

### 3.2.3 2023 Human Rights Risk Register – Example

| EGCO Group's High-Risk Human Rights Risk Assessment (Own Operations, Subsidiaries) - Thermal Power Plant |                       |   |   |  |  |                     |   |                     |   |
|--|-----------------------|---|---|--|--|---------------------|---|---------------------|---|
| Electricity, Stream, Wind power generations  |                       |   |   |  |  |                     |   |                     |   |
| Human Rights Issue   | Operational Boundary  | Description of Impact   | EGCO Human Rights Risks   | Rights Holders & Vulnerable Groups   | Individual Human Rights  | Inherent Risk Level | Existing Human Rights Controls  | Residual Risk Level | Additional Human Rights Controls 2023   |
| <b>Employee Practices</b>  |                       |   |   |  |  |                     |   |                     |   |
| Working Condition  | • Overseas operations | Employees' rights may be violated if they are not granted fair working conditions, including but not limited to fair compensation, access to leave, social security, and tasks that follow the job description. As work in the power plant can often expand beyond normal working hours during the day, and can often extend for long periods, particular attention must be paid proper overtime compensation and the scope of the job description.   | <ul style="list-style-type: none"> <li>Inadequate or inappropriate facilities and rules about their use</li> <li>Involuntary excessive long working hours and unpredictable or late demands to work overtime.</li> <li>Working overtime without pay</li> <li>Inadequate pay to ensure proper livelihood and standard of living</li> <li>Working beyond condition of employment contract without fair compensation</li> <li>Groundless disciplinary action and dismissal, and etc.</li> </ul>  | <b>Employee</b> <ul style="list-style-type: none"> <li>Men</li> <li>Women/Pregnant women</li> <li>Migrant workers</li> <li>Persons with disabilities</li> <li>LGBTQI+</li> </ul> | 3 Right not to be subjected to slavery, servitude, or forced labour<br>23 Right to social security, including social insurance<br>25 Right to enjoy just and favorable conditions of work<br>27 Right to adequate standard of living<br>28 Right to health   | High                | <ul style="list-style-type: none"> <li>Compliance with labour regulations</li> <li>Representation and leadership by Welfare Committee</li> <li>Overtime work policy that controls overtime work at no more than 36 hours per week</li> <li>Paid maternity leave (98 days)</li> <li>Paid leave for Buddhist meditation practice 90 days</li> <li>Employee provident and pension fund</li> <li>Work From Home during covid situation and reformed to be Work From Anywhere as new leave</li> <li>Grant personal leave 6 days with pay</li> <li>Manage the building standard to be complied with Legal standard by Building and Services Section</li> </ul> Mitigation Measure 2023 <ul style="list-style-type: none"> <li>Human Rights Policy</li> <li>Continuous improvement on Human resources</li> </ul>   | Medium              | 1) HR initiated trainings on Communication to minimize issues on work-related miscommunications.<br>2) Safety conducts continuous certifications on how to operate heavy equipment and defensive driving on vehicles.   |
| Health and Safety  | • Overseas operations | There are a variety of health and safety risks in the development and maintenance of power plants. In power plants, employees are exposed to physical health and safety risks, including both one-time incidents such as electrocution and heatstroke, and conditions developed over time such as hand arm vibration syndrome (HAVS) and exposure to chemicals. In the office, employees may be exposed to less immediate health and safety risks such as ergonomic injuries. Psychological health and safety risks are also present, such as overstress. | <ul style="list-style-type: none"> <li>Accident during construction</li> <li>Work related in accident e.g. machinery malfunction, road accident, accident when unloading objects</li> <li>Unsafe working condition e.g. extreme heat, fumes, odor, fire, leakage and explosion, electric shock, closed spaces, lack of proper PPE</li> <li>Ergonomic injuries e.g. carrying heavy object without proper tools</li> <li>Overtime work leading to increased stress and fatigue</li> <li>Lack of access to first aid and medical services</li> <li>Conflict with other rights holders (i.e. community customer/consumer, suppliers and contractor) may lead to violence, risk of health and safety of employees, and etc.