

Standard Operating Procedure of Human Rights Due Diligence

By Sustainability and Risk Management Division

Revision: Year 2024

Scope

To ensure that Berli Jucker Public Company limited and its subsidiaries (BJC Group)'s operations do not result in human rights breaches throughout the value chain. As a consequence, a comprehensive Human Rights Due Diligence (HRDD) has been developed. It applies to all BJC Group employees and will be effective from now onwards until the new or updated procedure will be applied further.

Overview

Operating business inevitably involves with "people" (from the company's employees, partners' employees, community members to remote communities relating to the company operation) directly and indirectly. Thus, taking responsibilityfor human rights is the company's priority; human rights not only is all about "rights" but also includes treating other human beings with respect and dignity. Consequently, the company should establish a framework for business operation according to the principle of human rights including supply chain. In this article willmention employees, partners and customers.

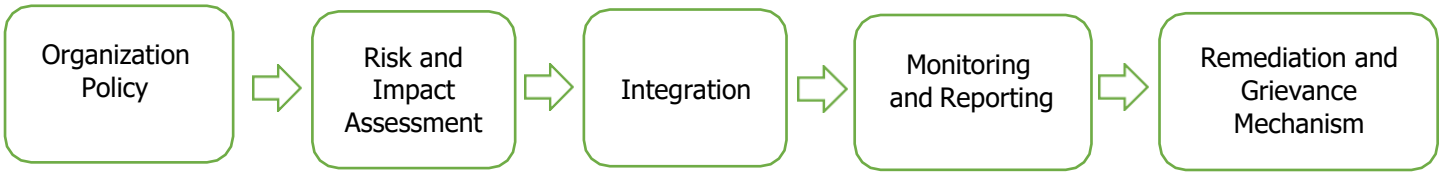
At present, Berli Jucker Public Company Limited and the Group Company have implemented the Sustainable Development Project, and have become one of the companies participating in the Down Jones Sustainability Index (DJSI) assessment. DJSI emphasizes that the participating companies should have implemented and clear guidelines to tackle human rights violations, including arranging Human Rights Due Diligence Process (the process of throughout human right assessment) in order to ensure that the business operation of the company will not infringe human rights throughout the value chain. Therefore, the company has established Human Rights Due Diligence Process guidelines including prevention and resilience guidelines to remediate the impacts of human rights violation, and has arranged a plan to monitor the result of prevention and resilience operation to be more effective.

The guideline has been developed by studying from the DJSI assessment criteria under "Human rights - Due Diligence Process" section as well as study from the operation of counterparts, peers and other best practice companies. Furthermore, this guideline is in accordance with the Code of Business Conduct and Human Rights Policy and UN Guiding Principles for Business and Human rights (UNGP) for "Prevention, Respect and Remedy"

