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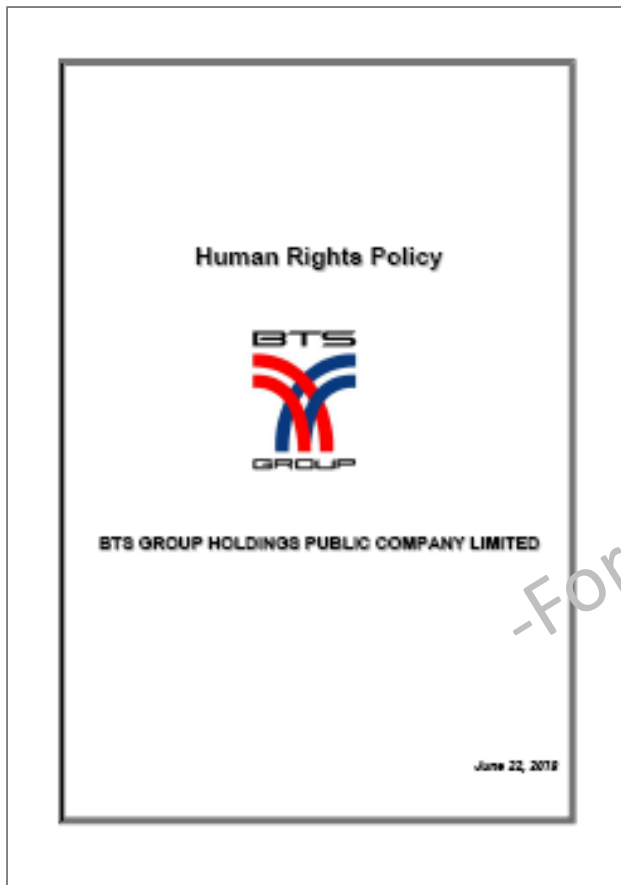
Human Rights Due Diligence Disclosure

Human Rights Due Diligence Process



Source: UN Guiding Principles on Business and Human Rights

BTS Group Human Rights Policy

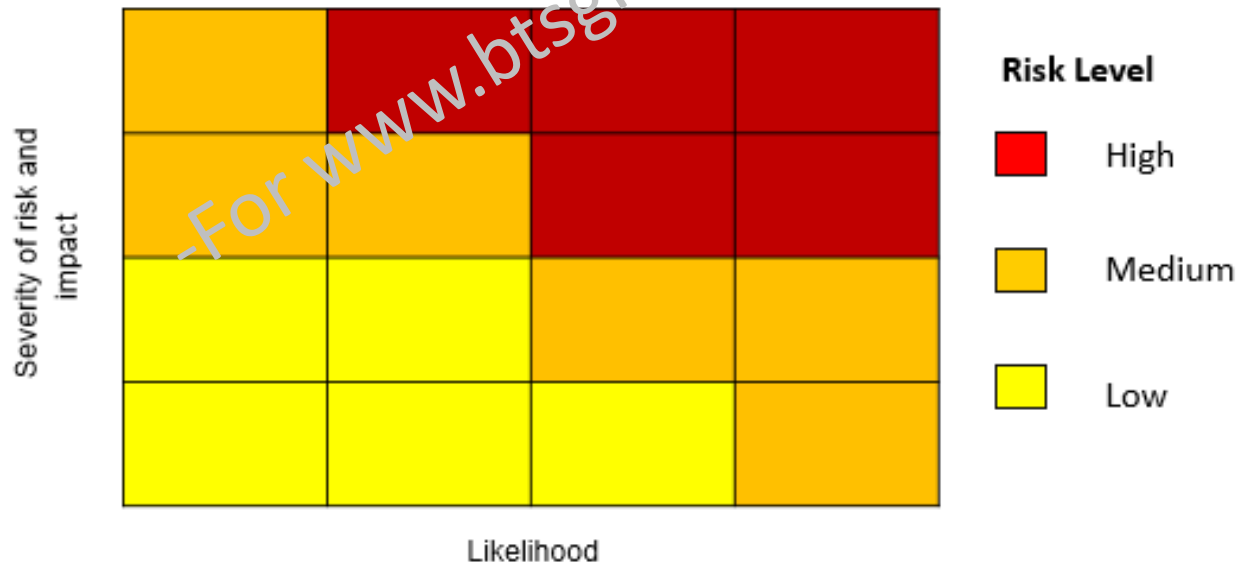


- The scope of the human rights policy refers to BTS Group's expectation on human rights compliance not only in their own operation but also subsidiaries, joint-venture, business partners.
- BTS Group has made commitments in relation to the human rights focusing four areas: employees, communities, suppliers & sub-contractors and customers.
- Human rights topics in the policy are, for example, discrimination, working hours and remuneration child labour, force labour, employment practices, freedom of association and grievance mechanism.

