



Human Rights Policy

The Electricity Generating Public Company Limited

As a leading company that sustainably generates electric power in Thailand and abroad, the Electricity Generating Public Company Limited, or EGCO, promotes and encourages respect of human rights throughout the company. EGCO also expects executives and employees in all levels to respect human rights of all stakeholders in order to ensure that the basic rights of all stakeholder groups are respected equally.

This Human Rights Policy applies to all companies where EGCO has management control. Additionally, the Policy encourages joint ventures, business partners, suppliers, and all stakeholders to be aware of and act in alignment with the principles expressed in this Policy:

1. Adherence to this Human Rights Policy in all business activities in alignment with the United Nations Universal Declaration of Human Rights (UNDHR) and the Core Conventions of the International Labour Organization (ILO Conventions).
2. Conducting all business activities while avoiding directly and/or indirectly creating adverse impacts towards the human rights of rights holders, such as employees, communities, stakeholders of suppliers and business partners, and customers.
3. Upholding human rights and the human dignity of all rights holders equally.
4. Inspecting human rights issues in all of its business activities, including direct impacts from own operations and impacts that EGCO may be involved in or have a role in supporting in every area of operation.
5. Communicating and ensuring understanding for all stakeholders in its business value chain, including subsidiaries, joint ventures and suppliers and business partners.

EGCO's Management shall continuously drive and support all necessary activities to achieve the results outlined above by the policy.

For your acknowledgement and comply accordingly

Effective May 31, 2019

A handwritten signature in black ink, appearing to read "Witoon Kulcharoenwirat".

(Mr. Witoon Kulcharoenwirat)
Chairman of the Board of Directors

The implementation guidelines for Human Right Policy Framework

Scope

This Human Rights Policy applies to all directors, executives, and employees across EGCO's operations, subsidiaries, and joint ventures. The Policy demonstrates how we respect human rights of our employees, suppliers, contractors, sub-contractors, governments, customers, and local communities around EGCO's operations. EGCO commits to respect human rights and comply with the laws and regulations governing the protection of human rights at the national and international levels.

EGCO commitments to prevent and respect human rights include non-discrimination treatments, anti-harassment, as well as prohibiting child labor, forced labor, human trafficking, and promote the right to freedom of association, collective bargaining and equal remuneration, and other rights. All relevant right holders must adhere to this human rights principle.

Partners that are not directly under EGCO operational responsibility, such as, business partners, suppliers, contractors and group companies in which EGCO has a substantial involvement, are expected to maintain their own performance standards that align with the EGCO Sustainability Management.

Definition

EGCO: This refers to the Electricity Generating Public Company Limited, including subsidiaries and joint ventures where EGCO has management control.

Employee: This refers to EGCO's employees who are employed under employment contracts in all positions.

Business Partners: This refers to agents, lobbyists and other intermediaries, associate companies, joint venture and consortia partners, governments, customers, and clients.

Suppliers: This refers to companies, individuals, or groups of individuals who are responsible for supplying raw materials, equipment, and services for EGCO. This includes suppliers, contractors, sub-contractors, brokers, consultants, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, and wholesalers.

Customers: This refers to Electricity Generating Authority of Thailand (EGAT), government agencies in which the countries that EGCO has its operations, electricity trading market, and companies that purchase products and services from EGCO.

Community: This refers to local government and local communities around EGCO operations.

Guidelines

EGCO regularly conducts human rights due diligence in accordance with the UN Guiding Principles on Business and Human Rights (UNGP), Principles of the United Nations Global Compact (UNGC), United Nations Universal Declaration of Human Rights (UNDHR), and the Core Conventions of the International Labour Organization (ILO Conventions).

EGCO due diligence process includes human rights risk assessment in EGCO operations, subsidiaries, and joint ventures and its value chain or activities related to its business. Human rights issues and criteria are also used as assessment criteria in merger and acquisition, joint venturing, or any new business investment. Human Rights mitigation and remediation are implemented where risks have been identified.

The human risk assessment covers several right holders and vulnerable groups such as women, children, indigenous people in the country where we operate, migrant labour, third party contracted labour, disabled people, pregnant women, and LGBTQI+ that are subjected to human rights violations.

