list-style-type: none"> • Engage CSOs and relevant international organizations who can provide relevant information on local actors or circumstances in supplier countries; and/or • Engage with a range of actors bilaterally to identify and implement solutions to specific human rights supply chain issues that have been identified.
Leverage through multi-stakeholder collaboration:	Leverage generated through collaborative action – collectively with business peers, governments, international organizations and/or NGOs or CSOs.	<ul style="list-style-type: none"> • Develop shared standards for suppliers through multi-stakeholder initiatives, thereby enhancing the credibility of the standards; and/or • Use the business's brand and reputation to convene relevant stakeholders to address any systemic issues that have been identified

Source: Human Rights Impact Assessment Guidance and Toolbox by Danish Institute for Human Rights

8 TRACKING AND COMMUNICATION

Once mitigation measures are implemented, EGCO Group will monitor and evaluate performance of these mitigation measures in terms of effectiveness on reduction of risk impact. Some examples of approaches to finding information of such performance using existing tracking processes are presented in Box 8.1.

BOX 8.1 EXAMPLES OF THE COMPANY'S EXISTING TRACKING PROCESSES

- Information from existing grievance mechanisms such as reports from whistle-blower hotlines or complaints boxes, or feedback from trade union representatives, will contain relevant information (for example, reports of allegations of worker harassment or excessive overtime);
- Employee surveys often contain valuable human rights-related information, such as experiences of discrimination, perceptions of employee engagement or the listening capacity of management;
- Internal audit processes will already include relevant indicators in many companies (i.e. auditing of investment and business projects and auditing of suppliers);
- Country reports prepared by country directors or regional offices may contain relevant information on the national human rights situation and its connection to the business.

Source: Global Compact Network Netherland, Shift and Oxfam

In addition to existing tracking channels, a set of key performance indicators on human rights is a complementary tool for EGCO Group to track and report on its human rights performance. **Table 8.1** presents a set of recommended indicators.

Table 8.1: Recommended Indicators

Topics	Examples of Human Rights Indicators
Employees practices	<ul style="list-style-type: none"> Percentage of employees that are trained on issues of human rights Average hours of trainings on labor rights for employees and executives Percentage of female employees in senior executive level Number of grievances or lawsuits related to human rights violation by the conduct of corporate .The incidents may not be expected or operation mismanagement from laws or regulation on human rights)number events on discrimination (Employees turnover rate caused by the violation of human rights, such as; employees resigning due to working unsafety or unhealthy condition
Community Rights	<ul style="list-style-type: none"> Percentage of operation or areas of operation that are assessed on human rights risks and those risks are recognized under the risk management plan Number of grievances that the company receives and resolved, such as; number of involuntary resettlements, number of cases of indigenous rights violations, and etc. Number of recurrent cases of the same incidents caused by human rights violation, such as; violation of indigenous rights
Supply chain management	<ul style="list-style-type: none"> Percentage of institutions and business units that conduct risk assessment in their supply chain)Environment, social, governance, and human rights (Percentage of suppliers that acknowledge EGCO Group sustainable supplier code of conduct Percentage of contractors that have in place Human Rights policy or guideline Percentage of suppliers that receive training on human rights Number of suppliers whose operations are assessed on sustainability)environment, social and governance, and human rights(Number of suppliers' violation cases against EGCO Group sustainable supplier code of conduct and Supplier ESG Assessment Number of disruptions or severe accidents cause by mismanagement of supply chain

9 REMEDIATE ADVERSE IMPACTS

The process to remediation should be flexible to cater to each case, but well-structured to ensure that affected individuals are adequately remediated. According to the UNGP, EGCO Group will monitor and ensure effectiveness of remediation and other processes to provide remedy for affecting stakeholders. Such criteria are presented in **Box 9.1**.