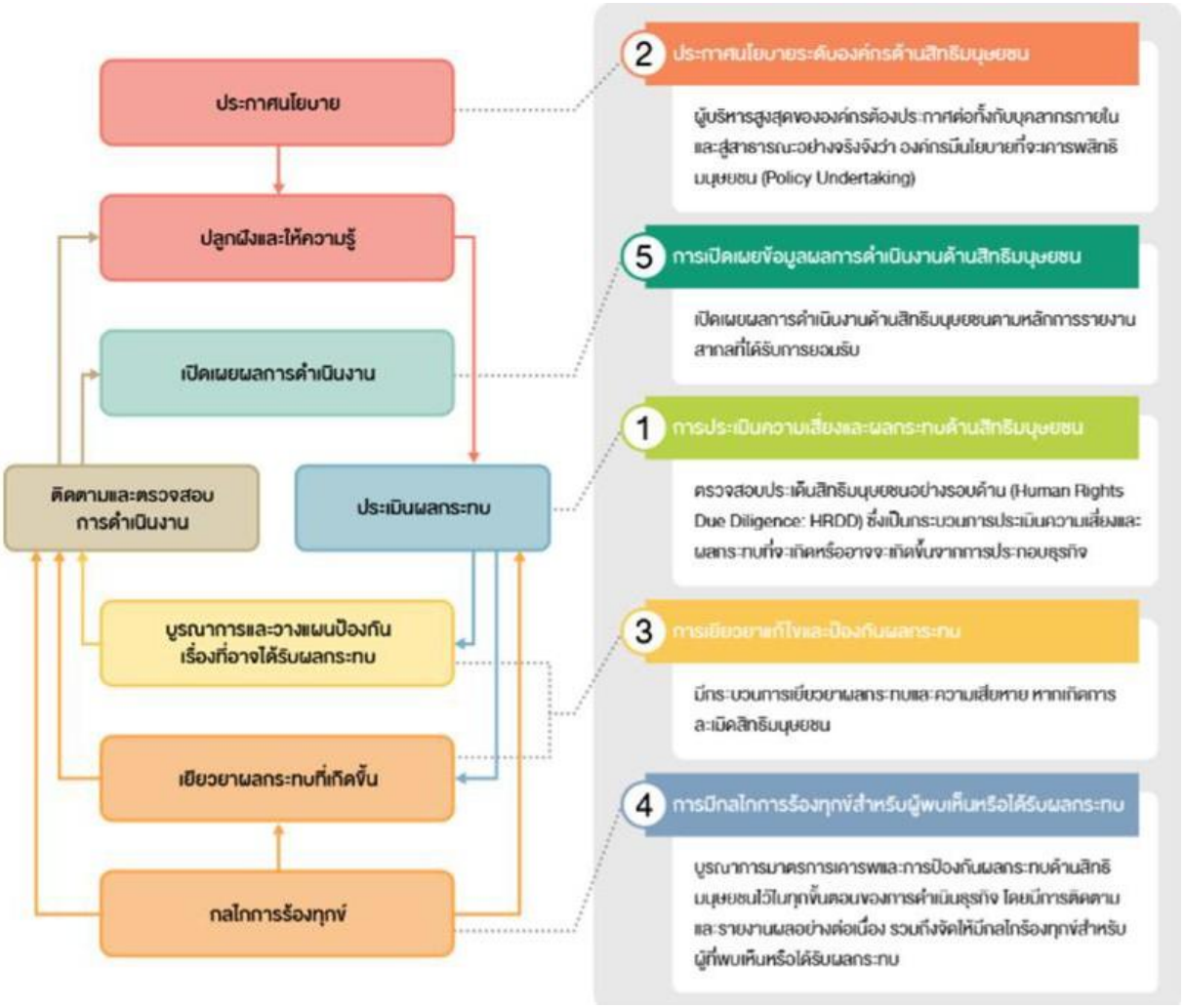
Human Rights Due Diligence Process

The Requirement of the BJC Human Rights Due Diligence process (in accordance with the UN Guiding Principles for Business and Human rights: UNGP) has 5 steps as follows:

1. Integrate the principle of human rights into the new policy and currently existing policy
2. Assess the risk and impact on human rights
3. Integrate and implement
4. Monitor the responses and communicate the impacts are resolved
5. Remediate and accept complaints



Human rights framework based on the UN Guiding Principles for Business and Human rights (UNGP)Human rights risk and impact assessment.



1) Identification of relevant human rights issues

BJC Group adopt the Universal Declaration of Fundamental Human Rights. In performing a Human Rights Due Diligence (Human Rights Risk Assessment), the Company considers the risks that may be involved and/or arise from the Company's operations. The scope of identifying stakeholder groups affected by business activities will be covered employees, children, women, indigenous people, migrant workers, contractors/service providers, and communities, etc. which will be classified into five major groupings as follows:

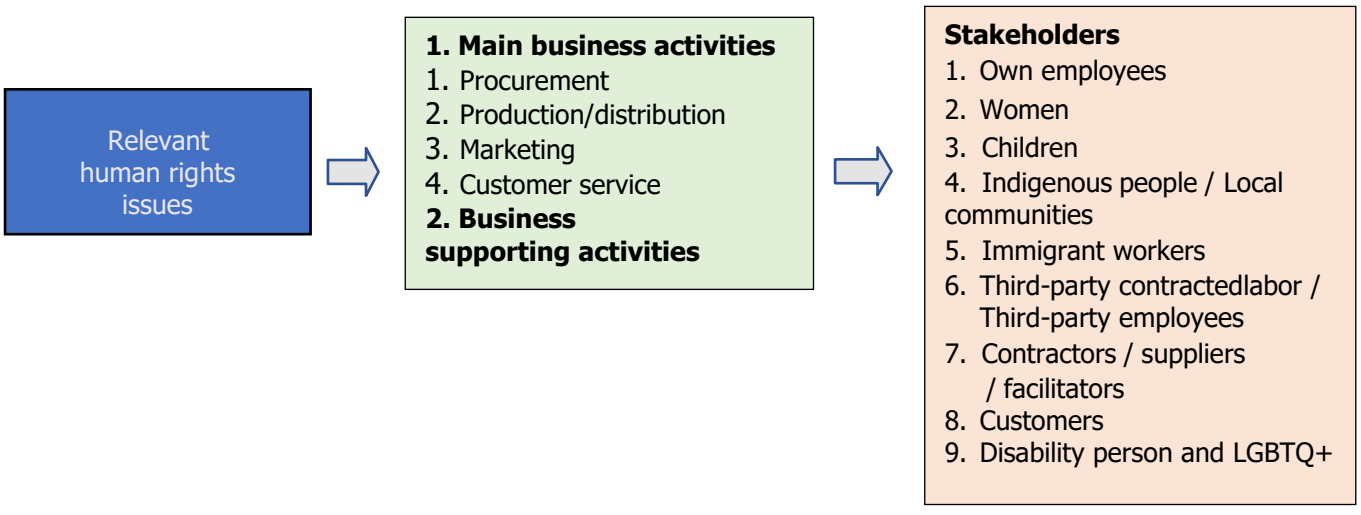
1. Community participation
2. Employee
3. Migrant workers
4. Contractor/ Service provider
5. Customer