</li> </ul> | <b>Employee</b> <ul style="list-style-type: none"> <li>Men</li> <li>Women/Pregnant women</li> <li>Migrant workers</li> <li>Persons with disabilities</li> <li>LGBTQI+</li> </ul> | 1 Right to life<br>25 Right to enjoy just and favorable conditions of work<br>27 Right to an adequate standard of living<br>28 Right to health   | High                | <ul style="list-style-type: none"> <li>Compliance with regulations related to labour, occupational health and safety, and environment</li> <li>Representation and leadership by committees such as Welfare Committee and Safety Committee</li> <li>Safety, Health, and Environmental (SHE) Management Standards Guideline</li> <li>Environmental Management System (EMS) in accordance with ISO14001:2015 and an established EMS Steering Committee</li> <li>Emergency response plans</li> <li>Procedures to identify hazards and safety risks</li> <li>Safety training for employees, including training on use of personal protective equipment (PPE)</li> <li>Tracking performance with regular safety audits and procedures for recording incident reports</li> <li>Requirement ISO45001: 2018 for some power plants (KEGCO certified)</li> </ul> | Medium              | 1) HR initiated trainings on Communication to minimize issues on work-related miscommunications.<br>2) Safety conducts continuous certifications on how to operate heavy equipment and defensive driving on vehicles.<br>3) Operations and Maintenance Supervisors extracted from the Operating Manual and or Plant Procedures in order to create more specific guidelines in order to prevent 2020-2022 incidents to likely happen.<br><br>Case 1:<br>1) Employee was given a RED AUTHORIZATION ID as a corrective action for the said violation.<br>2) Employee is not allowed to operate any forklift or similar lift truck. He shall only be limited on operating |
| Discrimination and Harassment  | • Overseas operations | Gender discrimination has been identified as a key issue for the power and utilities sector (BSR, Forbes), leading to unfair hiring practices, pay disparities, workplace harassment, and favorable treatment for majority groups in promotion and professional development. Beyond gender, discrimination can also occur on the basis of age, race, religion, nationality, ethnicity, and class.   | <ul style="list-style-type: none"> <li>Unfair hiring practices, unfair work assignment, or unfair termination/promotion, promotial denial due to their religion, age, ethnicity, gender, disability, color, or race (e.g. only accepting females to work certain tasks due to their looks and characteristics but not their ability to complete the work task)</li> <li>Sexual and non-sexual harassment (physical and verbal harassment) between employees or by supervisors</li> <li>Sexual abuse and violence, including "coercive" or transactional sex, rape and sexual assault</li> <li>Abuse and harassment around pregnancy</li> <li>Psychological abuse and intimidation</li> </ul>                                      | <b>Employee</b> <ul style="list-style-type: none"> <li>Men</li> <li>Women/Pregnant women</li> <li>Migrant workers</li> <li>Persons with disabilities</li> <li>LGBTQI+</li> </ul> | 6 Right to equality before the law, equal protection of the law, non-discrimination<br>18 Right to freedom of thought, conscience, and religion<br>19 Right to freedom of opinion, information, and expression<br>24 Right to work<br>25 Right to enjoy just and favorable conditions of work<br>35 Rights of minorities | High                | <ul style="list-style-type: none"> <li>Compliance with Labour Protection Act of Thailand</li> <li>Employee Code of Conduct prohibits discrimination</li> <li>Welfare Committees</li> <li>Policy on employment of the disabled</li> <li>Human Rights Policy</li> </ul> Mitigation Measure 2023 <ul style="list-style-type: none"> <li>EGCO Code of Conduct</li> <li>Personnel training programs to raise awareness and understanding of human rights on a regular basis</li> <li>Operating our business following the international standards regarding diversity and inclusion such as the Principles of the United Nations Global Compact (UNGC), and International Labour Organization Conventions (ILO)</li> </ul>   | Low                 |   |