BOX 9.1 EFFECTIVENESS CRITERIA FOR NON-JUDICIAL GRIEVANCE MECHANISMS

- Legitimate: enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes
- Accessible: being known to all stakeholder groups for whose use they are intended, and providing adequate assistance for those who may face particular barriers to access
- Predictable: providing a clear and known procedure with an indicative time frame for each stage
- Equitable: seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms
- Transparent: keeping parties to a grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake
- Rights-compatible: ensuring that outcomes and remedies accord with internationally recognized human rights
- Dialogue and engagement: consulting the stakeholder groups for whose use they are intended on their design and performance, and focusing on dialogue as the means to address and resolve grievances

Source: The UNGP, Article 31

10 REFERENCES

Table 10.1 describes information sources for the development of HRIA methodology and supported data (as normative references of human rights risks and impact assessment). Sustainability and Climate Change Policy Department should be aware of human rights issues, situations, standards and law and regulation which could affect to human rights risk in business activities and impact on relevant stakeholders.

Table 10.1: Normative Reference

Normative Reference	Hyperlink	Description
International Bill of Human Rights	http://www.ohchr.org/Documents/Publications/Compilation1.1en.pdf	<p>International Bill of Human Rights consists of:</p> <ul style="list-style-type: none"> • Universal Declaration of Human Rights 1948 as the fundamental human rights framework • International Covenant on Civil and Political Rights 1966 states to Civil and Political Rights such as the right to life, the right to freedom of thought, conscience and religion, the right to freedom of association, etc. • International Covenant on Economic, Social and Cultural Rights (ICESCR) 1966 aims to ensure the protection of economic, social and cultural rights; such as, the equal right of men and women, the right to work, the right to an adequate standard of living, etc.
International Labor Organization: ILO	http://www.ilo.org/declaration/lang--en/index.htm	<p>International Labor Organization (ILO) aims to promote rights at work, encourage decent employment opportunities, enhance social protection and strengthen dialogue on work-related issues.</p> <p>The ILO Declaration on Fundamental Principles and Rights at Work consists of principles and rights in four categories, whether or not they have ratified the relevant Conventions:</p> <ul style="list-style-type: none"> • Freedom of association and the effective recognition of the right to collective bargaining; • The elimination of forced or compulsory labor; • The abolition of child labor; and • The elimination of discrimination in respect of employment and occupation

Normative Reference	Hyperlink	Description
Business & Human Rights Resource Center	http://business-humanrights.org/en/regions-countries	Business & Human Rights Resource Center is the knowledge hub that tracks human rights policy and performance of various global industries. However, the Business & Human Rights Resource Center still lacks overview of crucial human rights issues in each country. Business & Human Rights Resource Center commits to represent fairly all sides of debates on business and human rights issues, including highlighting good practice as well as criticisms of companies' impacts which are advocated by civil society organizations, media agencies, companies and governments.
	http://business-humanrights.org/en/sectors	Business & Human Rights Resource Center presents case studies and human rights data which are link to various business sectors.
International Finance Corporation (IFC)	http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/guide+to+human+rights+impact+assessment+and+management/guide+to+hriam/tables/hriam+table/hriam+table	International Finance Corporation (IFC) provides a principle-based framework, best practices, resources and networking events related to human rights. IFC presents a linkage among human rights with business risks, impacts and opportunities; which can be used as a human rights identification manual in individual level in operating areas.
Danish Institute for Human Rights	https://www.humanrights.dk/business/tools/human-rights-impact-assessment-guidance-and-toolbox	Human Rights Impact Assessment Guidance and Toolbox illustrates approach for human rights risk and impact identification and mitigation measures to respond those identified risks and impacts. The Human Rights Impact Assessment Guidance and Toolbox by Danish Institute for Human Rights is internationally recognized tool for human rights impact assessment, which consists of following steps: <ul style="list-style-type: none"> • Planning and scoping; • Baseline data collection; • Impact assessment; • Mitigation and management; and, • Reporting and evaluation.
Office of the High Commissioner for Human Rights (OHCHR)	http://www.ohchr.org/EN/Countries/Pages/HumanRightsintheWorld.aspx	Office of the High Commissioner for Human Rights (OHCHR) represents the world's commitment to universal ideals of human dignity. Human rights reporting, such as concluding observations, are provided specific recommendations of human rights to country members of United Nation (UN).