EGCO actual and potential human rights issues are categorized as outlined below.

Labour Rights

- Promote non-discrimination in respect of employment and occupation and anti-harassment by accepting of diversity within the company, including the employment of individuals with disabilities, respecting gender equality and women's rights, also rights of indigenous peoples, rights of refugees and migrants, as well as recruitment of employees with knowledge and capacities that are appropriate for working in particular fields,
- Support proper and safe employment practices, including a safe and healthy working environment such as access to water and sanitation and working conditions (wage, working hours) that allow employees to work to their full potential without having to compromise their physical and/or mental health through the establishment of the welfare committee and the occupational health and safety committee, which both take responsibility in managing and ensuring compliance with relevant labour laws and regulations, and
- Respect all employees' and workers' freedom of expression, freedom of association and the effective recognition of the right to collective bargaining, equal remuneration, and grievance mechanisms and channels to provide suggestions.

Suppliers and Business Partners Rights

- Encourages suppliers and business partners to conduct their business activities in compliance with labour laws and international labour standards, including fair working hours and fair compensation,
- Prevent use of illegal labour, including forced labour, human trafficking, child labour, among suppliers and business partners by adhering to principles of business ethics and using employment contracts that are clear and fair,
- Support good employment, and provide employees with appropriate personal protective equipment in the practices of suppliers and business partners, and
- Encourage employees of suppliers and business partners to obtain knowledge through safety training programs, and strictly comply with safety guidelines.

Community and Environment Rights

- Committed to operating its businesses responsibly through giving due consideration towards potential impacts on communities and the surrounding environment. EGCO has announced its Environmental Policy, together with guidelines on conducting business activities while minimizing environmental impacts as much as possible, and
- Strengthen positive relationships with all stakeholders, and for fair and transparent treatment of stakeholders in order to prevent violations of stakeholders' rights.

Customer Rights

- Promote and prioritize customers' safety by providing personal protective equipment for customers while they are onsite within EGCO's areas of operations, and
- Respect customers' right to privacy by effectively managing personal data with a system that strictly prevents data leaks, with practices based on EGCO's policy on information security as the main guideline to maintain the digital security/ privacy of the customers.

EGCO has established various policies and management controls in accordance with human rights principles. Examples of such policies and management controls include:

- Whistleblowing Policy
- Fair Performance Evaluation Policy
- Occupational Health, Safety, and Environment Policy
- Shareholder Rights and Equal Treatment of Shareholders
- Internal Controls, Risk Management, and Business Ethics
- Prevention of Conflict of Interest
- Disclosure and Transparency
- Anti-Corruption Policy
- Personal Data Protection Policy

EGCO has tracked, monitored, and assessed its human right risks, as well as developed whistleblowing and complaint channels to gather issues and concerns related to human rights violations. Results gathered from these channels will be used to inform improvements, and publicly disclosed in Annual Report.

Implementation Guide of Non-Discrimination and Anti-Harassment Policy

Definition

Harassment: Harassment is defined as a course of comments or actions that are unwelcome, or should reasonably be known to be unwelcome, to the person towards whom they are addressed. Non-sexual harassment includes but is not exclusive to mobbing and bullying such as power harassment, receiving medical treatment, etc, while sexual harassment includes a sexual component.

Zero Tolerance: Zero tolerance against harassment and discrimination dictates that any allegations are taken seriously and handled confidentially and sympathetically. If allegations are confirmed, remedial action, disciplinary action, dismissal, or legal action will be taken.

Defined Escalation Process: System consisting of specific procedures, roles and rules for receiving complaints and providing remedy. Grievance mechanisms are also accepted here. It should be specifically specified in the company's public domain that the reporting of discrimination and harassment incidents is to be reported through the defined escalation process.

Corrective Action: Corrective action is a process of communicating with the employee and taking active measures to improve unacceptable behavior.

Disciplinary Action: A disciplinary action is a reprimand or corrective action in response to employee misconduct, rule violation, or poor performance. Depending on the severity of the case, disciplinary action can take different forms, including: a verbal warning, a written warning, a poor performance review or evaluation, a reduction in rank or pay and termination.

