



HUMAN RIGHTS DUE DILIGENCE

SUMMARY REPORT 2023

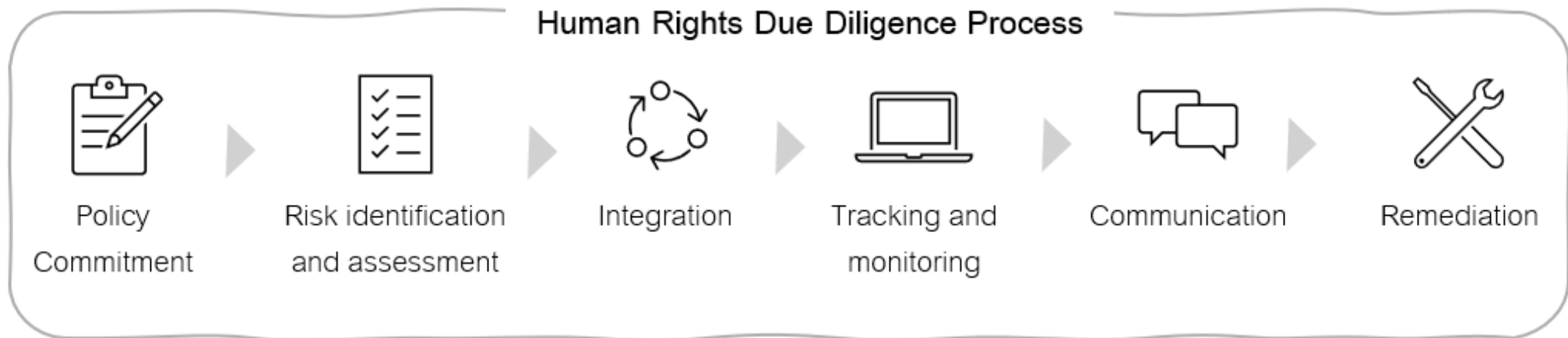
CARABAO GROUP PCL.



BACKGROUND

Carabao Group PCL. (CBG) is committed to conducting business responsibly and ethically, while strictly respecting, promoting, and adhering to human rights principles as stipulated by law and international practices and guidelines including the United Nations Guiding Principles on Business and Human Rights (UNGP), the ILO Declaration on Fundamental Principles and Rights at Work, the Universal Declaration of Human Rights, and the United Nations Global Compact (UNGC).

To demonstrate our commitment, we have established the Human Rights policy and implemented a comprehensive human rights due diligence (HRDD) process in accordance with the UNGP covering all business activities in Thailand and business activities in the supply chain.





HUMAN RIGHTS RISK ASSESSMENT PROCESS

CBG conducted human rights risk assessment to identify and assess salient risk issues throughout the business activities and operation as well as activities of the supply chain through desk research and stakeholder engagement with reference to [UNGC](#) and Thailand's SEC's [HRDD for Listed Companies](#). The risk assessment process is as follows:

1.**Identify human rights risks**

Identify the risks, causes, and effects of human rights risks in the company's operations and the value chain

2.**Assess inherent risks**

Assess inherent human rights risks based on impact and likelihood level, regardless of mitigation measures/actions.

3.**Identify mitigation measures**

Identify guidelines/ measures to control/ mitigate human rights risks in each issue

4.**Assess residual risks**

Assess residual human rights risks based on impact and likelihood level based on existing mitigation measures/actions

5.**Identify remediation measures**






Identify appropriate risk mitigation measures and impact prevention mechanisms



SCOPE OF HUMAN RIGHTS RISK ASSESSMENT

Companies Covered in the Assessment



Business Activities				Activities in supply chain
 Employment practice	 Production	 Sales & Distribution	 Supply chain management	 Employment practice
Affected rights holders				
<ul style="list-style-type: none"> Employees 	<ul style="list-style-type: none"> Employees Communities around the operational sites 	<ul style="list-style-type: none"> Target communities of traditional trade Consumers 	<ul style="list-style-type: none"> Suppliers 	<ul style="list-style-type: none"> Suppliers' employees

All affected rights holders also include vulnerable people such as women, children, pregnant women, people with disability, elderly, LGBTQI+, indigenous people, migrant workers, etc.



