BTS Group Salient Human Rights Issues

Activities/ Areas of operation	Salient Human Rights Risk Issues	Related Stakeholders	Additional Measures to mitigate risks
Employees			
Activities in rail transit, non-rail, advertising, logistics, E-payment and joint ventures (covering services business, property development)	Employees working at the platforms and trains can face a number of health and safety risks. Impacts can be as severe as death, accident such as train-to-train collision that lead to severe impacts, or cases where employees fall over platforms.	Employees	 Implement Operations Inspector (OI) from Safety Department Establish emergency plan and conduct the emergency response drill annually Establish training matrix for employee in specific positions that have occupational risk as appropriate Provide training and implement "Access Control System", Work Permit and Authorised Person On Site To Liaise
Activities in rail transit, non-rail, advertising, logistics, E-payment and joint ventures (covering services business, property development)	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 do not exceed the job description	Employees	 Implement Employee Engagement Survey to measure employees' satisfaction and engagement for further improving benefits and well-beings Allows employees to choose the rate for provident fund for the employee contribution part within the company's designated rate range Have annual medical check-up programs for employees who require to examine and allow employees' family member to pay

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			 the same as corporate's rate of the programme Has OT e-form or online form that it is accessible by employees but authorised approval is needed
Activities in rail transit, non-rail, advertising, logistics, E-payment and joint ventures (covering services business, property development)	Gender discrimination can lead to unfair hiring practices, pay disparities, workplace harassment, and favourable treatment for majority groups in promotion and professional development	Employees	Establish HR Registration Doc. No.25640001 regarding to Human Rights-HR Commitment which is about BTSG HR guideline to manage HR according to the human rights principle
Activities in rail transit, non-rail, advertising, logistics, E-payment and joint ventures (covering services business, property development)	Employees should have access to join trade unions and bargain for their rights. Additionally, while lack of trade unions may not directly create impacts on employees' health and safety, or irremediable impacts, it will affect all employees, as their freedom to join trade unions has not been granted	Employees	HR framework (apart from Code of Conduct, BTSG HR Policy and framework have been set up for concretely implementing on various issues, namely, Human rights; Diversity & Inclusion; as well as health and well-beings including with workplace culture, discrimination protection, reviewing and measurement are mentioned
Activities in rail transit, non-rail, advertising, logistics, E-payment and joint ventures (covering services business, property development)	Variety of employees could be hired to work in diverse business activities. Without systematic investigation and monitoring measures, some employees might be forced to work or become compulsory labours by, for instance, confiscating identity documents, whereas migrant workers could be illegally hired in	Employees	 Employee Engagement Survey to measure employees' satisfaction and engagement for further improving benefits and wellbeings Working with a third party or partnership with organisations to identify risks of child labour and

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	specific business activities. Moreover, there is a high possibility that children could be hired or requested by their parents to provide a small assistance at the parents' workplace. Apart from that, business activities could be involved in human trafficking case when employees are sought and recruited by third-party recruiters. These circumstances undoubtedly violate human rights of employees, who are considered as the victim		forced labour to develop action plan, monitoring and remediation system • Adopting and conforming with "The Employer Pays Principle" that indicates the company's responsibility to pay employment related fees, which could reduce the power of middle man
Activities in rail transit, non-rail, advertising, logistics, E-payment and joint ventures (covering services business, property development)	Employees may be involved in bribery and corruption, which could directly or indirectly violate human rights of particular group of stakeholders or vulnerable groups. For example, employee working for finance-related department or position may corrupt allowance of subcontractors by paying the lower amount than he/she is given and ordered to pay subcontractors. This undoubtedly violates subcontractors' human rights.	Employees	 Allows employees to choose the rate for provident fund for the employee contribution part within the company's designated rate range Take strict actions under existing measures and penalty, compliance with the anti-corruption policy, and putting in place a monitoring system for suspicious actions (e.g. monitor and examine transaction records) Frequent communication with employees about the Code of Conduct and Anti-Corruption Policy with a focus on their understanding, acknowledgment and strict compliance

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			 Recurring training provided (e-self learning) on Code of Conduct and Anti-Corruption policy
Supply Chain/ Contractors			
Activities in rail transit, non-rail, advertising, logistics, E-payment and joint ventures	Business activities could have risk violating employees' human rights. e.g. low payment, long working hours, shortage of various benefits	Supply Chain/ Contractors	 Has OT e-form or online form that it is accessible by employees but authorised approval is needed
Procurement activities in rail transit, non-rail, advertising, logistics, E-payment and joint ventures	Procurement may pose risks of human rights violation e.g. the responsible person for procurement process might implement 'sole source' approach for selecting suppliers and/or contractors, which cause certain suppliers - those whom are not selected - feel discriminated.	Supply Chain/ Contractors	 The Company is developing measures to mitigate this salient human rights risk issues. Take strict actions (i.e. penalty implementation) to ensure that approach for selecting suppliers and/or contractors comply with the company's procurement process or required standards.
The business activities in rail transit and non-rail.	Construction activities could lead to human rights violation of suppliers/ contractors if they are not well managed and monitored. Employees of suppliers/contractors might be injured and/or died because of operations of business activities.	Supply Chain/ Contractors	 The Company is developing measures to mitigate this salient human rights risk issue. Frequently examine occupational health, safety and environmental standards of suppliers/contractor (e.g. standard/ quality of personal protective equipment (PPE)). Conduct audit and regular visits to suppliers/contractors operating sites to ensure adequate workplace well-being.

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Customers			
Activities in rail transit, non-rail, advertising, logistics	Customers are exposed to a variety of health and safety risks on BTS train systems, ranging from minor accidents to fatality.	Customers	 Implement Operations Inspector (OI) from Safety Department Establish emergency plan and conduct the emergency response drill annually Establish training matrix for employee in specific positions that have occupational risk as appropriate Provide training and implement "Access Control System", Work Permit and Authorised Person On Site To Liaise Certify the Safety Management System (SMS) and Occupational Health and Safety Management system (ISO45001:2018) Hazard Identification, Risk Analysis and Opportunity from Operation safety and Occupational Health and Safety
Communities and Environment			
Construction and operation activities for rail transit, non-rail, advertising, logistics, E-payment and joint ventures	Business activities may be violating the surrounding communities' human rights if the activities that are conducted at local levels risk affecting local communities' health and safety. Also, shipping activity	Community	 Implement Operations Inspector (OI) from Safety Department Establish emergency plan and Conduct the emergency response drill annually

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	may lead to accidents in which local communities' health and safety are affected.		 Establish training matrix for employee in specific positions that have occupational risk as appropriate
			 Provide training and implement "Access Control System", Work Permit and Authorised Person on site to liaise
			 Certify the Safety Management System (SMS) and Occupational Health and Safety Management system (ISO45001:2018)
			 Hazard Identification, Risk Analysis and Opportunity from Operation safety and Occupational Health and Safety