

The World's Most Sustainable Transportation Company



Human Rights Due Diligence Report 2023/24

BTS GROUP HOLDINGS PCL

Human Rights Due Diligence Process

BTS Group Holding Public Company Limited (BTS Group) has systematically conducted and reviewed human rights due diligence process every 3 year to assess actual and potential human rights impacts related to BTS Group. BTS Group's human rights due diligence process consists of five stages, which are implemented and developed in adherence to the UN Guiding Principles on Business and Human Rights (UNGPs).



Reference: the UN Guiding Principles on Business and Human Rights (UNGPs)

Remediation:

- Taking remediation actions to address impacts, and remedy stakeholders and vulnerable groups, who are affected by BTS Group's adverse human rights impacts and whose human rights are affected by BTS Group's business activities, value chain and new business relations (mergers, acquisition, joint ventures).

Monitoring and Communication:

- Routinely monitoring and tracking the implemented actions to ensure their quality and effectiveness.
- Communicating about the implemented actions – for example, relevant risks to prevent and mitigate, mitigation actions/measures and their effectiveness, progress – publicly.

Policy Commitment:

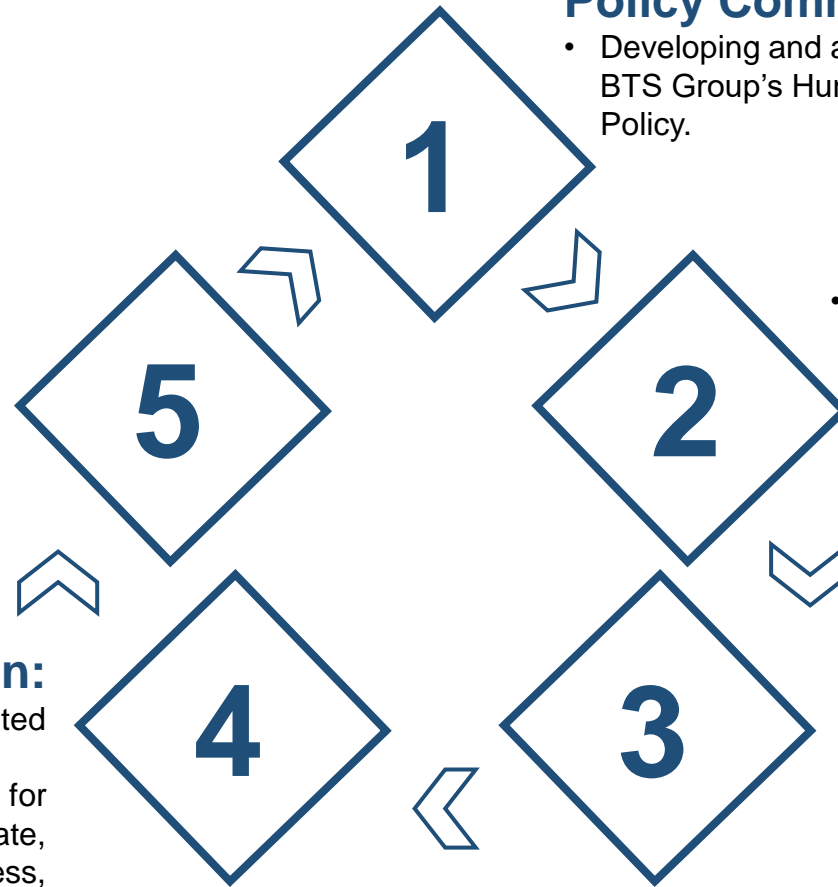
- Developing and announcing BTS Group's Human Rights Policy.

Assessing Risks and Impacts (Human Rights Risk Assessment):

- Identifying, reviewing, analysing and assessing actual and potential human rights issues, risks and impacts.

Integration and Taking Action:

- Integrating results and findings from the assessment (the 2nd stage) into decision-making activities to design and take actions upon these inputs, such as developing mitigation actions/measures, as well as implement these actions efficiently.



Human Rights Policy

BTS Group Holdings Public Company Limited (the Company) is committed to maintaining its position as a sustainable and responsible organisation. To that end, the Company ensures that the treatment of its customers, employees, communities, and business partners is centered on their well-being and maximises the shared value created for them as well as the Company and its subsidiaries (BTS Group or the Group). In this regard, the Company conducts a periodic human rights due diligence in all of the Group's value chains as firmly stated in its Code of Business Conduct and is committed to respecting human rights in accordance with internationally accepted standards that have been mentioned as the guiding standards for the policy development.

To ensure compliance with human rights principles and articulate the Group's commitment towards responsible and transparent business operations, the Company published a Human Rights Policy in 2018. The Human Rights Policy (the Policy) is founded upon international human rights laws and standards, including the International Bill of Human Rights; the Universal Declaration of Human Rights (UDHR); the International Covenant on Civil and Political Rights (ICCPR); the International Covenant on Economic, Social and Cultural Rights (ICESCR); the UN Global Compact (UNGC); the Convention on the Rights of the Child; the Convention on the Rights of Persons with Disabilities; and the ILO Declaration on Fundamental Principles and Rights at Work. The Policy also reflects the "Protect, Respect, and Remedy", or the Ruggie Framework, and other expectations expressed in the UN Guiding Principles on Business and Human Rights. This Policy shall serve as BTS Group's official group-wide corporate standards on human rights management to ensure standardised management across all activities.