Scoping relevant human rights issues

Identification stakeholder groups affected by business activities by considering stakeholders from both inside and outside organization affected by BJC's business activities.

1. Own Operation
2. Value Chain and related to BJC's group business
3. New Business relation (Mergers, Acquisitions, JV etc.)
4. Other

BJC's business activities have procurement, production, distribution, marketing, customer service and business supporting activities.



The following are human rights issues which should be identify and consideration

Risk scope	Labor rights	Participation and ethnics of suppliers	Consumer rights	Community rights
Relevant human rights issues	Compliance with labor laws (workhours, remuneration,etc.)	Employee hygiene and safety	Customer hygiene andsafety	Community hygiene andsafety
	Employee hygiene and safety	Child labor	Discriminationto customer	Quality of community life
	Child labor	Equality, Discrimination and Harassment	Personal information security	The use of natural resources in the local
	Equality, Discrimination and Harassment	Safety of employees of suppliers		
	Equal remuneration	Human trafficking		
	Freedom to join labor union (Freedom of association)			
	Collective bargain power (Right to collective bargaining)			
	Forced labor and migrant workers			
	Human trafficking			

Human Rights Issues definition

Labor rights

- Violations of labor rights such as no employment contract; employment doesnot comply with labor laws standards; obstruction of trade unions, and women is expected to be hired lower than men or terminated when women are pregnant
- Safety work such as too consecutive working hours
- Discrimination against employees regarding to racial bias, gender, religion, orage

Environment and Natural Resources Rights

- Business operation which uses resources and violates community rights to access resources which have an impact on their lives such as the use of high-power pumps cause shortage of clean water in communities
- Improper waste management by discharging waste water to public sources causing the community to suffer and get sick
- Construction that blocks the flow of water causing flooding.

Rights to residency and occupation

- Encroaching and violating arable lands, the ritual areas, and the localcommunity cemeteries.
- Culture conflicts

Service Users Rights

- Discrimination regarding to gender, bias, race, and religion such as discrimination against customers of color or denying service to people with HIV.
- Violation of customer privacy such as personal information being leaked.

2) Risk and impact assessment

Supplier (Outsource & Tier1 suppliers)

- Assessed by Group Procurement Department and Merchandise together with Supplier Risk Assessment process

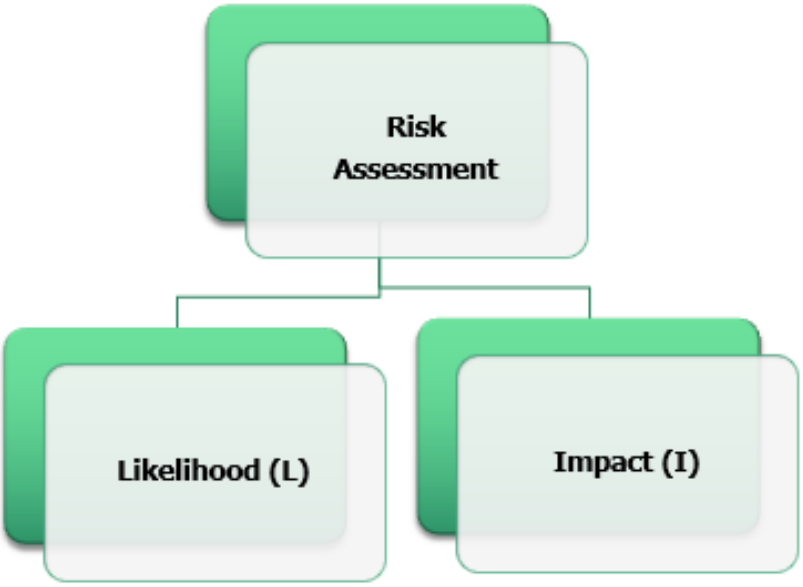
Own Operation

- Individually assessed by business group
- Section relating to employees assessed by Human Resource (HR)
- Customer and community assessed by the relevant departments

Joint Ventures

- Self-assessment for JV companies

The Human Rights Risk Assessment Criteria is based on two factors: Likelihood and Impact.



