

HUMAN RIGHTS DUE DILIGENCE

SUMMARY REPORT 2024

TISCO Financial Group Public Company Limited

Our Human Rights Guidelines has adopted United Nations Guiding Principles on Business and Human Rights (UNGPR) to guide the organizational management and practices.

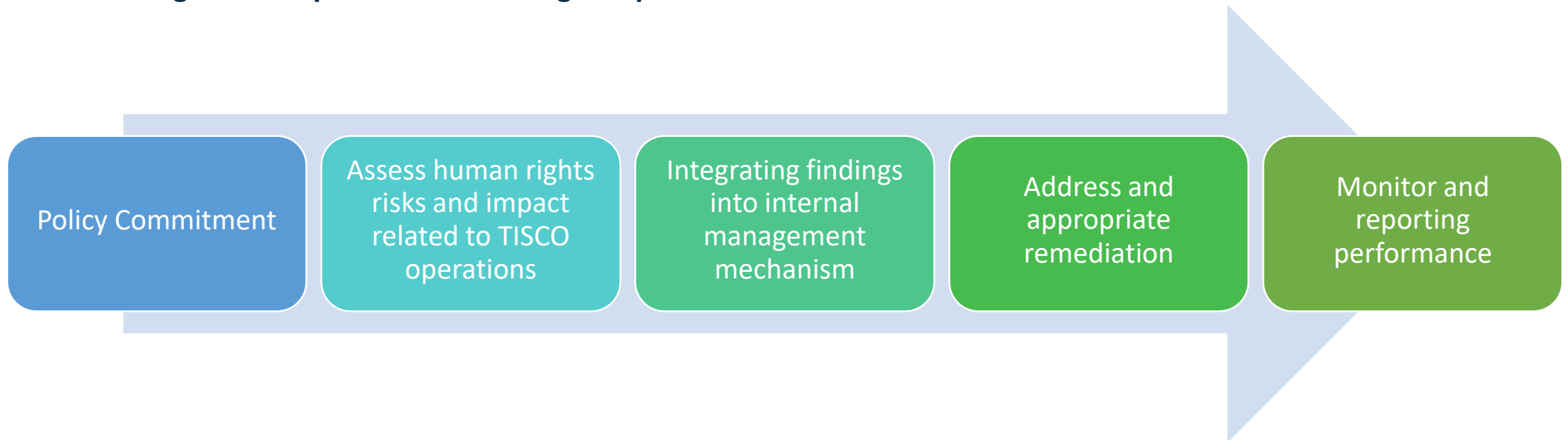
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1. Human Rights Due Diligence Overview

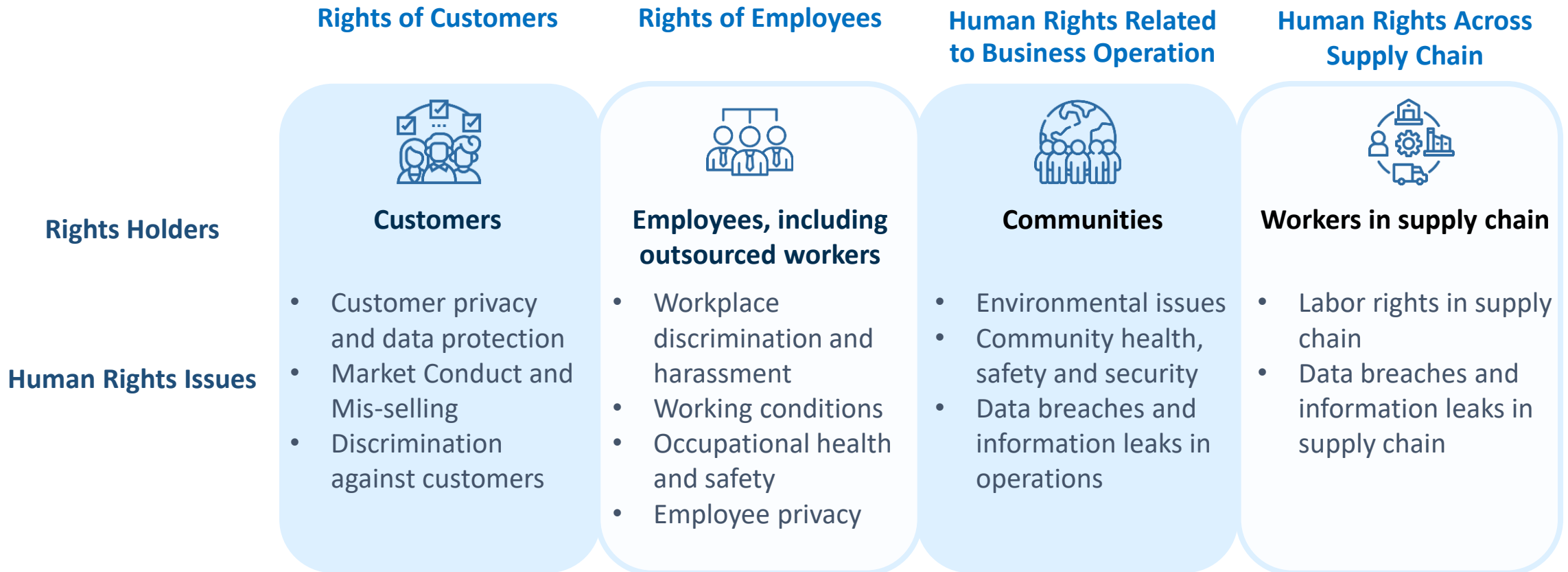
Human rights due diligence has been developed in accordance with the UN Guiding Principles on Business and Human Rights (UNGPR). TISCO group undertakes the human rights due diligence process to identify, prevent and mitigate adverse human rights impacts as a result of its activities throughout our value chain. Human rights guidelines apply to all subsidiaries of TISCO Group associated activities within the value chain, and relevant stakeholders such as customers, employees and suppliers.