Normative Reference	Hyperlink	Description
World Report by Human Rights Watch	https://www.hrw.org	Human Rights Watch is a non-profit/ non-governmental human rights organization which is known for its accurate fact-finding, impartial reporting, effective use of media, and targeted advocacy, often in partnership with local human rights groups. The organization has published the World Report which is assessed the human rights risks and impacts in a country worldwide. The Report aims to promote civil and political rights rather than social, economic and cultural risks.

Table 10.2 describes example for the standard practices of human rights risks and impact assessment in which cover the existing practices of EGCO Group and best practices from peers.

Table 10.2: List of Standard Practices

	Existing Human Rights Issues	EGCO Group: Existing Practices and Proposed Practices	Peers: Standard Practices
Employee Practices			
1	Working conditions (Domestic & Overseas) (incl. COVID-19 complications of employees' unfair dismissal and work from home condition)	<ul style="list-style-type: none"> - Compliance with labour regulations <i>Applied by Business activities:</i> <ul style="list-style-type: none"> > Power Production > Services > Supporting activities > Joint Ventures 	-
		<ul style="list-style-type: none"> - Representation and leadership by Welfare Committee <i>Applied by Business activities:</i> <ul style="list-style-type: none"> > Power Production > Services > Supporting activities > Joint Ventures 	-
		<ul style="list-style-type: none"> - Maternity leave (120 days compared to the legally required 98 days) and paternity leave (15 days compared to the legally required 2 days) and pays wages over the law required (45 days) <i>Applied by Business activities:</i> <ul style="list-style-type: none"> > Power Production > Services > Supporting activities > Joint Ventures 	GC: Pays wages during the maternity leave but not to exceed 70 days.
		<ul style="list-style-type: none"> - Paid leave for Buddhist meditation practice <i>Applied by Business activities:</i> <ul style="list-style-type: none"> > Power Production > Services > Supporting activities > Joint Ventures 	PEA: Paid ordination leave up to 120 days in the lent period or up to 45 days out the lent period.

	Existing Human Rights Issues	EGCO Group: Existing Practices and Proposed Practices	Peers: Standard Practices
		<p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Supporting activities > Joint Ventures 	Bangchak: Has Bangchak Corporation Public Company Limited Provident Fund which employees can choose the accumulated at a rate of five or ten or fifteen percent of the salary and the Company will pay the same rate but not over ten percent to the Fund.
		<p>- Grievance mechanisms and whistleblower policy</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Supporting activities > Joint Ventures 	Thaioil: Whistle-blowing mechanisms with protection of complainants, whistle-blowers, and related parties
		<p>- Working condition audit by third-party against regulatory requirements or international standards e.g. IFC, ILO</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Supporting activities 	-
		<p>- Working conditions policy and procedure e.g. human resource manual, employee manual, etc.</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Supporting activities 	-
		<p>- Covid-19 Implementation</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Supporting activities > Joint Ventures 	<p>Cohen Milstein (law firm): announce the workers' rights and the Coronavirus policy as a civil rights & employment</p> <p>Coca Cola HCCB: allow permanently remote working for employees who are not required to be physically present at the work location.</p>
2	Health and Safety (incl. COVID-19 complications to health and safety)	<p>- Compliance with regulations related to labour, occupational health and safety, and environment</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Supporting activities > Joint Ventures 	N/A
		<p>- Representation and leadership by committees such as Welfare Committee and Safety Committee</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Supporting activities > Joint Ventures 	N/A
		<p>- Safety, Health, and Environmental (SHE) Management Standards Guideline</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services 	N/A