BTS is committed to preventing situations related to human rights violations from occurring – for example, human trafficking, forced labour, child labour, discrimination and harassment. In addition, BTS is committed to respecting human rights associated to these situations, i.e., the right to collective bargaining and freedom of association as well as ensuring the fair systematic treatment on equal remuneration.

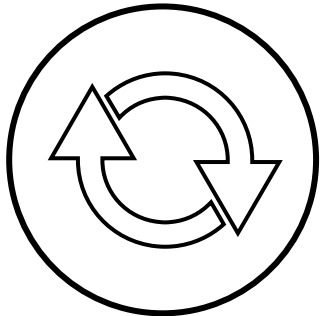
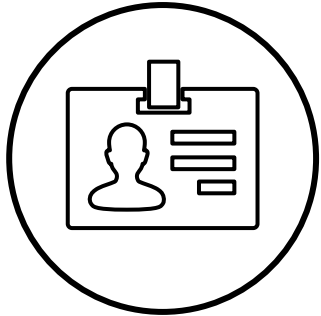
Source: *BTS Group Human Rights Policy*

- ✓ The scope of the human rights policy refers to BTS Group's expectation on human rights compliance not only in their own operation but also subsidiaries, joint-venture, business partners and new business relations.
- ✓ BTS Group has made commitments in relation to the human rights focusing four areas: employees, communities, suppliers & sub-contractors and customers.
- ✓ BTS is committed to prevent situations related to human rights topics in the policy are, for example, human trafficking, forced labor, child labor, discrimination and harassment, the rights to collective bargaining and freedom of association as well as ensuring the fair systematic treatment on equal remuneration.

Scan QR Code for the Human Rights Policy



2 Human Rights Risk Assessment – 1



In order to identify human rights risks and prevent human rights violations or other adverse impacts on human rights from occurring in its operations, BTS Group has performed the human rights risk assessment that covers BTS Group's own operations, business activities, value chain and new business relations (mergers, acquisition, joint ventures). This human rights risk assessment is part of the human rights due diligence process, and allows BTS Group to identify, prevent, and mitigate human rights risks throughout the activities of its direct operations, subsidiaries as well as activities, which are related to the aforementioned new business relations.

2 Human Rights Risk Assessment – 2

BTS Group has identified, reviewed, analysed and assessed human rights issues, risks and impacts of BTS Group's own operations, business activities, value chain and new business relations (mergers, acquisition, joint ventures) every 3 years. The systematic processes for identifying and reviewing risks and impacts are as follows:

1

Risk Identification:

- ✓ Review the risk mapping of potential issues.
- ✓ Identify actual human rights impacts that were occurred in the past.
- ✓ Identify actual and potential human rights issues, risks and impacts of BTS Group's own operations, business activities, value chain and new business relations (mergers, acquisition, joint ventures).
 - ✓ Examples of the issues that are covered in risk identification process are illegal forms of labors (i.e. child labor, forced labor, human trafficking), freedom of association, right to collective bargaining, working condition (i.e. working hours), equal remuneration, discrimination, privacy and security forces.
- ✓ Cover stakeholders and vulnerable groups at risk of the aforementioned human rights issues.
 - ✓ Stakeholders and vulnerable groups who are covered in risk identification process are own employees, women, children, indigenous people, migrant people/workers, third-party employees, local communities, customers, people with mobility impairments, LGBTQI+, pregnant women and elderlies.
- ✓ Identify potential human rights that could be impacted by human rights issues, caused by BTS Group's business activities value chain and the new business relations.

2

Assessing Inherent Risk:

- ✓ Conduct human rights inherent risk assessment without the consideration of existing mitigation measures/actions.
- ✓ Rank inherent risks based on severity and likelihood levels.

3

Analysing and Identifying Mitigation Measures/ Actions:

- ✓ Investigate to analyse and identify existing mitigation measures/ actions being implemented to handle and manage inherent risks.