The due diligence comprises the following components:



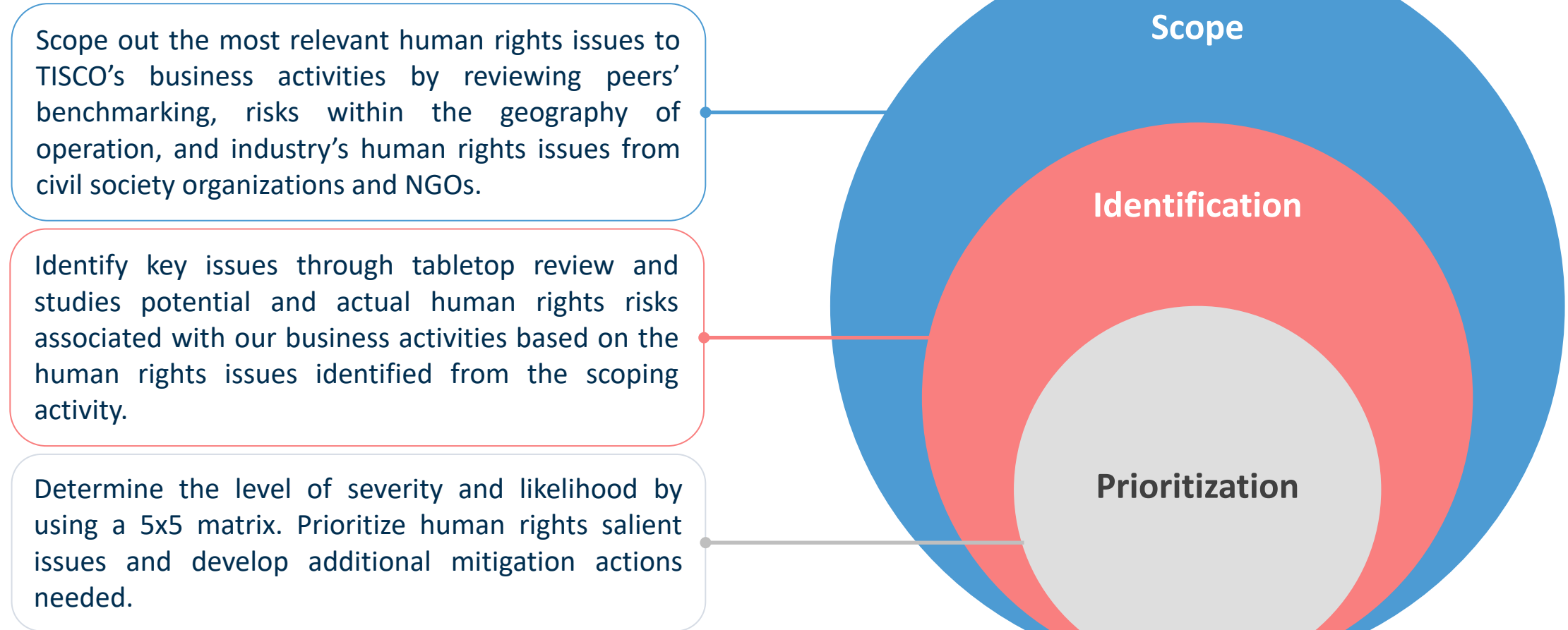
2. Policy Commitment

TISCO Group upholds sound corporate governance, social and environmental development, and ISO 26000 Social Responsibility Guidelines. The company ensures the protection of human rights for all stakeholders and has established business guidelines to support sustainable development. Human rights management process encompasses 4 key areas:



3. Human Rights Risk Assessment – Framework

Methodology to assess our human rights risk and impacts as follows:



3. Human Rights Risk Assessment – Framework

Human Rights Risk Assessment Criteria: Severity

Level of Severity	Scale of impact to Rights Holder		Scope of effects (How many people are or will be affected)
	Health and Safety	Right to privacy	
Extreme (5)	Severe impact to health and safety: physical disability or fatality	Result in exposure of highly sensitive information, such as financial data or personal health information, on a large scale	Impact to all stakeholders in several stakeholder groups
High (4)	Significant impact to health and safety: serious injury that needs prolonged rehabilitation (> 30 days)	Result in Exposure of sensitive information that result in significant harm to the company and its customers	Impact to most stakeholders in several stakeholder groups
Medium (3)	Moderate impact to health and safety: serious injury that needs rehabilitation (< 30 days)	Could result in a limited release of personal sensitive information and may cause some harm to the company and its customers, but the impact is typically limited	Impact to most stakeholders in a particular stakeholder group
Low (2)	Slight impact to health and safety: minor injury or illness	Able to be resolved by the current operational level grievance mechanism	Impact to some stakeholders in a particular stakeholder group
Minimal (1)	Minor impact to health and safety: first aid case	Minimal or no impact to subject of rights	No negative impact to stakeholders