Human Rights Risk Assessment: Risk Matrix



In order to identify human rights risks and prevent human rights violations or other adverse impacts on human rights from occurring in its operations, BTS Group has performed a **human rights risk assessment that covers its entire value chain**. This human rights risk assessment is part of the human rights due diligence process, and allows BTS Group to identify, prevent, and mitigate human rights risks throughout the activities of its **direct operations and subsidiaries**. This includes **both internal stakeholders such as employees, as well as external stakeholders such as suppliers, communities, and customers**, and comprehensively covers **vulnerable groups**. The matrix below was used to rank human rights risks in terms of likelihood and severity.



BTS Group Holdings PCL

Mass
Transit

Media

Services

Property
Development

Hospitality

Food

E-payment

Source: BTSG Annual Report 2016/2017 P.38-39

Human Rights Risk Assessment Criteria: Severity



Severity Level	Scale (seriousness of impact)	Scope (How many people are or will be affected)	Irremediable Nature (Difficulty to restore the people impacted to a situation before impact)
Critical (4)	Significant impact to health and safety: physical disability or fatality	Impact to all stakeholders in the group	Impossible to restore or will take longer than 5 years (≥ 5 years) to restore the impact
High (3)	Moderate impact to health and safety: serious injury that needs rehabilitation (loss time injury)	Impact to most stakeholders in particular stakeholder group	Take 3 to 5 years ($3 \leq n < 5$) to restore the impact
Medium (2)	Slight impact to health and safety: minor injury or illness (no loss time)	Impact to some stakeholders in particular stakeholder group	Take 1 to 3 years ($1 \leq n < 3$) to restore the impact
Low (1)	Minor impact to health and safety: first aid case	No negative impact to stakeholder	Take less than a year (< 1 year) to restore the impact

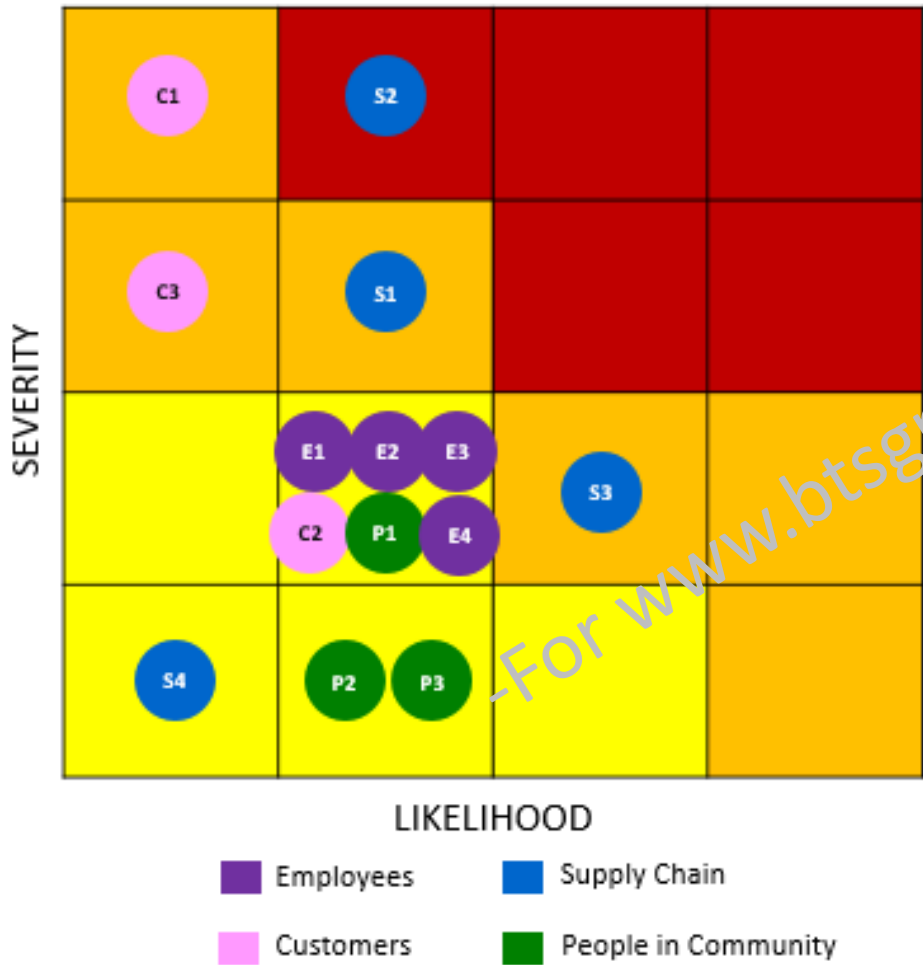
Human Rights Risk Assessment Criteria: Likelihood



Likelihood level	Likelihood
Very likely (4)	Such human rights issues have occurred consistently from the past until present.
Likely (3)	Such human rights issues have happened in the past and also occurred very often at the present.
Unlikely (2)	Such human rights issues have happened in the past and also occurred sometimes at the present depending on operation of business units.
Very unlikely (1)	Such human rights issues have never occurred in our business operation but have occurred in the industry of the operation.

