

Human Rights Policy



BTS GROUP HOLDINGS PUBLIC COMPANY LIMITED

June 22, 2018

Human Rights Policy

BTS Group Holdings Public Company Limited (the “Company”) is committed to maintain its position as a sustainable and responsible organization. To that end, the Company ensures that the treatment of its customers, employees, communities, and business partners is centered on their well-being and maximizes the shared value created for them and BTS Group. In this regard, the Company conducts a periodic human rights due diligence in all of the Group’s value chain as firmly stated in its Code of Business Conduct.

To ensure compliance with human rights principles and articulate the Group’s commitment towards responsible and transparent business operations, the Company has published a Human Rights Policy in 2018. This 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); 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 Human Rights Policy shall serve as BTS Group’s official group-wide corporate standards on human rights management to ensure standardized management across all activities.

1. Definition

BTS Group or the Group	refers to the Company and its subsidiaries
Business Partner	refers to suppliers of products and services, including contractors and service providers of the Company, its subsidiaries and joint ventures
Customer	refers to all individuals that pay for goods and services of the Company, its subsidiaries and joint ventures
Employee	refers to individuals employed at any level by the Company, its subsidiaries and joint ventures
Joint venture	refers to company in which less than 50% share is held directly and indirectly by the Company
Subsidiary	refer to company in which more than 50% share is held directly or indirectly by the Company

2. Scope

This Human Rights Policy applies to all business activities throughout the Company's own operations, business partners (suppliers and sub-contractors), subsidiaries, and joint ventures. The Company expects all aforementioned stakeholders to comply with this Human Rights Policy through integrating this policy and applying it into their own operations, thus working with the Company towards maintaining a responsible value chain.

3. Practices and Procedures

The Company utilizes a human rights due diligence process which is aligned with the UN Guiding Principles on Business and Human Rights to guide its management of all human rights issues in the Group's value chain. This human rights due diligence process covers a human rights risk assessment, risk prevention and mitigation measures as deemed necessary from the assessment, appropriate remediation in cases of human rights violations, and a monitoring and reporting process of the performance. The Company also reviews this Human Rights Policy as part of the human rights due diligence process periodically.

To guarantee effective application of this Human Rights Policy, the Company expects all employees and business partners to have awareness of the subject, and have an adequate competency to be able to apply these expectations into their own activities.

The Company's human rights management comprises four key areas: employees; communities and environment; business partners; and customers.

3.1 Employees

The Company's policies and procedures on human resource management is in alignment with international labour standards and human rights. The Company ensures fair working conditions, installs systems that provide the safest working environments for employees, promotes diversity and inclusion in its culture to prevent discrimination, and provides employees with avenues to express their rights to freedom of association and/or collective bargaining.

The Company also provides systematic channels for employees to express grievances and recommendations. Grievances will be addressed promptly and appropriately, with remediation provided in the case of human rights violations.

3.2 Communities and Environment

The Company operates its business respectfully towards surrounding communities and environments throughout all projects in all stages. The Company maintains communication with local communities, and takes actions to ensure that there are minimum impacts to their well-being and quality of life. Beyond compliance with local regulations, the Company's operations, including but not limited to

waste management and noise pollution management, are also in compliance with international standards such as ISO 14001:2004 (EMS) and OHSAS 18001:2007 (Health and Safety).

The Company also provides systematic channels for communities to express grievances and recommendations. Grievances will be addressed promptly and appropriately, with remediation provided in the case of human rights violations.

3.3 Business Partners (Suppliers & Sub-contractors)

The Company promotes compliance towards human rights principles for all its business partners, including suppliers and sub-contractors by embedding human rights principles in all supply chain-related processes, from screening and selection to termination and extension of contracts. There is a supplier selection process with regular assessment assigned periodically, as well as an annual suppliers meeting to ensure that procurement and subcontracting is transparent, fair, and auditable. Some of the human rights issues, the Company assesses of its suppliers and sub-contractors include but are not limited to fair working conditions, freedom from discrimination, and safe and healthy workplaces. This assessment ensures equal opportunities for all, and prevents illegal labour, such as child labour, slavery, migrant labour, and forced labour.

The Company conducts regular reviews of business partners to assess potential human rights impacts, and establishes mitigation measures in case of human rights violation in supply chain. Penalties have been set for business partners who fail to maintain compliance with the expressed guidelines, manuals, or regulations regarding human rights principles in the supply chain.

3.4 Customers

The Company is committed to upholding customer rights, particularly in terms of personal health and safety, accessibility, and privacy. As a public transit operator, the Company realizes that the Group's operations can have significant impacts on individuals' access to good living standards.

The Company provides safety to customers through compliance with national and international safety standards, and extensive training for security officers. The Company also monitors any potential impacts on customers through an annual customer satisfaction survey and customer relationship building activities. There are systematic channels for customers to express grievances and recommendations. Grievances will be addressed promptly and appropriately, with remediation provided in the case of human rights violations.

4. Reporting and Disclosure

The Company is committed to disclose the Group's human rights commitment and performance in the Annual Sustainability Report and the Company's website.