Note: Severity is not an absolute value, but is relative to the other human rights risks and impacts that have been identified (UN Guiding Principle 14).

3. Human Rights Risk Assessment – Framework

Human Rights Risk Assessment Criteria: Severity

Level of Severity	Scale of impact to TISCO		Irremediable Nature (Difficulty to remediate the impact)
	Reputation	Laws and regulations	
Extreme (5)	Serious complaints made through the public and has a strong impact on the nation-wide level	Violations of laws/regulations that lead to significant legal action and fines, prosecutions, and/or interference by the authorities	Impossible to restore or will take more than 5 years to restore the impact
High (4)	The nation-wide spread of negative news, including through social media, with a serious impact on the organization	Violations of laws/regulations leading to legal action that result in fines or penalties	Take 3-5 years to restore the impact
Medium (3)	The spread of negative news is limited to a specific area and the issue can be resolved within a short period of time	Violations of laws/regulations leading to legal inquiries from relevant authorities. However, the damage will be limited to being further questioned or requiring a written statement	Take 1-3 years to restore the impact
Low (2)	Complaints arising from misconduct, can be resolved and have very little impact	Violations of laws/regulations that may affect company’s relations with official authorities but not for a long period of time and no fine or penalty	Take less than a year to restore the impact
Minimal (1)	Complaints arising from service dissatisfaction that can be resolved without repercussions	Violations of laws/regulations that have no legal impact or penalty	Take several months (<6 months) to restore the impact

Note: Severity is not an absolute value, but is relative to the other human rights risks and impacts that have been identified (UN Guiding Principle 14).