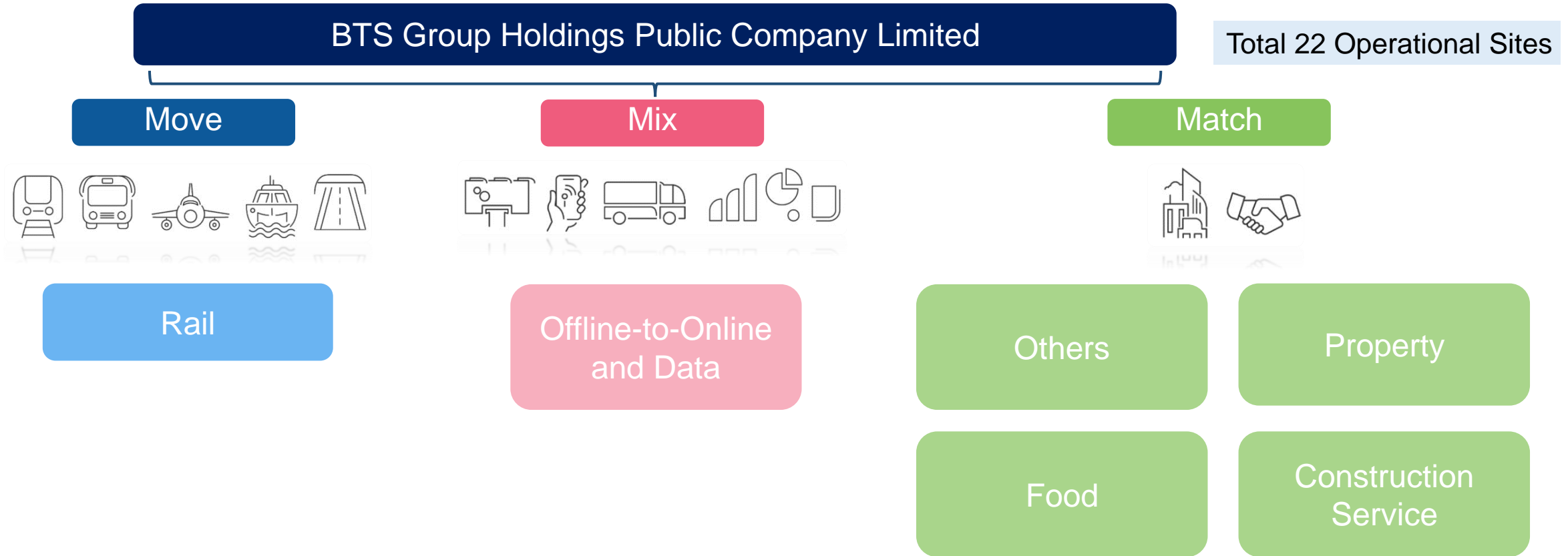
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Assessing Residual Risk:



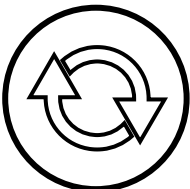

- ✓ Conduct human rights residual risk assessment with the consideration of existing mitigation measures/actions.
- ✓ Rank residual risks based on severity and likelihood levels.
- ✓ Prioritise human rights salient issues (issues with high risks).

2 Human Rights Risk Assessment – 3

BTS Group has defined the coverage of human rights risk assessment which include own operations, subsidiary, and joint ventures with management control as follows:



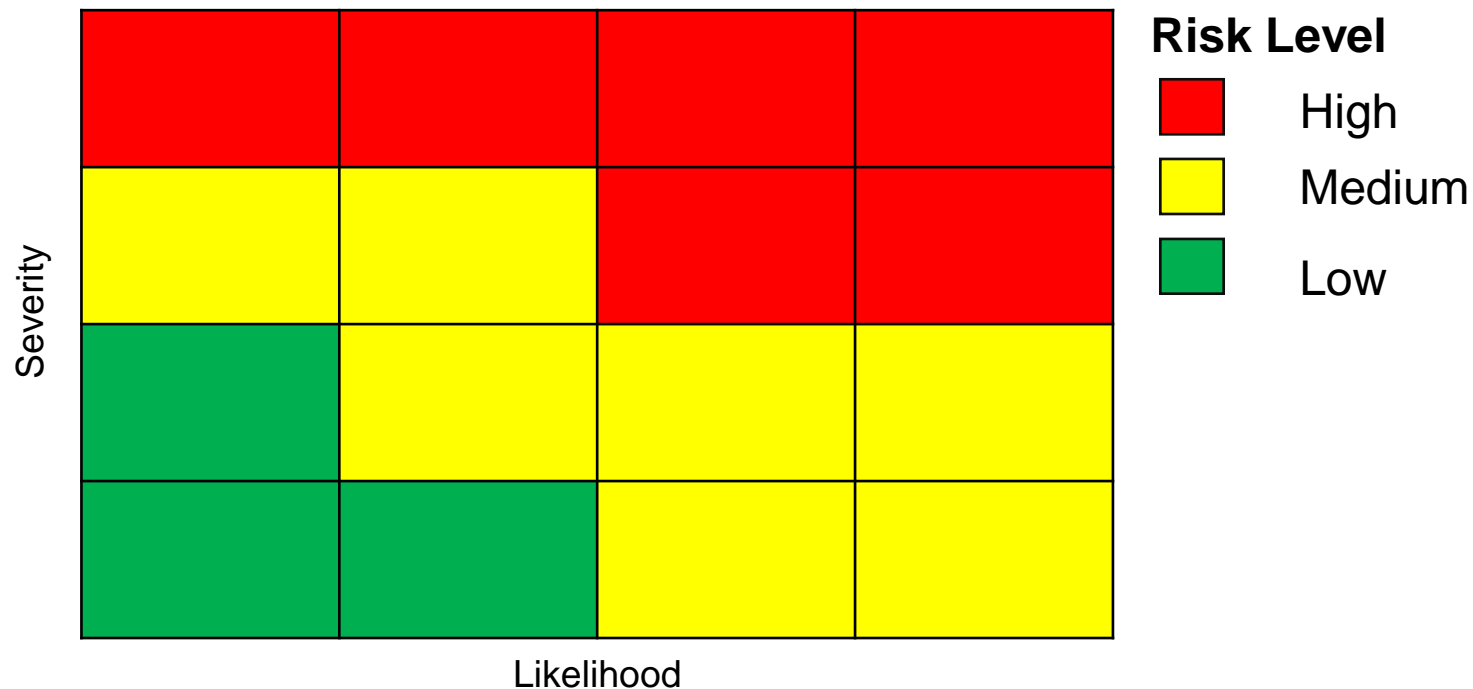
1 Risk Identification:

