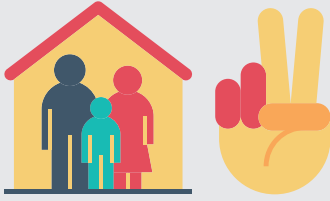


Human Rights Due Diligence Process



1

Step 1
Prepare and announce Human Rights Policy as a commitment (Policy commitment)

2

Step 2
Conduct Human Rights Due Diligence

Prepare human right due diligence checklists and assessments

3

Step 3
Conduct Human Rights Due Diligence Impact Assessment

consult with internal and external stakeholders and organizations to define vulnerable groups, aspects, risks, channels of complaints, and human right risk mitigation from impacts of business activities

4

Step 4
Set remedies for the event of human rights violation (assess to remedies). This includes risk assessment and indicator selection

use stakeholder engagement process when needed

5

Step 5
Monitor human right due diligence performance

report to executives and disclose publicly

Human Rights Due Diligence

Human rights has always been important to all sectors of the society. Bangchak is well aware of how human rights is a vital piece/element in conducting businesses, especially with the complex system of value chain and diverse group of stakeholders. The company aligns with the UN Global Compact, Universal Declaration of Human Right (UDHR), and United Nation Guiding Principles on Business and Human Rights (UNGPs) in fulfilling its business responsibility to comply with human rights. The company set a framework on this by setting guidelines for the Board of Directors, management executives and employees at all levels, for the compliance of everyone.

The company has conducted human rights due diligence in accordance with plans covering ever divisions and departments in the value chain of refinery business group, marketing business group, and suppliers (100% of human rights impact assessments and reviews for 2 business groups and suppliers in Thailand) (Disclosure 412-1)

Furthermore, the company has extend its human rights due diligence processes to its suppliers through Supplier Code of Conduct (SCOC) in labor and human rights section, occupational health and safety section, and environmental section.

Human Rights Risk Assessment

In the year 2019, the company assessed all human rights risks using a checklist of human rights impact assessment in accordance with the Human Rights Due Diligence (HRDD) process. It covered refinery and oil trading business, marketing business, and suppliers



Procurement



Production



Transportation



Marketing



Customers

Performance

Risk Assessment on Human Rights (Disclosure 412-1)

	Employees	Contractors & Tier 1 Suppliers	Subsidiaries
Percentage of risk assessed for the last 3 years	100%	100%	100%
Percentage of cases with identified risks	0%	0%	0%
Percentage of risk identified with measures to reduce impact	0%	0%	0%

From this assessment, it was found that there was no identified human rights risk in the operations of the company. Even then, the company still set guidelines to prevent and reduce human rights risks to identify vulnerable groups. Below is the list of vulnerable groups:

Community Rights

Risk Issue	Guideline to protect and reduce impact on human rights
Environment and safety from the company's activities Impact: <ul style="list-style-type: none"> The right to be protected by law Freedom of expression Rights to good quality of life 	Environmental <ul style="list-style-type: none"> Environmental quality control is better than the standards required by law Communication and Safety <ul style="list-style-type: none"> There is an environmental patrol to check, secure and communicate about the air quality of the communities around the refinery. Communication in advance before maintenance shutdown and resuming operations. There are ways to communicate with communities around the refinery, both in cases of emergencies and normal situations. There are drills rehearsals with the refinery secondary community Provide a venue for the community to voice out concerns, opinions or complaints about the operations of the company. Set up the remedy mechanism for the communities affected by the operations of the company via Call Center. The complainants are to be protected and the information is to be kept confidential.

Contractor rights

Risk Issue	Guidelines to protect and reduce impact on human rights
Occupational Health and Safety Impact: <ul style="list-style-type: none"> The right to be protected by law Rights to good quality of life 	Safety <ul style="list-style-type: none"> Comply with the laws regarding safety, occupational health and working environment, including the company's policy on Occupational Health and Safety. Provide training and ensure compliance with work safety regulations Procure basic personal protective equipment appropriate to work risk to preserve occupational health Occupational health <ul style="list-style-type: none"> Arrange annual health check-ups according to risk factors and basic health examination before starting daily work

Employee Rights

Risk Issue	Guideline to protect and reduce impact on human rights
Safety and health of employees at service stations Impact: <ul style="list-style-type: none"> Rights to good quality of life Rights to work 	Safety <ul style="list-style-type: none"> Organize training on oil types using a refueling device, refilling safely and actions to take in case of emergencies Organize training courses for service station controller and LPG service station supervisor Provide vapors and oil spill prevention equipment Manage emergency plan for fire control and evacuation Install security systems in every service station to monitor Occupational health <ul style="list-style-type: none"> Health check-up and drug testing of work station employees

Customer Rights

Risk Issue	Guideline to protect and reduce impact on human rights
<p>Safety and Occupational Health</p> <p>Impact:</p> <ul style="list-style-type: none"> Rights to good quality of life 	<p>Communication and Safety</p> <ul style="list-style-type: none"> Safety signs and communication to raise awareness in service stations There is a process for screening business partners in accordance with legal requirements.
<p>Protection of rights and personal information</p> <p>Impact:</p> <ul style="list-style-type: none"> Rights to equality by law The right to be protected by law Privacy rights 	<p>Protection of customer rights</p> <ul style="list-style-type: none"> There is a mechanism for accepting customer complaints through the Call Center, including operations, checking, solving and tracking complaints. Facilitate the disabled to access goods and services Warranty for the damages from the company's operations to customers when the incident is proven eligible <p>Personal information</p> <ul style="list-style-type: none"> Ask to voluntarily provide personal information to receive special privileges from membership cards. Protect customer's personal information and not distributing it to third parties



Goals in Y2020

- Increase comprehensive awareness of human rights for various departments and related parties
- Complete personal information management in all areas in the refinery and marketing business groups by establishing policies and procedures in keeping personal information. Assign an office responsible for rectifying the misuse of personal information

Collective Bargaining

The company provides an opportunity for communication between executives and employees in collective bargaining of employee benefits through Labor Union of the company that has been registered legally. At present, the Union has members who are the company's employees in 50.4% of the the total employees (Disclosure 102-41). The meeting with management is regularly held, reflecting the company's good will in supporting the rights to work which is in consistent with Universal Declaration of Human Rights (UNGP). Labor Union has the right to appoint an employee committee (currently there are a total of 13 people) in order to develop the welfare and benefits of employees together with management representatives. This allows employees to receive welfare that meets their needs and expectations appropriately. The consultation meetings happen every quarter per legal requirement. In the year 2019, from the review of welfare and benefits according to the needs and expectations of the employees, the company decided to increase the allowances for operational staff in order to support a better quality of life.

Measures for Receiving Complaints and Clues

The company provides channels for reporting complaints regarding human rights. For issues that violate legal ethics both from employees and other interested parties, there is a mechanism to protect employees and those who report the clues by creating a secret database system that can only be accessed by relevant parties. A committee will be established to handle the case. Committee members include representatives from different departments who have no vested interest in the case. Investigation proceeds in line with the regulations and will report results to those who filed the complaint. Channels of receiving complaints and clues are as follows:

- Information disclosure through Labor Unions or the company's employee committee
- Hot line 1651
- Electronic mail to the Internal Audit Department

Results in Y2019

- The company received no complaint on human rights issues.