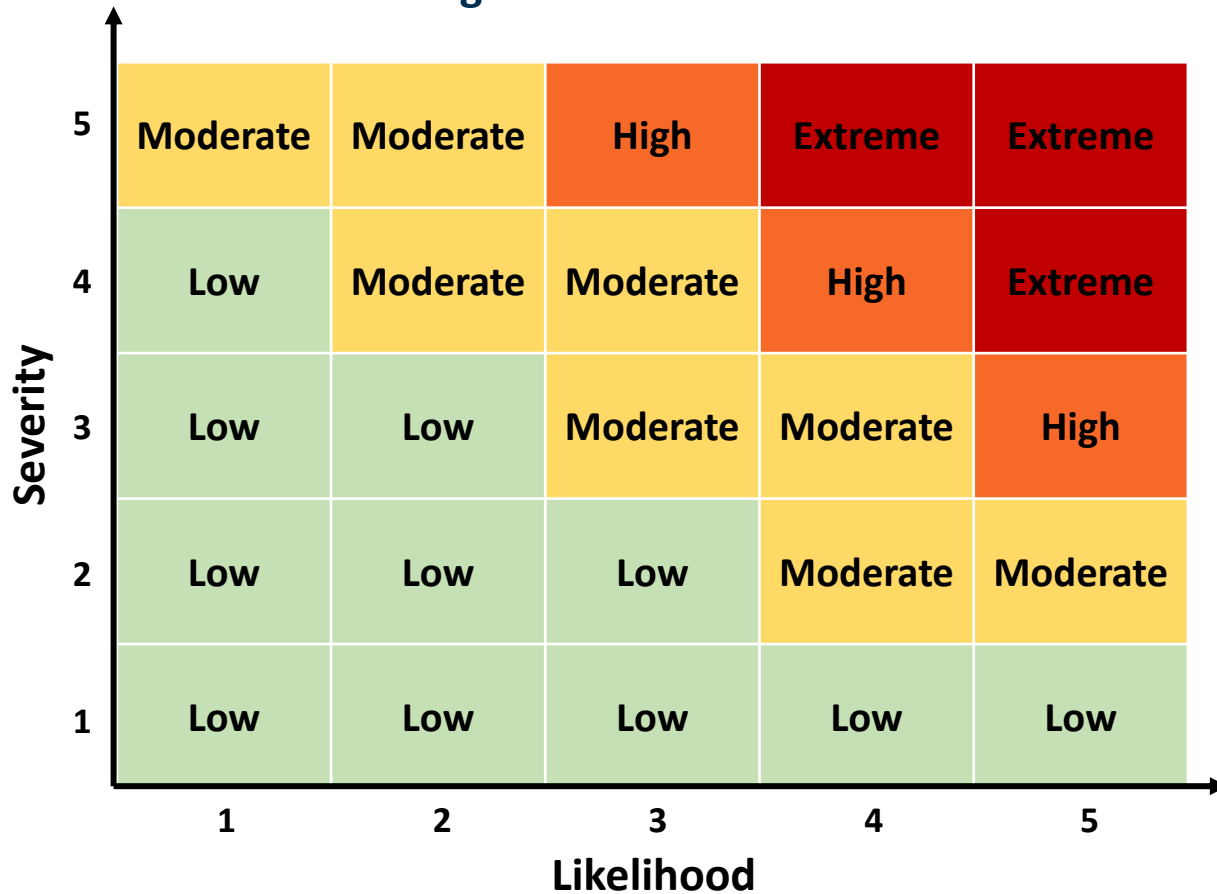
3. Human Rights Risk Assessment – Framework

Human Rights Risk Assessment Criteria: Likelihood

Likelihood Level	Likelihood	Example
Highly likely (5)	Commonly occurred in most circumstance	Such human rights issues have occurred consistently from the past until present.
Likely (4)	Probably occurred in most circumstance	Such human rights issues have happened in the past and also occurred very often at the present.
Possible (3)	Might be occurred at some points	Such human rights issues have happened in the past and might occur at the present depending on nature of business units' operations.
Unlikely (2)	Small chance of occurring or in the far future	Such human rights issue have never occurred in our business operation but have occurred in the industry of the operation.
Rare (1)	Unlikely to occur	Such human rights issue have never occurred in our business operation and rarely occurred in the industry of the operation.

3. Human Rights Risk Assessment – Framework

Human Rights Risk Assessment Matrix



Risk level:

High and Extreme risks are salient human rights risks that need to be addressed with additional prevention/mitigation measures.