<u>Human Rights Issues</u>		<u>Rightsholder and Vulnerable Groups at Risk</u>
 <p>Employees</p>	<ul style="list-style-type: none"> Occupational Health and Safety Working Condition Discrimination and Harassment (including equal remuneration) Freedom of Association and Collective Bargaining, and the right to collective bargaining Illegal Forms of Labors (e.g. Child labor, Forced labor, Human Trafficking) 	<p>Own employees (including men, women, pregnant women, LGBTQI+, migrant people/workers and people with mobility impairment)</p>
 <p>Customers</p>	<ul style="list-style-type: none"> Health and Safety Data Privacy Discrimination and Harassment Security Forces 	<p>Customers (including men, women, pregnant women, LGBTQI+, people with mobility impairment and indigenous people)</p>
 <p>Supplier and Contractor</p>	<ul style="list-style-type: none"> Occupational Health and Safety Working Condition Discrimination and Harassment Vendor Discrimination 	<p>Suppliers or contractors who are working in BTS Group's operational area (including men, women, pregnant women, LGBTQI+, and people with mobility impairment, migrant people/workers and third-party contracted labor)</p>
 <p>Community</p>	<ul style="list-style-type: none"> Health and Safety Standard of Living Land Acquisition and Forced Resettlement 	<p>Community members (including women, children, indigenous people, people with mobility impairment, LGBTQI+, pregnant women and elderlies)</p>

2-4 Assessing inherent risks, analysing and identifying mitigation measures/ actions, and assessing residual risks:

Human Rights Matrix

During human rights risk assessment, the 4x4 matrix below is used to rank human rights risks (both inherent and residual risks) by considering the likelihood of risk occurrences and severity of risks towards rights holders. The likelihood of risks to occur is located along the x-axis, whereas the severity of risks is situated along the y-axis. Levels of risks are categorised into 3 levels, including High (red), Medium (yellow) and Low (green). After considering residual risks, human rights risks that are ranked at “High” level are considered as human rights salient issues (issues with high risks) for BTS Group.



2-4 Assessing inherent risks, analysing and identifying mitigation measures/ actions, and assessing residual risks:

Human Rights Risk Assessment Criteria: 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

2-4 Assessing inherent risks, analysing and identifying mitigation measures/ actions, and assessing residual risks:

Human Rights Risk Assessment Criteria: 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.
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.

Likelihood will be considered based on the local environment or context – the likelihood of a risk occurring is greater in a high risk operating environment (UN Guiding Principle 19).

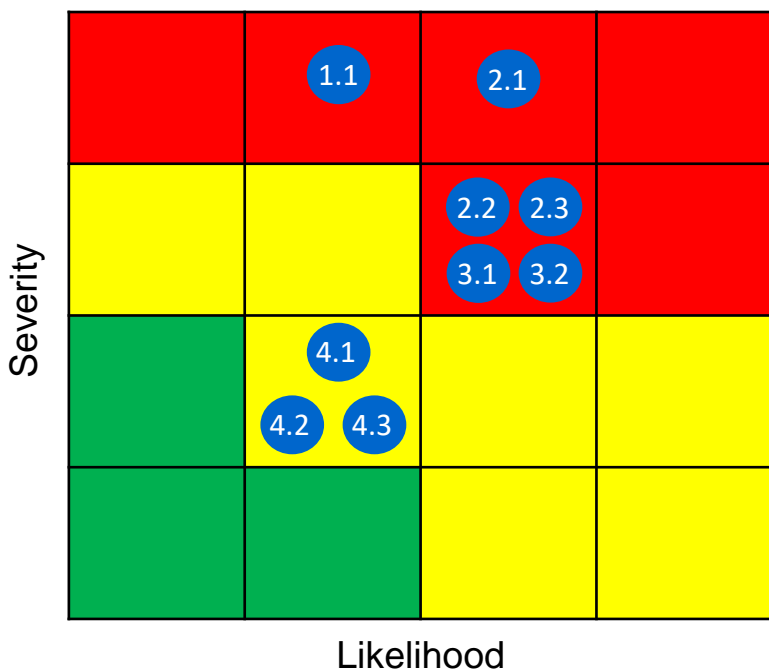
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Human Rights Risk Assessment – 8



2-4 Assessing inherent risks, analysing and identifying mitigation measures/ actions, and assessing residual risks:

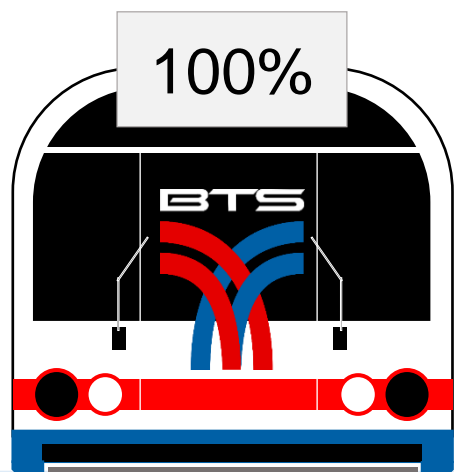
Results of Human Rights Risk Assessment: BTS Group’s Human Rights Salient Issues