Likelihood will be considered based on the local environment or context – the likelihood of a risk occurring is greater in a high risk operating environment (UN Guiding Principle 19).

Outcome of Human Rights Risk Assessment



- E1, S2, C1, P1 Health and Safety
- E2, S3 Working Conditions
- E3, C3 Discrimination/Accessibility and Inclusion
- E4 Freedom of Association
- S1 Illegal Forms of Labour
- S4, C2 Data Privacy
- P2 Resettlement
- P3 Environmental impacts

The aforementioned criteria for severity and likelihood are used to determine both inherent and residual risks. Residual risks are risks after mitigation measures have been taken, and thus reflect the effectiveness of such mitigation measures and guides the prioritization of **salient human rights risks**. Through assessing human rights risks for all operation sites, the health and safety of suppliers' workforce (S2) were identified as a salient human rights issues for BTS Group.

Supply Chain Management (Health and Safety)



Description:

- Since business activities of some BTSG's suppliers largely involve with labour intensive activities. There is high likelihood and severity with health and safety issues of suppliers' workers, for instance, work accidents during operation or maintenance works in mass transit system

Activity at risk:

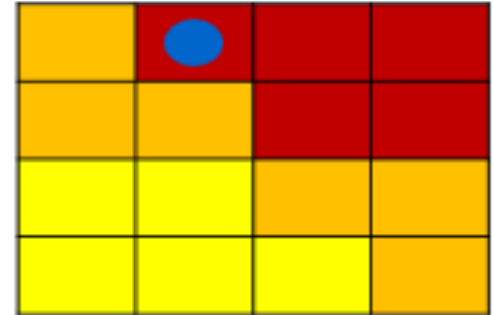
- Subcontractor's routine operation and maintenance activities in mass transit system.

Relevant Right Holders:

- Children, migrant workers, suppliers and contractors

Mitigation action:

- Selection process and regular assessment carried out on a regular basis
- Regular suppliers meeting
- Provide safety training to contractor's staff before working in BTS system, focusing on safety and health as well as environmental impact controlling.
- Control site access for all activities of contractors before working in BTS system.
- Approve the work permit for high risk activities such as working at height, hot work, confine space.
- Provide APOSTLE course training to contractor's staff in order to control their works in mass transit track.
- Track possession control to ensure the safety for all contractor's activities in mass transit track.
- Discuss safety and health as well as environmental issues in the regular contractor meeting.
- Perform contractor change control weekly.
- Perform regular contractor safety inspection.
- Perform contractor safety audit 2 times/year.



Human Rights Risk in Associated Activity



These salient human rights risks were identified for the following business activities:

Salient Issues	Associated activities					
	Mass Transit	Media	Property	Services (e-payment)	Services (Food & Beverage)	Services (Hospitality)
Health and safety of suppliers' workforce						
Total assessed where risks have been identified 1 from 6 activities						

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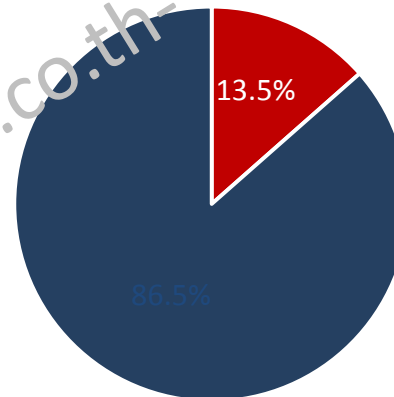
Result of Human Rights Risk Assessment: Own Operation



5 out of 37 BTSG's own operational sites identified with **high** human rights risks

Mass Transit	
1.	Bangkok Mass Transit System PCL
2.	BTS Infrastructure Services Co., Ltd.
3.	BTS Infrastructure Development Co., Ltd.
4.	Northern Bangkok Monorail Co., Ltd.
5.	Eastern Bangkok Monorail Co., Ltd

BTSG's operational sites in identified with human rights risks



- BTSG own operational sites with human rights risks
- BTSG own operational sites without human rights risks

Thus, out of **100%** of operations assessed, **13.5%** of operations were identified with **high** human rights risks.

Human Rights Risk Assessment: Results Summary



Remediation Actions Taken



In 2017, BTS Group had no cases of human rights violation. Thus, there were **no remediation actions taken nor necessary.**

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