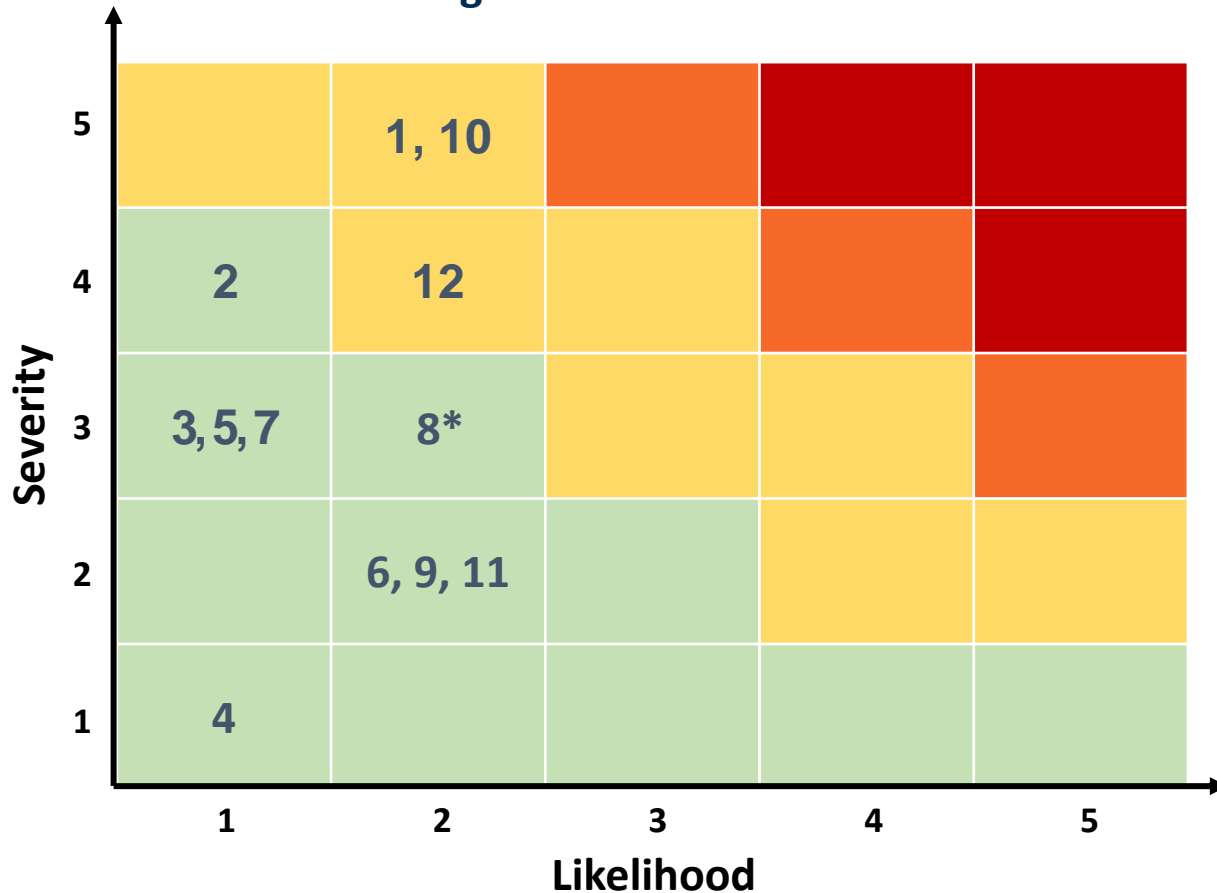
Moderate risks are human rights risks that are mitigated to some extent but need additional mitigation measures.

Low risks are human rights risks that are appropriately mitigated and should be monitored regularly for changes.

3. Human Rights Risk Assessment – Result

TISCO identified 12 human rights issues related to its operations and throughout our value chain, where there were **NO salient human right issues** that were ranked at high and extreme level.

Human Rights Risk Assessment Matrix



Customer practices

1. Customer privacy and data protection
2. Market Conduct and Mis-selling
3. Discrimination against customers

Labor practices

4. Workplace discrimination and harassment
5. Working conditions
6. Occupational health and safety
7. Employee privacy

Business practices

8. Environmental issues*
9. Community health, safety and security
10. Data breaches and information leaks in operations

Supply chain practices

11. Labor rights in supply chain
12. Data breaches and information leaks in supply chain

*Environmental issues are getting more attention in the financial sector and could be more salient in the near future.

