



HUMAN RIGHTS POLICY

BTS Group Holdings Public Company Limited

14 JUNE 2021

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Human Rights Policy

BTS Group Holdings Public Company Limited (the Company) is committed to maintaining its position as a sustainable and responsible organisation. To that end, the Company ensures that the treatment of its customers, employees, communities, and business partners is centered on their well-being and maximises the shared value created for them as well as the Company and its subsidiaries (BTS Group or the Group). In this regard, the Company conducts a periodic human rights due diligence in all of the Group's value chains as firmly stated in its Code of Business Conduct and is committed to respecting human rights in accordance with internationally accepted standards that have been mentioned as the guiding standards for the policy development.

To ensure compliance with human rights principles and articulate the Group's commitment towards responsible and transparent business operations, the Company published a Human Rights Policy in 2018. The Human Rights Policy (the 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); the UN Global Compact (UNGC); the Convention on the Rights of the Child; the Convention on the Rights of Persons with Disabilities; 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 Policy shall serve as BTS Group's official group-wide corporate standards on human rights management to ensure standardised management across all activities.

BTS is committed to preventing situations related to human rights violations from occurring – for example, human trafficking, forced labour, child labour, discrimination and harassment. In addition, BTS is committed to respecting human rights associated to these situations, i.e., the right to collective bargaining and freedom of association as well as ensuring the fair systematic treatment on equal remuneration.

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 or 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

Subsidiary refers to company in which more than 50% share is held directly or indirectly by the Company

Joint venture refers to company in which 50% share is held directly and indirectly by the Company

New Business Relations refers to the Company's new business activities, i.e., mergers and acquisitions, and different forms of investments

2. Scope

This Human Rights Policy applies to all business activities throughout the Company's own operations, and its Business Partners. 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 conducts a human rights due diligence process in a systematic way and in alignment 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 and risk identification in BTS's own operations, value chain, supply chain, as well as its Business Partners and New Business Relations. This includes risk prevention and risk process of the performance. Particularly, BTS takes into considerations human rights issues prior to entering New Business Relations.

The human rights due diligence process considers stakeholders and vulnerable groups of BTS's operation, value chain and New Business Relations. These can include employees, women, children, migrants, third-party contracted labour, local communities, people with mobility impairments and the elderly. Some examples of human rights issues covered in the human rights due diligence process are forced labour, child labour, discrimination, equal remuneration, freedom of association and right to collective bargaining.

To guarantee effective application of this Human Rights Policy, the Company expects all stakeholders 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 the 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

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 realises 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 Human Rights Due Diligence results in the Annual Sustainability Report and the Company's website.



Mr. Keeree Kanjanapas
Chairman of the Board of Directors
Chairman of the Executive Committee
Chairman of the Sustainability Committee
BTS Group Holdings Public Company Limited