	Existing Human Rights Issues	EGCO Group: Existing Practices and Proposed Practices	Peers: Standard Practices
		<ul style="list-style-type: none"> > <i>Supporting activities</i> > <i>Joint Ventures</i> 	
		<ul style="list-style-type: none"> - Emergency response plans <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Services</i> > <i>Supporting activities</i> > <i>Joint Ventures</i> 	N/A
		<ul style="list-style-type: none"> - Environmental Management System (EMS) in accordance with ISO 45001: 2018 and an established EMS Committee/ organization <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Services</i> > <i>Supporting activities</i> > <i>Joint Ventures</i> 	<ul style="list-style-type: none"> - Bangchak: EMS in accordance with ISO 14001: 2015 regarding the use of natural resources and pollution control - PTTEP: Certified ISO 45001: 2018 for Occupational Health and Safety Management System
		<ul style="list-style-type: none"> - Procedures to identify hazards and safety risks and risk assessment process <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Services</i> > <i>Supporting activities</i> > <i>Joint Ventures</i> 	<p>Thaioil: In the event that workers (employees and contractors) notice or experience working conditions that pose risks to their health and/or life, they can stop the work and report to the supervisor and the officer in charge of the operation area.</p>
		<ul style="list-style-type: none"> - Safety training plan for employees by laws and based on risk assessment, e.g. personal protective equipment (PPE), machinery safety, confined space, emergency response, etc. - Record keeping <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Services</i> > <i>Supporting activities</i> > <i>Joint Ventures</i> 	<p>PTTGC: B-CAREs Project emphasizes safe working behaviors, risk assessments, and being aware of potential accidents in the workplace. PTTGC also has many activities leading to Management Safety Leadership Commitments by executives at different levels and safety engagement by its employees.</p>
		<ul style="list-style-type: none"> - OHS target and OHS performance tracking e.g. accident statistics, and investigation report <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Services</i> > <i>Supporting activities</i> > <i>Joint Ventures</i> 	<p>GPSC: The Company set the target of OHS for zero Lost Time Injury Frequency Rate (LTIFR) for seven consecutive years, from 2013 until the present (as of December 2019). Furthermore, the Company also collect the accident statistics. Presently, the company's statistics show 9,440,929 consecutive accident-free work hours. The aim is for 10,000,000 consecutive accident-free work hours.</p>
		<ul style="list-style-type: none"> - OHS practices audit by third-party or competence auditor <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Services</i> > <i>Supporting activities</i> > <i>Joint Ventures</i> 	<p>PTTGC: Third party verified on OHS performance (Type of injury and rates of injury as LTIFR, occupational diseases, lost days and total number of work related fatalities (GRI 403-9 and 10,)) in accordance to the sustainability reporting standard (GRI Standards)</p>
		<ul style="list-style-type: none"> - Covid-19 Implementation <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Services</i> > <i>Supporting activities</i> 	<p>ThaiBev: consider draw up pandemic preparedness, risks concerns and actions, and its plan for relevant stakeholder</p> <p>Enel: draw up COVID-19 insurance policy for all its global employees</p>