4. Integration into Internal Management: Risk Mitigation



1. Customer privacy and data protection

10. Data breaches and information leaks in operations

12. Data breaches and information leaks in supply chain

8. Environmental issues

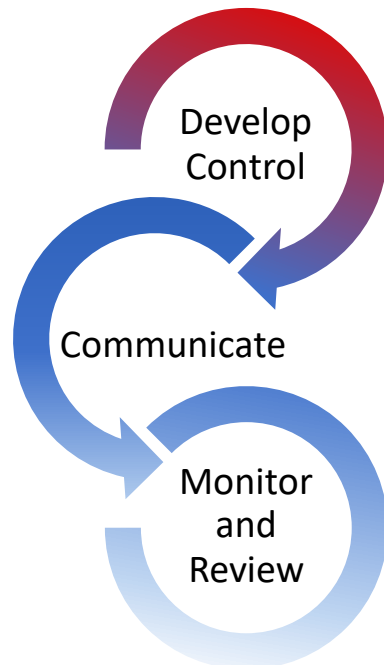
4. Integration into Internal Management: Risk Mitigation

1. Customer Privacy and Data Protection, 10./12. Data and Information Leaks and Breaches in operations and supply chain

Rights Holder Impacted: Our customers and supply chain practices

Description: Collection, use, and disclosure of customer information without proper basis and market practice which may lead to privacy issues. This also includes data leakage and breaches due to insufficient security systems and implementation.

Mitigation Actions:



Control Mechanisms

Data Governance:

- Data Governance
- Personal Data Protection
- Data Breach Response Plan Guidelines
- Data Classification and Data Control

Business Practice:

- Human Rights
- Market Conduct
- Business Partner
- Incident and Complaint Management

Information Technology:

- Information Security
- IT Risk Management
- IT Acceptable Use
- Access Management and Audit Log
- Incident Response Playbook

Communicate

Own Operation

- Compulsory Learning modules on
 - Data Governance
 - Data Classification
 - Security Awareness
 - Personal Data Protection Act (PDPA)

Supply Chain

- Business Partner Evaluation and Risk Assessment
- Supplier Code of Conduct
- Supplier Site Visit

Monitor and Review

- Regular IT Audits and Compliance Checks
- Annual Cyber Drills
- Performance and risks management outcomes quarterly summarized and reported to Data Governance Committee

8. Environmental issues

Human rights related to environmental issues are becoming more prominent, especially in power plant sector. Thus, although these risks are currently considered low, TISCO is taking precautionary measures to address these potential issues.

Rights Holder Impacted:
Communities and Society

Description:
Project Financing to power plants could affect human rights of the surrounding communities in terms of the right to well-being and access to natural resources, as well as indirect impacts that result in natural disasters in the area.

Mitigation Actions:

- ESR (Environmental and Social Risk) Assessment covers the potential impact on the communities in which the project is located. Both during the construction period and after the construction project is completed.
- ESR Highly Sensitive Sector List is referred to in the screening process before making financial decisions
- While the project is underway. In case of complaints from affected parties related to approved loans, Lenders must clarify details and/or guidelines for handling complaints arising to the Bank in order to consider and approve or satisfy the measures to handle such problems.
- On process to improve environmental impact management according to industry standard such as BOT's Policy Statement on Internalizing Environmental and Climate Change Aspects into Financial Institution Business and Task Force on Climate-related Financial Disclosures (TCFD).

5. Remediation Process

In case of human rights violation concern raised, the process includes:

Report through HR Helpline or Complaint Channels

Consult with management and related parties on the approach for remedying affected persons when human rights adverse impacts occur and affect persons

Immediately initiate remediation actions after the approach was approved and notify remediation taken to affected persons

Summary report to related management and related regulators (as required)

Regularly monitor and communicate with affected persons until they return to the previous state before being affected by human rights adverse impact

Review and update risk register to prevent such risk in the future

6. Performance Report and Monitoring

TISCO reviews human rights due diligence annually. Results from the human rights due diligence are utilized for more effective prevention, whereas performance are communicated to internal and external stakeholders.

In 2023, with the implementation of mitigation measures, there were **no case of human rights violations**. Thus, there were no remediation actions necessary and taken.

TISCO provides communication channel for both internal and external stakeholders and vulnerable groups to report human rights violations or make complaints.

Further details about [whistleblowing](#), [complaint and suggestion channels](#)

In case of unexpected event, TISCO willing to be responsible for actual damages in any cases such as publicly official apologies and financial or nonfinancial compensation