CBG HUMAN RIGHTS RISK REGISTER

15 human rights risk issues identified in CBG’s operations and supply chain

Affected rights holders				
Employee	Consumer	Community	Supplier	Supplier’s employee
Employment practices	Production, Sales & Distribution		Supply chain management	Employment practices
<ul style="list-style-type: none"> Working conditions Illegal forms of labor* Freedom of association & collective bargaining Discrimination** & harassment Health & safety Data privacy 	<ul style="list-style-type: none"> Health & safety Data privacy 	<ul style="list-style-type: none"> Health & safety Community standard of living and hygiene 	<ul style="list-style-type: none"> Discrimination Data privacy 	<ul style="list-style-type: none"> Working conditions Illegal forms of labor Freedom of association & collective bargaining Health & safety
Activities in own operations				Activities in supply chain

Note: * Illegal forms of labor include forced labor, human trafficking, and child labor.

** Discrimination based on race, nationality, gender, gender identity, language, religion, education, and any other status in the workplace, in the employment process, in compensation considerations (inequal remuneration), and in performance evaluations.



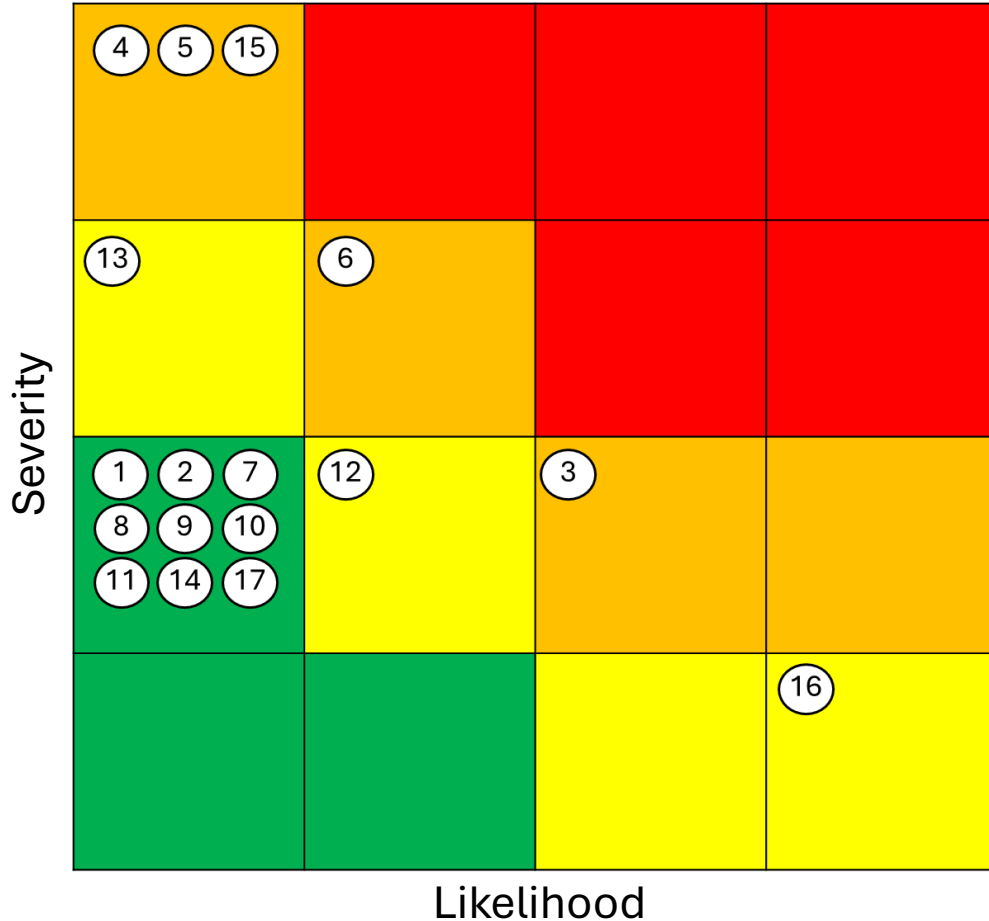
HUMAN RIGHTS RISK ASSESSMENT CRITERIA

LIKELIHOOD LEVEL	LIKELIHOOD		
Critical (4)	Occurs at least 4 times a year	or 80%-100% chance of occurrence	
High (3)	Occurs 2-3 times a year	or 50%-79% chance of occurrence	
Moderate (2)	Occurs once a year	or 10%-49% chance of occurrence	