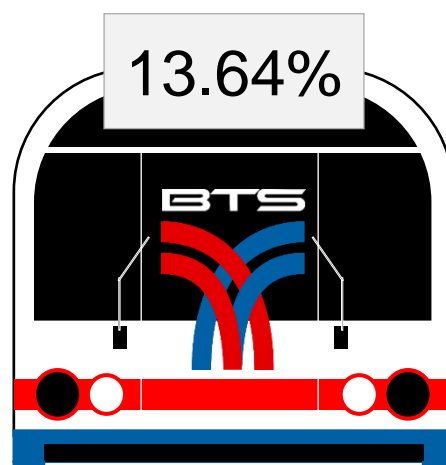
#	Operational Site	Rightsholder	Human Rights Salient Issues
1	1.1 Bangkok Mass Transit System PCL	Employee	Occupational Health and Safety
2	2.1 Bangkok Mass Transit System PCL 2.2 Northern Bangkok Monorail Co., Ltd. 2.3 Eastern Bangkok Monorail Co., Ltd.	Customer	Health and Safety
3	3.1 Northern Bangkok Monorail Co., Ltd. 3.2 Eastern Bangkok Monorail Co., Ltd.	Community	Health and Safety
4	4.1 Bangkok Mass Transit System PCL 4.2 Northern Bangkok Monorail Co., Ltd. 4.3 Eastern Bangkok Monorail Co., Ltd.	Suppliers	Occupational Health and Safety

2-4 Assessing inherent risks, analysing and identifying mitigation measures/ actions, and assessing residual risks:

Results of Human Rights Risk Assessment: Overview results (BTS Group's own operation, subsidiaries and JV with management control)

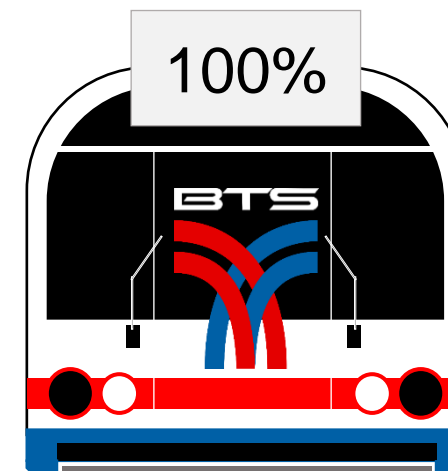


All 22 operational sites of BTS Group were assessed for potential human rights risk.



Out of the total 22 operational sites operated by BTS Group, 13.64% (3 Sites) were found to have identified risks. These risks were recognised during the assessment which include:

- Employee Occupational Health and Safety
- Customer Health and Safety
- Community Health and Safety

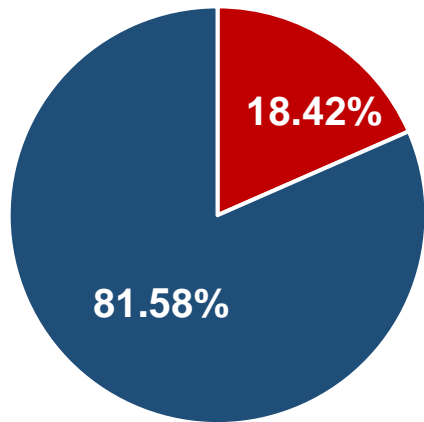


All of BTS Group's operational sites (100%, 3 out of 3 sites) have mitigation actions and initiated remediation processes in areas where risks were found.

2-4 Assessing inherent risks, analysing and identifying mitigation measures/ actions, and assessing residual risks:

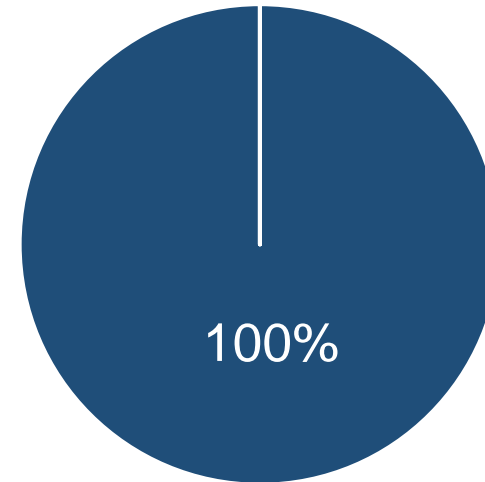
Results of Human Rights Risk Assessment: Overview results (contractors and suppliers)

BTS Group's suppliers identified with high ESG risks



- BTS Group's suppliers identified with high ESG risks
- BTS Group's suppliers without high ESG risks

BTS Group's high ESG risk suppliers identified with high human right risks



100%
of suppliers
assessed

Thus, 100% of our significant Tier 1 suppliers assessed (42), 18.42% of suppliers (7) were identified with high ESG risks.