Guidelines

The company's purpose is to provide employees with a working environment free from discrimination and harassment, that is not limited to harassment regarding race, colour, sex, age, nationality, pregnancy status, sexual orientation, gender identity, cultural affiliation, religion, genetic information, physical or mental disability, personal characteristics or circumstances, or any other characteristic protected by applicable laws and regulations.

Employees at all locations worldwide and all levels of the EGCO group are responsible for avoiding any actions that may suggest any form of discrimination and harassment toward other people within the workplace. This includes contractors, suppliers, customers, and other non-employees, such as visitors involved in EGCO's business. The Company will actively investigate any allegations of discrimination and harassment, evaluate the conduct and the context of the behavior, and take appropriate action. If this Policy conflicts with any country's local laws, those laws will take precedence.

Employees are expected to understand their duties to adhere to the Non-Discrimination and Anti-Harassment Policy. When in doubt, consultation with the immediate supervisors and the Human Resource Division or the designated person to monitor compliance with the Policy is encouraged. Suspected violations of the Policy by other employees should be reported to their supervisor or responsible person. In such cases, cooperation should be rendered to support any investigation and fact-finding activities. The following are examples of the non-compliance with the Policy:

- Actions that violate the Policy such as discriminatory behavior or harassment from Intolerance of difference towards people of different races, sex, age, gender, religions, ethnic, skin color, ancestry, origin country, status or people with disability which could be in various forms, including but not limited to:
 - Physical or verbal harassment such as hate speech, insulting, belittling, name-calling, cyberbullying, or using non-verbal gestures and violence;
 - Discrimination that leads to a difference in treatment such as getting, or not getting a promotion because of a trait that does not relate to a job requirement;
 - Sexual harassment such as making a comment about a person's body, asking about sexual preference, telling obscene jokes or stories, whistling, catcalling, making sexual looks or gestures, sending unwanted texts, pictures, telephone calls, touching or forcing to touch others sexually, and attempting sexual assault;
 - Power abuse towards employees with lower status by using job progression as collateral such as playing favoritism, forcing employees to work overtime, threatening, mistreating, or abusing; and
 - Indirect harassment such as setting a working condition that gives some employees an advantage over other employees when it is not required in a job description.
- Requesting others to violate the Policy such as coercing others to discriminate against other employees or providing misleading information that leads to violation of the policy;
- Failure to promptly report a known or suspected violation of the Policy. The reason such as thinking the situation is not severe enough, fearing of retaliation, or having a conflict of interest with the employee involved;
- Failure to cooperate with the investigation or any fact-finding activities relating to the suspected violation of the Policy such as concealing the truth or providing misinformation during the investigation.
- Retribution against another employee for reporting a violation or concern such as victimization, isolation, insult, discrimination, or using their power to retaliate against the employee by pay deduction, demotion, job transfer, or forced resignation.

Failure to observe the Policy will result in a range of corrective measures (such as non-disciplinary actions, education, verbal warning and counseling) and disciplinary actions (such as a written warning, a poor performance review or evaluation, a suspension or severe cases, termination) including civil or criminal prosecution if such action is found to be illegal.

Non-Discrimination and Anti-Harassment

- Managed and operated all activities on the basis of equality, respect for each other and value of human dignity by considering equality and accepting differences and individual characteristics, any acts that may form discrimination and harassment toward other people are prohibited. EGCO will not tolerate any form of discrimination and harassment against others in the workplace, whether sexual harassment or non-sexual harassment.
- Established corporate culture, cultivate values and encourage all directors, executives, and employees to treat one another with dignity and honor.
- Promoted and ensured that the workplace environment is safe and suitable for work and has a pleasant atmosphere and will not tolerate any form of harassment.

Energy for life

- Provided programs to communicate, educate, and develop an understanding with EGCO executives, directors, and employees about workplace discrimination and harassment against others. EGCO will ensure to raise awareness and that everyone follows the policy by integrating the programs into orientation, training sessions and development programs, including public relations.
- Established mechanisms, procedures and escalated investigation process including whistleblowing for reporting incidents from individuals who have been mistreated and/or harassed in the workplace in order to prevent and resolve issues related to workplace discrimination and harassment of all types, including sexual and non-sexual harassment, as well as communicate the solution to whistleblowers.