Low (1)	Occurs less than once a year	or less than 10% chance of occurrence	

SEVERITY LEVEL	SCALE	SCOPE	REMEDIABILITY
Critical (4)	Significant impact on health causing disability or fatality	Impact to 80%-100% of a group of stakeholders	Impossible to restore or take longer than 5 years to restore the impact
High (3)	Moderate impact on health with more than 3 days of loss time	Impact to 50%-79% of a group of stakeholders	Take 3 to 5 years to restore the impact
Moderate (2)	Slight impact on health with less than 3 days of loss time	Impact to 10%-49% of a group of stakeholders	Take 1 to 3 years to restore the impact
Low (1)	No impact on health (first aid)	Impact to less than 10% of a group of stakeholders	Take less than a year to restore the impact



CBG HUMAN RIGHTS RISK PRIORITIZATION



EMPLOYMENT PRACTICES

Right holder: **Employees**

1. Illegal forms of labor
2. Freedom of association & collective bargaining
3. Working conditions
4. Harassment
5. Health & safety
6. Data privacy

SUPPLIER'S EMPLOYMENT PRACTICES

Right holder: **Supplier's employees**

7. Illegal forms of labor
8. Freedom of association & collective bargaining
9. Working conditions
10. Health & safety

PRODUCTION

Right holder: **Consumers**

13. Health & safety
14. Data privacy

Right holder: **Communities**

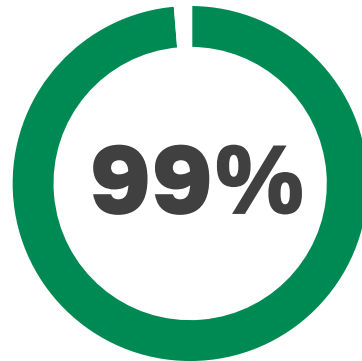
15. Health & safety of communities surrounding operational sites
16. Health & safety of target communities of traditional trade
17. Community standard of living & hygiene of communities surrounding operational sites