0 out of 7 suppliers with high ESG risks have been identified having human rights risks



Human Rights Issue:
Occupational Health and Safety

Risks:
Impact to employees occupational health and safety e.g. accident during maintenance or inspection which leads to serious injuries.



Rightsholder and Vulnerable Group at Risk (covered in assessment process):
Employee (including men, women, pregnant women, LGBTQI+, migrant people/workers and people with mobility impairment)



Operational Site:
1.1 Bangkok Mass Transit System PCL

	1.1		

Likelihood

Existing and Additional Mitigation Measure for preventing/remedying/ risks of human rights violations towards employees' rights consist of:

- (1) Establishing safety and security policies and human rights policy.
- (2) Emphasising that every process must be carried out with safety in mind, incorporating safety procedures into each specific task, starting from:
 - * Pre-Construction Period:
 - = Assessment of safety risks in work procedures and their impact on environment and stakeholders.
 - = Ensure that all aspects of the system meet or exceed safety regulations and standards, engineering standards, and international safety standards.
 - = Design and set specifications to ensure that train, signaling system, and all infrastructure systems supporting the mass transit operations meet or exceed international standards and best practice.
 - = Conduct trial runs and simulations on all applicable systems prior to deployment to confirm system readiness before operating service.
 - = Security certification by an independent evaluator (ICE) who will certify the test results of various systems and conducting simulations test prior to deployment to confirm system readiness before operating service to ensure safety according to specified standards.
 - * Operational Period:
 - = Carrying out operating procedures compliance with safety standard and management guidelines.
 - = Safety training for contractors, sub-contractors, suppliers, or other stakeholders who must work or visit in areas of the BTS system.
 - = Having process for controlling service and maintenance operations according to procedures and training that complying with safety standards.
 - = Having periodic risk assessments during operations. Should an accident occur, a thorough investigation must be carried out to identify the causes and risk factors, as well as mitigation measures such as additional safety procedures or safeguard equipment.
 - = Establishing a plan for corrective maintenance and preventive maintenance of equipment and systems.
 - = Preparing and implementing plans to deal with unusual/emergency events and conducting regular drills and training so that employees understand and are able to manage incidents appropriately.
 - = Ensuring that safety monitoring and auditing are in place.
- (3) Implementing an occupational health and safety management system that is certified to ISO 45001:2018, and the railway safety management system (Safety Management System - Best Practice Model: SMS-BPM).
- (4) Focusing on engaging and promoting a safety culture among employees and contractors through training and various activities to encourage employees and stakeholders to actively contribute to safety in operation.
- (5) Conducting Health Risk Assessments (HRAs) to support the development of medical checkup programs.
- (6) Monitoring the Total Recordable Occupational Illness Rate (TROIR) of our employees with the aim of preventing occupational illnesses and tracking our performance on occupational health.
- (7) For high-risk employee groups (including train controller, with a focus on health parameters such as weight, blood sugar level, etc.), if they do not meet certain standards, their performance may have an impact on safety operations.
- (8) Supporting and encouraging safety awareness in its organisational culture, covering passengers, employees and contractors, through safety training and communication channels to ensure all stakeholders be aware of safety during using the BTS SkyTrain.
- (9) Establishing communication channels and participation opportunities for employees at various levels, such as Occupational Safety and Health Committee, Safety Steering Committee, focuses on operational-level employees and team leaders rather than managerial levels emphasising participation from all members to propose ideas, address safety issues, and present them to the management for consideration through the Safety Management Committee (SMC).
- (10) Promoting compliance with the company's safety and security policies especially promoting consciousness "Safety is everyone's duty" by organising training "Safety Behavior: Behavior Base Safety: BBS for operational staff, including train operators, station masters, and maintenance staff, organising safety week activities for employees, contractors, and the general public to participate and learn about operational safety in the mass transit system.

Relevant human rights based on the principles from International Bill of Rights: Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), and the International Covenant on Economic, Social and Cultural Rights (ICESCR)

- Right to life
- Right to an adequate standard of living
- Right to health
- Right to enjoy just and favourable conditions of work
- Right to work



Human Rights Issue:

Health and Safety

Risks:

Impact to customers health and safety e.g. falling on the train platform, stumbling on the escalator, clamping in the elevator, falling equipment from the platform which can lead from minor to major accident to the affected rightsholders



Rightsholder and Vulnerable Group at Risk (covered in assessment process):

Customers (including men, women, pregnant women, LGBTQI+, people with mobility impairment and indigenous people)



Operational Site:

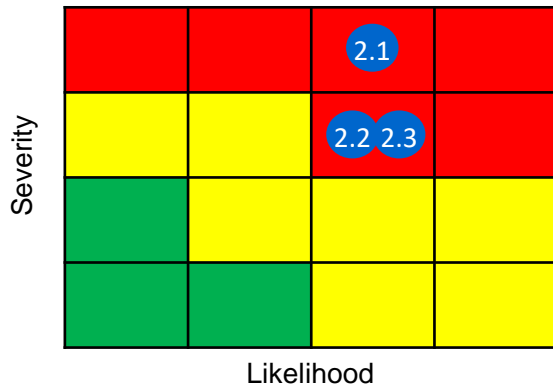
- 2.1 Bangkok Mass Transit System PCL
- 2.2 Northern Bangkok Monorail Co., Ltd.
- 2.3 Eastern Bangkok Monorail Co., Ltd.