Impact

level		*Criteria*
1	Low	A. The potential impact of human rights concerns raised by stakeholders either from inside or outside has been prevented and resolved at the operational level and by the company's complaint management mechanism. B. Does not affect the health and safety of workers and / or Stakeholders (First Aid) C. Does not affect the relevant stakeholders D. Can remediate the relevant stakeholders in short time (<1 year)
2	Medium	A. The company cannot respond to human rights concerns from internal or external stakeholders. B. Causing minor injuries, requiring medical attention (Still can come to work) C. Affecting some of the relevant stakeholders D. Able to remediate the relevant stakeholders in a period of 1-3 years
3	High	A. Human rights impacts resulting from the company's operations or the company's value chain, affecting the stakeholders in the operational areas B. Affecting health and safety to the stage of absence C. The company has a human rights conflict with risk groups or groups that require special care (Vulnerable Group) D. Able to remediate all relevant stakeholders in a period of 3-5 years
4	Vary High	A. Human nights impacts have a broader impact or affect all relevant stakeholders in the group (such as the entire community, all employees and all partners) B. Severely affecting health and life-threatening C. Human rights-relating incidents require the assistance of independent external agencies which are reliable in order to mediate problems with the company D. The company cannot control, remediate, or mitigate human rights effects in order to restore those rights violated and/or takes a long time to remediate (more than 5 years)

Likelihood

Level	Criteria for assessing the probability of occurrences
1	✓ The company has throughout control or protection. There is very little chance of problems ➢ Have small chance to occur within a year or less than 5% ➢ In the past, almost no events occurred / may not occur again
2	✓ The company has some control or protection but there is still a chance of a problem will occur ➢ Have a 5-10% chance of occurring within a year ➢ There are occasional occurrences
3	The company has no control or protection at all or very few, but never had a problem ➢ Have a 10-20% chance of occurring within a year ➢ There are chances of occurring many times
4	✓Used to have a problem or have a complaint or very likely to cause problems ➢ Have more than 20% chance of occurring within a year ➢ Very likely to occur

Risk rating

Impact / Likelihood	Low	Medium	High	very high
very high	M	H	VH	VH
High	L	M	H	VH
Medium	L	M	M	H
Low	L	L	L	M

Risk Level	Low	Medium	High	Very High
%	0-24	25-49	50-74	75-100
Definitions	No risk or very low risk Acceptable risk	Risk but not significant Acceptable risk	Significant risk Higher than acceptable risk Risk management plan should be prepared within an appropriate period	Very significant risk Higher than acceptable risk Risk management plan should be prepared immediately

Once the risk has been assessed and found that the risk is high and very high, the appraiser must plan to manage the risk as follows:

- **Very high risk:** must prepare a risk management plan immediately or have a short-term plan to manage that risk.
- **High risk:** Must prepare a risk management plan within the year or have medium- and long-term plans to manage that risk.

3) Integration and Action

Prepare guidelines for the prevention and resolution of human rights in the businessoperations of the company to ensure that the human rights management of the company is effectively controlling and reducing impacts throughout the value chain.

Risk Responses

- Accept: Identify the risk as acceptable and let it happen
- Reduce: Specific actions taken to reduce likelihood or impact or both
- Transfer: Have someone else handle the risk i.e. insurance
- Avoid: Not participate in events that give rise to risk.

Control Activities

- Preventive Controls
- Detective Controls
- Corrective Controls

4) Monitoring and Reporting

There is an annual monitoring and reporting performance of Human RightsDue Diligence, and disclosure information through various channels such as the annual sustainability report or company website, etc. In addition, the company must provide communication channels to receive opinions and suggestions from employees and third parties in order to revise. Consequently, the company can prevent and reduce risks that may lead to human rights violations.

5) Remediation and grievance mechanism

The company has to provide measures to remediate those who may be affected by human rights violation. Both in the form of monetary help and which is not monetary to alleviate the suffering for those affected by human rights violation from the company's business operations by considering the impact levels that occur on a case-by-case.

Review and Improvement

Human rights impact and risk assessment will be review annually to ensure the effectiveness of internal control and risk management process of the company's operations, joint ventures and suppliers. Potential risks and mitigation plans will be communicated to internal stakeholders, including the board of directors and employees, as well as external stakeholders such as shareholders and customers to promote awareness of human rights protection.