	Existing Human Rights Issues	EGCO Group: Existing Practices and Proposed Practices	Peers: Standard Practices
		> <i>Joint Ventures</i>	
3	Discrimination in the workplace	<p>- Compliance with Labour Protection Act of Thailand</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Supporting activities</i> > <i>Joint Ventures</i> <p>- Employee Code of Conduct prohibits discrimination</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Supporting activities</i> > <i>Joint Ventures</i> <p>- Policy on employment of the disabled</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Supporting activities</i> > <i>Joint Ventures</i> <p>- Human Rights Policy addressing discrimination issue</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Supporting activities</i> > <i>Joint Ventures</i> <p>- Whistle blowing channel or hotline for reporting on discrimination issues</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Supporting activities</i> > <i>Joint Ventures</i> 	<p>Unilever: Implement framework for Fair Compensation to all employees regardless of discrimination and cascade such Framework to its suppliers through Responsible Sourcing Policy.</p> <p>GPSC: For complaints concerning human rights issues (includes discrimination), the company has provided various channels for all groups of stakeholders. Internal complaint channels for employees include the welfare committee and company's suggestion box. Meanwhile, complaint channels for nonemployees are available via the company's website, as well as by telephone, fax and letter.</p>
4	Freedom of association and assembly	<p>- Employee Welfare Committees/ OHS Committee</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Supporting activities</i> > <i>Joint Ventures</i> <p>- Human Rights Policy addressing freedom of association and assembly/ Human Resource Policy addressing freedom of association of employees</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> > <i>Supporting activities</i> > <i>Joint Ventures</i> <p>- Two-way communication channels: Employees have the right to express opinions and exchange ideas with their supervisors and executives through the channels provided by the company such as workshops/ sessions</p> <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > <i>Power Production</i> 	<p>Unilever: the Company approach to freedom of association is carried through to our suppliers via its Responsible Sourcing Policy. One of its Fundamental Principles (8) is that all workers are free to exercise their right to form and/or join a trade union of their choice.</p>

	Existing Human Rights Issues	EGCO Group: Existing Practices and Proposed Practices	Peers: Standard Practices
		> Supporting activities > Joint Ventures	
5	Right to freedom of opinion, information and expression	Right to freedom of opinion/speak policy Applied by Business activities: > Supporting activities > Joint Ventures	Nestle: The Company promotes an inspiring, innovative, transparent and open work environment, where each employee is respected, has the liberty to engage, create and contribute, always with the ability to speak up. Employees have their rights to speak up in any matter
6	Transparency and anti-corruption	- Anti-corruption policy - Codes of Business Conduct - Gift policy Applied by Business activities: > Joint Ventures	ThaiBev: ThaiBev’s anti-corruption policy has established practices to protect against corruption and also has established its Code of Business Conduct with the intention of integrity, legal compliance, and the observance of morality and ethics. IRPC: a set of guidelines for receiving and offering gifts, hospitality, and other benefits (No Gift Policy) under IRPC’s Anti-Corruption Policy was developed as a standard of business conduct to ensure transparency, efficiency, sustainable growth, and dignity.
		- Whistle Blowing Channel - Process for receiving and handling complaints Applied by Business activities: > Joint Ventures	PTT: The Company has set the Complaint & Whistleblowing Policy and the process to handling complaints with fair treatment
Procurement practices			
1	Discrimination	- Procurement policy Applied by Business activities: > Services	Mearsk: The Company has its procurement policy for responsible procurement including unfair selection of supplier
Community and Environment Practices			
1	Community Standard of Living (Reduced Incomes and Increased Migration)	- Releasing fish, shrimps, and crabs in local ecosystems to boost population Applied by Business activities: > Power Production > Services > Joint Ventures	Thaioil: Crab Bank, Community Fishery Center and Local Marketplace - Conducting feasibility study with communities in the area to create a balanced coastal resource management system, serving as crab hatchery and conservation, prior to them being released to the sea. This builds sustainability for fishery industry. GPSC: GPSC implement the project to improve quality of life for local community named 'GPSC ร่วมใจ รวมไทย ช่วยชาติ'
		- Supporting local employment Applied by Business activities: > Power Production > Services > Joint Ventures	
		- Organizing CSR projects for local communities that increase incomes, such as development of agricultural products Applied by Business activities: > Power Production > Services > Joint Ventures	
		- Regular community engagement e.g. community survey Applied by Business activities: > Power Production > Services > Joint Ventures	