Existing and Additional Mitigation Measure for preventing/remedying/ risks of human rights violations towards customers' rights consist of:

- (1) Establishing safety and security policies and human rights policy.
- (2) Conducting risk assessments of various activities that impact passengers, commuters, or other stakeholders to identify comprehensive preventive measures.
- (3) Engaging stakeholders in discussions and workshops to analyse lessons learned from various case studies within the system, seek advice from experts to enhance management practices, and mitigate the recurrence and impact of incidents.
- (4) Installing or upgrading systems or equipment for safety purposes, such as installing platform barriers to prevent accidents on the platform, installing automated external defibrillators (AEDs) at all stations, maintenance centers, and office buildings as life-saving equipment for employees and the public using the transit system.
- (5) Organising safety communication activities through various channels in the system, including brochures, stickers, advertisements on the station's LED monitors at stations, as well as dissemination of information on social media, such as safety week on the station to provide passengers and users of the transit system with knowledge and encourage their participation in building safety awareness while using the transit service correctly.
- (6) Providing safety information to all passengers once they enter the BTS system, such as on the correct use of automatic gates when using escalators, queuing up at platforms and allowing passengers to exit the train first, holding strap or handrail while standing in the train, giving assistance to children, pregnant or elderly passengers. Additionally, this includes highlighting various prohibitions that should not be violated when using the transit service. These prohibitions are assessed based on issues, obstacles, and various complaints received by the company through various channels such as complaint centers or social media platforms.
- (7) Security personnel are stationed throughout various locations across the network to assist passengers in case of illness or emergency situations.
- (8) Providing knowledge on safety and passenger care to employees. This includes basic first aid and initial injury care training conducted by qualified medical instructors, as well as training on operating automated external defibrillators (AEDs) to ensure that station staffs can care for injured or ill individuals promptly and effectively.
- (9) Reinforcing the practice of preventive maintenance, regularly inspection and cleaning of equipment before technicians start their work.

Relevant human rights based on the principles from International Bill of Rights: Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), and the International Covenant on Economic, Social and Cultural Rights (ICESCR)

- Right to life
- Right to an adequate standard of living
- Right to health





Human Rights Issue:

Health and Safety

Risks:

Impact to community members health and safety e.g. equipment falling from the rail or improper of waste disposal management system which can cause minor to major incident to the affected rightsholder.



Rightsholder and Vulnerable Group at Risk (covered in assessment process):

Community members (including women, children, indigenous people, people with mobility impairment, LGBTQI+, pregnant women and elderlies)



Operational Site:

3.1 Northern Bangkok Monorail Co., Ltd.

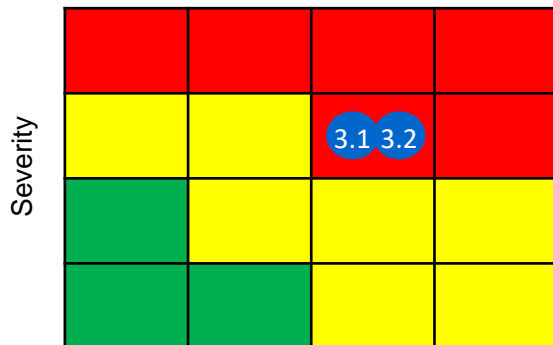
3.2 Eastern Bangkok Monorail Co., Ltd.

Existing and Additional Mitigation Measure for preventing/remedying/ risks of human rights violations towards community members' rights consist of:

- (1) Establishing safety and security policies, human rights policy, stakeholder engagement policy, environmental management policy, in line with ISO 14001:2004 and OHSAS 18001:2007.
- (2) The company conducting activities under: Regulator which includes policy of the Regulator (MRTA) and BTS Group which includes Quality Policy, Occupational Health and Safety Policy, Security Policy, Environmental Policy, Human Rights Policy, Corporate Governance Policy and Code of Business Conduct, Stakeholder Engagement Policy.
- (3) Committing to operate strictly in accordance with the security and safety policy, to provide the highest level of safety for passengers of mass transit system, including community members on road and along the rail routes.
- (4) The Pink Line and Yellow Line rail projects strictly adhere to environmental impact prevention and mitigation measures, as well as continuous monitoring and having assessment protocols, the reports are submitted to the MRTA every 6 months. Environmental impacts are regularly monitored and measured according to the EIA report requirements.
- (5) When the incident occurred, the company has proceeded to officially apologise to all parties involved and handled the incident according to emergency management principles:
 - 5.1) Carry out the incident response plan - officers went out as soon as they knew about the incident to investigate, gather information, and demonstrate the company's accountability to the affected parties.
 - 5.2) Recovery Operation: Inquiry into the incident, offering condolences, showing responsibility to the affected parties, and jointly assessing damaged property.
 - 5.3) Preventive Measures: Seek ways to prevent recurrence of similar incidents.
 - 5.4) Provide Fair Compensation: Compassionate assistance to those affected, such as facilitating incident reporting and requesting necessary documents.
- (6) There are various channels for complaints through the Bangkok Mass Transit System Public Company Limited (BTSC) **Customer Relations Center for the MRT Yellow Line and MRT Pink Line:**
 Phone: Yellow Line:0 2-617-6111, Pink Line:02-617- 6111
 Line Official: @pinkyellowline
 Website: www.ebm.co.th, www.nbm.co.th
 Facebook Page: MRTYellowLine, MRTPinkLine
- (7) Inspect, check, test the readiness of equipment before operation and regular perform preventive maintenance