Risk level: ■ Low ■ Moderate ■ High ■ Critical



CBG HUMAN RIGHTS RISK PRIORITIZATION

OWN OPERATIONS



of revenue-generating subsidiaries were assessed



of revenue-generating subsidiaries were identified with human rights risks

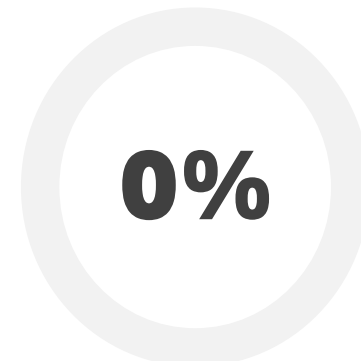


of identified human rights risks had mitigation measures

CONTRACTORS & TIER-1 SUPPLIERS



of total critical tier 1 suppliers were assessed



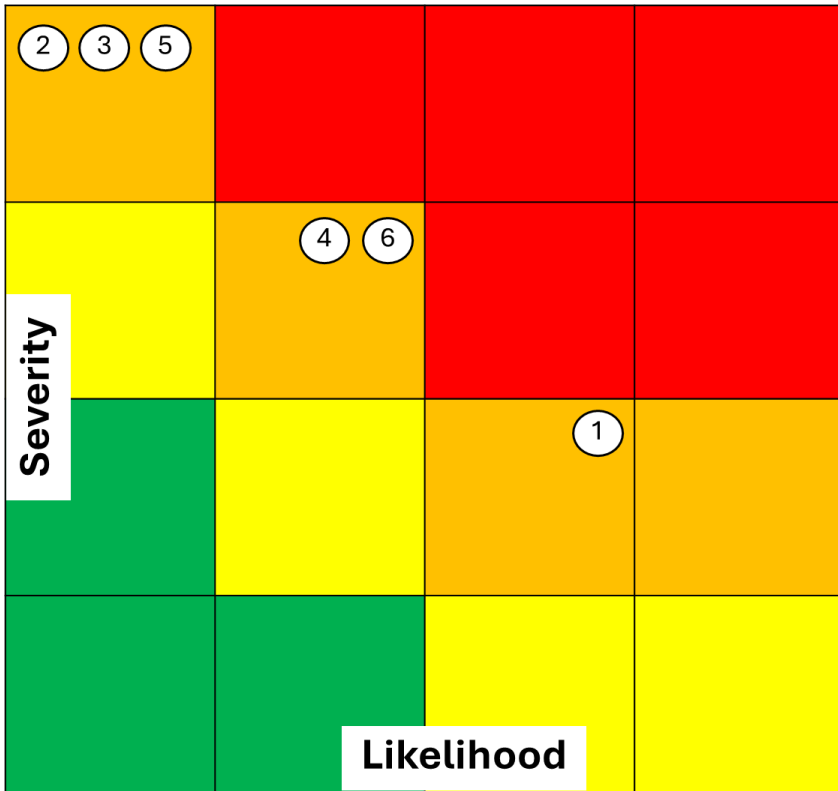
of total critical tier 1 suppliers were identified with human rights risks



of identified human rights risks had mitigation measures



SALIENT ISSUES & MITIGATION MEASURES



CBG has identified five human rights issues with high risk levels. However, when considering mitigation measures having in place and relevance of the issues to the Company, CBG has identified **TWO salient human rights issues** throughout its operations and supply chain:



1. Working Condition



2. Data Privacy

EMPLOYMENT PRACTICES

Right holder: **Employees**

- 1. Working conditions*
- 2. Harassment
- 3. Health & safety
- 4. Data privacy*

PRODUCTION

Right holder: **Communities**

- 5. Health & safety of communities surrounding operational sites

**Salient issues*



1. Working Conditions



Risk level: High

Affected rights holder: Employees

Risk: Logistics accidents during field work

Mitigation measures:

- Establishing the human rights policy and code of conduct
- Welfare committee formulates recommendations on working conditions to address employees' needs effectively
- Ensuring strict compliance with laws and regulations
- Designing work plans appropriate to the working environment of employees

2. Data Privacy



Risk level: High

Affected rights holder: Employees

Risk: Collection and disclosure of personal information

Mitigation measures:

- Establishing the personal data protection policy and code of conduct
- Appointing a data privacy officer
- Setting the access and retrieval rights of employee's personal data
- Setting compliance and remediation processes for violations of personal data privacy



REMEDIATION ACTION TAKEN

CBG is committed to conducting a human rights risk assessment through a systematic periodic reviewing process and in accordance with risks and mitigation measures. The Company has mitigation plan covering 100% of operational sites and continues to review and improve the Human Rights policy to be in line with current laws, regulations, and international standards.

In 2023, there was no case of human rights violation; therefore, no remediation action was taken. However, in case of human rights violations, CBG has provided whistleblowing channels for reporting incidents of human rights violations or non-compliance with the Company's Human Rights policy.