	Existing Human Rights Issues	EGCO Group: Existing Practices and Proposed Practices	Peers: Standard Practices
		<ul style="list-style-type: none"> - EIA mitigation measures - related to economic of community <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Joint Ventures 	
2	Community health and safety (Explosion and Road Accidents)	<ul style="list-style-type: none"> - (Explosion) EIA mitigation measures <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Joint Ventures 	CKPower: The Company shall make mandatory Environmental Impact Assessment (EIA) which includes the mitigation measures to be in line with the laws and regulations before project constructions.
		<ul style="list-style-type: none"> - (Explosion) Safety systems that are regularly inspected and reported to local authorities <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Joint Ventures 	N/A
		<ul style="list-style-type: none"> - (Explosion) <ul style="list-style-type: none"> - Support communities in terms of emergency circumstance, disasters, etc. - Communicate emergency response plan and drill practice with communities <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Joint Ventures 	PPT: The Company shall establish, implement, and maintain a procedure to identify the potential for emergency situations which in line to the OHSAS18001: 2007
		<ul style="list-style-type: none"> - <u>Road Accidents</u> <ul style="list-style-type: none"> - Speed limits - GPS system to track drivers performance - Driver training and testing quarterly, once a year - Alcohol and drug testing before work commencing - Performance award for zero accident - Driving performance target <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Joint Ventures 	SGC: Implements “Kabdee”, innovation for safety driving. The application will detect signs of fatigue, exhaustion, drowsiness associated to the conditions leading to accident, the system will alert the driver with a beep sound and vibration.
3	Water Usage	<ul style="list-style-type: none"> - Water stress assessment - Implementation of Water reduction target, action plans and performance tracking - Community engagement through CSR program related to Water e.g. supply Water to Community during the drought <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production 	Enel: The Company assess risk of water scarcity and approach to mitigate by the Company's development strategy to reduce water consumption. Furthermore, Enel has set the goal and create the projects to save the water consumption, e.g. Nanotechnologies to save water and water&biodiversity project

	Existing Human Rights Issues	EGCO Group: Existing Practices and Proposed Practices	Peers: Standard Practices
4	Water Discharge	<ul style="list-style-type: none"> - Water discharge quality control - Water discharge target - Installation of wastewater treatment system to control water discharge quality according to the regulation requirements <p><i>Applied by Business activities:</i> > <i>Power Production</i></p>	Enel: The Company has set the commitment to increase wastewater reuse at its plants by installs FGD Wastewater treatment to stop the water discharge into the sea and improve the quality of water under the project Zero Liquid Discharge (ZLD)
5	Land and Property Acquisition	<ul style="list-style-type: none"> - Criteria/ Process to estimate the impact from land acquisition covering individuals' or communities' land rights <p><i>Applied by Business activities:</i> > <i>Power Production</i> > <i>Joint Ventures</i></p>	Sansiri: The Company has its process to study the feasibility of the project development and analyze the risks and key legal and regulatory issues involved for the land and property acquisition.
		<ul style="list-style-type: none"> - Record keeping (e.g. land titles) <p><i>Applied by Business activities:</i> > <i>Power Production</i> > <i>Joint Ventures</i></p>	Land Laws: The Company keep records on land titles document, e.g. NS4, NS3
		<ul style="list-style-type: none"> - Implement land occupy according by laws <p><i>Applied by Business activities:</i> > <i>Joint Ventures</i></p>	N/A
6	Noise Pollution	<ul style="list-style-type: none"> - Installation of noise barrier at high noise area <p><i>Applied by Business activities:</i> > <i>Power Production</i> > <i>Services</i> > <i>Joint Ventures</i></p>	B.Grimm: Reducing noise at source, at conductor/sound transmission, and noise recipient prevention
		<ul style="list-style-type: none"> - Noise level monitoring program - Hearing conservation program - Health check program at least once a year for audiotesting <p><i>Applied by Business activities:</i> > <i>Power Production</i> > <i>Services</i> > <i>Joint Ventures</i></p>	Thaioil: Thaioil observe the noise pollution of small power plant project and the results complies with the standard. The Company also initiate hearing conservation program by develop the noise contour map and hearing test to its employees
		<ul style="list-style-type: none"> - PPE program for working with high noise <p><i>Applied by Business activities:</i> > <i>Power Production</i> > <i>Services</i> > <i>Joint Ventures</i></p>	3M: The Company educates employees and its supplier on the safety at work, including the noise issues. The company provides a suitable variety of hearing protection devices.