Relevant human rights based on the principles from International Bill of Rights: Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), and the International Covenant on Economic, Social and Cultural Rights (ICESCR)

- Right to life
- Right to an adequate standard of living
- Right to health
- Rights of minorities





100%
of own
operational
Sites

22 Operational Sites
(including 3 sites out of 22 that have been identified to have human rights risks)

Operate with mitigation measures/ actions to human rights risks

100%
of suppliers

42 Suppliers
Operate with mitigation measures/ actions to human rights risks

64 sites
Operate with mitigation measures/ actions

0
Human rights violation cases reported in FY 2023/24



In accordance with BTS Group's human rights policy, BTS Group has committed to respect all stakeholders and vulnerable groups' human rights, as well as prevent the occurrence of human rights issues and human rights violations that might have directly and indirectly caused by BTS Group's own operation, supply chain and new business relations.

With the aforementioned aspiration, BTS has provided communication channel for stakeholders and vulnerable groups to raise and report human rights issues and violations to BTS Group. The data collected from this channel has enabled BTS Group to monitor BTS Group's human rights performance and conduct stringent human rights issue investigation and human rights due diligence process which are the crucial factors for developing mitigation measures/ actions and remediation actions.

Furthermore, BTS Group has regularly communicated human rights performance, such as human rights initiatives, human rights issues, human rights risks, human rights violations, mitigation measures/ actions and remediation actions, to stakeholders and vulnerable groups via BTS Group Sustainability Report and Human Rights Disclosure.

In addition, the company has launched the "Nuduan Chuan Chee Chong Hotline" campaign, which is an intake system operated by an unaffiliated service provider, as another reporting channel for any breach or a case of possible breach of the policies and guidelines under the Code of Business Conduct.

Communication Channels

Sustainability Department

BTS Group Holdings Public Company Limited
15th floor, TST Tower, 21 Soi Choei Phuang,
Viphavadi-Rangsit Road, Chomphon, Chatuchak, Bangkok 10900
sustainability@btsgroup.co.th
www.btsgroup.co.th

Internal Organisation Channel

Nuduan Email: DoltRight@btsgroup.co.th
Direct Report
Human Resources: Tel: +66 (0) 2273 8611-5
Post: Human Resources at the Company's address

External Organisation Channel (Nuduan Chuan Chee Chong Campaign)

Nuduan (Hotline): Tel. : 1 800 292 777 and +66 (0) 2677 2800

Email: tell@thailand-ethicsline.com
Post: BTSG – EthicsLine at P.O. box 2712 Bangrak Post Office 10500

5 Remediation – 1

BTS Group has implemented the following processes in order to mitigate human rights risks and take remediation actions.



- ✓ Integrate results of human right risks assessment into BTS Group's human rights risk register;
- ✓ Cover and discuss human rights risks in decision-making activities to inform responsible departments about the risks; and
- ✓ Assign responsible departments to develop additional mitigation measures/ actions to further mitigate and reduce human rights risks, reduce the extent of the impacts, especially their likelihood, and develop actions plans for additional mitigation measure/ action implementation.
- ✓ Assign responsible departments to follow up and review human rights risks every 6 months, adjusting the risk register if necessary.



- ✓ Implement the aforementioned actions plans in order to commence additional mitigation measures/ actions by responsible departments;
- ✓ Report about the implemented additional mitigation measures/ actions to stakeholders and vulnerable groups, who are associated and risk facing human rights risks;
- ✓ Monitor and track performances of existing and additional mitigation measures/ actions through provided communication channel by responsible departments;
- ✓ Report the progress, red flags, and actual and potential human rights impacts to BTS Group's Sustainability Department and Sustainability Committee to inform and provide guidance to responsible departments to handle BTS Group's relevant human rights issues; and
- ✓ Initiate the meeting with the aforementioned department and its Director in order to develop remediation actions for human rights impacts.



- ✓ Implement remediation actions to remedy the affected stakeholders and vulnerable groups;
- ✓ Inform the aforementioned department and its Director, and the affected stakeholders and vulnerable groups about remediation actions taken;
- ✓ Monitor and track performances of remediation actions taken;
- ✓ Request feedbacks on remediation actions taken from the affected stakeholders and vulnerable groups;
- ✓ Adjust and further develop remediation actions (if necessary); and
- ✓ Keep taking remediation actions and follow up with the affected stakeholders and vulnerable groups until they return to the state before encountering human rights impacts.

5

Remediation – 2

BTS 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. FY 2023/24, BTS Group has found no cases of human rights violations. Thus, there were not any form of remediation actions taken nor necessary. This was as a result of our rigorous human rights risks mitigations process in place.





Sustainability Department

BTS Group Holdings Public Company Limited

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