	Existing Human Rights Issues	EGCO Group: Existing Practices and Proposed Practices	Peers: Standard Practices
7	Air Pollution	<ul style="list-style-type: none"> - Air quality monitoring program e.g. stacks and ambient Air - Installation of Air emission control system e.g. dust collector, wet scrubber, FDG, etc. - Low SO₂ coal and fuel - Operational control to minimize Air pollution release from the Process e.g. O₂ level, etc. - Installation of continuous monitoring system at stack e.g. CEMS <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Joint Ventures 	<p>B.Grimm:</p> <ul style="list-style-type: none"> - Installed Dry Low NO_x Burner combustion Systems to control NO_x from gas turbine power generators - Install a Continuous Emission Monitoring System (CEMS), stack sampling and heat recovery steam generators (HRSG) to measure NO_x, Sulfur dioxide (SO₂), TSP, Oxygen (O₂), stack temperature and gas flow rate - Conduct air quality measurements in the community areas surrounding power plants every 6 months to measure NO_x, SO₂ and TSP
8	Odor	<ul style="list-style-type: none"> - Installation of odor treatment system based on risk e.g. wet scrubber - odor monitoring program - Community survey annually regarding to odor impact <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Joint Ventures 	<p>Thaioil: The Company conducted a study on volumes of benzene released at source, such as through Effluent Treatment Plant (ETP), flare, combustion, fugitives, tank and product loading area. This is to help reduce odor and volume of VOCs</p>
9	Waste & Hazardous waste	<ul style="list-style-type: none"> - Waste management system within the factory <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Joint Ventures <ul style="list-style-type: none"> - 3R program development and implementation <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Services > Joint Ventures 	<p>Gulf:</p> <ul style="list-style-type: none"> - Value-added sediment from water treatment process into fertilizer, bricks, and flower pots - Implement Zero Waste to landfill project <p>GPSC: Organizing projects and activities in communities, such as waste banks, waste donation for charity, basic waste-sorting and organic waste management in households, waste-sorting training in schools, waste-upcycling projects and green markets project</p>
10	Biodiversity	<ul style="list-style-type: none"> - Biodiversity policy - Implemented measures during the plant work site phase (e.g. during the construction) - Long-term setting goals and commitment of Biodiversity - Projects implementation for conserving biodiversity, species, and environment <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production 	<p>Enel: preserved environment by establish a specific biodiversity policy and undertakes to plan activities that can interfere with natural species and habitats by respecting the principle of "no net loss" of biodiversity and, where applicable, with a positive net balance</p>
Customer practices			
1	Customer data privacy	<ul style="list-style-type: none"> - Privacy policy - Grievance mechanisms and handling process - Data Subject Rights Request - Cybersecurity measures <p><i>Applied by Business activities:</i></p> <ul style="list-style-type: none"> > Power Production > Supporting activities 	<p>GC: The Company has its privacy policy and the process of grievance mechanisms and handling process. GC has set the cybersecurity measures to make sure that the company does not have its potential to customer discrimination issues</p>

	Existing Human Rights Issues	EGCO Group: Existing Practices and Proposed Practices	Peers: Standard Practices
2	Customer discrimination	- Diversity and inclusion policy <i>Applied by Business activities:</i> > <i>Power Production</i> > <i>Supporting activities</i>	Enel: The Company establish Diversity and Inclusion policy which covers the non-discrimination, equal opportunities, and inclusion of diversity throughout the value chain

Remark:

- Power Productions consist of Electricity generation, Electricity & Stream generation (Cogen), and Electricity & Wind power generation.
- Services consist of O&M service and O&M Engineering&Construction.
- Supporting activities consist of Human resources, Procurement, and Sale/Customer service.

11 ATTACHMENTS

Attachment 1 Supporting documents from EGCO GROUP human rights due diligence

Attachment 2 Human Rights Risk Register