
HUMAN RIGHTS MANAGEMENT

Management Approach

True Group's responsibilities as a telecommunication service provider, apart from delivering quality products and services to consumers, is to promote equal opportunities for access to information, content, and ICT services. In doing so, the Company must conduct business with ethics and moral principles, recognizing the dignity and value of every human being. True Group operates with respect for human rights of all stakeholders business in conformity with the human rights principles under Thai and international laws such as the UN Global Compact (UNGC) , ILO Declaration on Fundamental Principles and Rights at Work, Universal Declaration of Human Rights (UDHR), United Nations Guiding Principles on Business and Human Rights (UNGPs), and ILO International Labor Standards.

The Company has adopted the **Human Rights Policy** and **Human Rights Guidelines for Joint Venture Companies** as well as **Diversity and Inclusion Policy**, reflecting on equal opportunities and diversity in the workplace with measures to ensure equal treatment and human rights protection, regardless of gender, age, education, nationality, ethnicity, skin color, religion, sexual identity and disability status.

Human Rights Management Structure

The Corporate Governance Committee Board oversees the corporate human rights whereas the **Innovation & Sustainability Committee** manages the human rights at True. In addition, **Human Rights Working team** and **Human Resources Team** are responsible for day-to-day operation in compliance with the Human Rights policies and guidelines

Human Rights Training

The Company regularly provide human rights related trainings for executives and staff in order to understand the basic rights that everyone should have. This shall help to reduce the risks of human rights misconduct in business operation.

Collaboration with the Global Compact Network Thailand

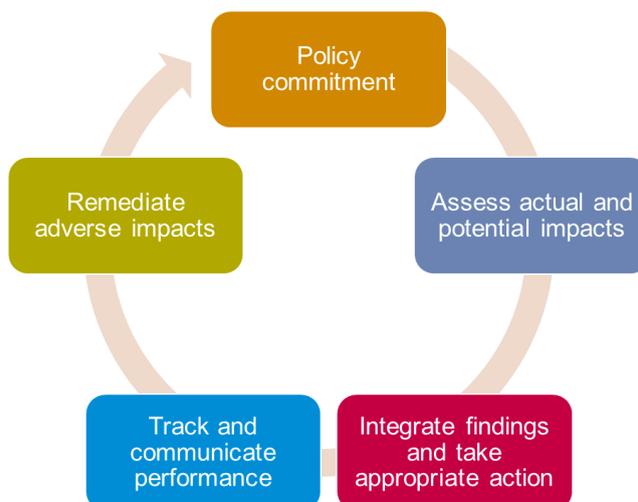
True Group is a founding member of **the Global Compact Network Thailand (GCNT)** and has participated in building awareness on human rights through human rights related issues including the right to freedom of expression through e-learning, meetings and seminars as well as providing guidelines and practices as a tool to other interested persons.

Human Rights Due Diligence

True Group conducts a human rights due diligence every two years in collaboration with our internal units, joint ventures, suppliers, and business partners to identify and prioritize human rights risks. True is committed to ensuring that its business conduct and practices comply with the principles of human rights. ***In 2020, the Company did not receive any human rights complaints.***

The human rights due diligence process includes five steps as follows:

Human Rights Due Diligence Process



Reference: UN Guiding Principles on Business and Human Rights

1. POLICY COMMITMENT

Through True Group’s Human Rights Policy, the Group commits to adhere to human rights principles in accordance with international standards which are the United Nations Universal Declaration of Human Rights (UNDHR), the United Nations’ Guiding Principles on Business and Human Rights (UNGPR), United Nations Global Compact, and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. The policy expects that all relevant stakeholders of True Group comply with its human rights commitments; the scope covers its own operations, suppliers, contractors, business partners and extending the coverage to business relations i.e. joint ventures, mergers and acquisitions.

Moreover, True Group has implemented a system to track, monitor and assess human rights risks as well as ensuring that all stakeholders have access to our whistleblowing and complaint channels. These processes will provide us with feedbacks and inputs for further improvement of our due diligence process, and for our reporting of human rights performances.

2. ASSESS ACTUAL AND POTENTIAL IMPACTS

True Group’s Human Rights due diligence and risk assessment processes covered 100% of own operation and relevant stakeholders throughout the value chains, including vulnerable groups that are at-risks of being impacted by our operations.

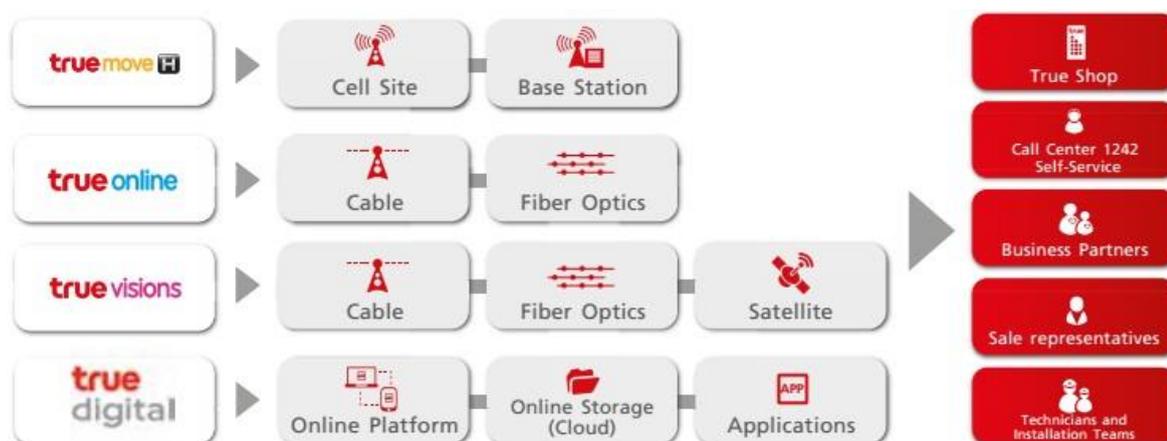
Human rights Risk Assessment

As an on-going risk management process, True group executes the human rights due diligence process to identify, prevent, mitigate and account for how the company addresses its adverse human rights impacts and risks from its activities and business relationships throughout value chain. As part of the process, True Group conducted human rights risk assessment, which covered 100% the company’s operations subsidiaries and relevant stakeholders throughout value chain – both internal (e.g. employees) and external stakeholders (e.g. suppliers, contractors, communities, customers and business relations including joint ventures, mergers, and acquisitions), as well as vulnerable groups (i.e. women, pregnant women, children, indigenous people, migrant labor, third-

party contracted labor, LGBTQI+, and elderly) – that may be or have been impacted by its activities.

The Human Rights risk assessment covers actual and potential human rights issues relating to forced labor, human trafficking, child labor, freedom of association, right to collective bargaining, equal remuneration, discrimination and other rights including employee health and safety, working conditions, community health and safety and standard of living, cybersecurity and data privacy.

Scope of True Group Human Rights Risks Assessment: True Value Chain



Methodology

Our human rights risk assessment process include the steps as follows:

1. Identification of Human Rights Issues:

- a. Identifying all relevant human rights issues related to True Group’s business activities in the value chain.
- b. Identifying affected rights holders (e.g. employees, communities, customers) and vulnerable groups (i.e. women, pregnant women, children, indigenous people, migrant labor, third-party contracted labor, LGBTQI+, and elderly)

Through screening of human rights issues that are relevant to True Group’s business activities and value chain, we reviewed peer benchmarking of similar industries/sectors and various international benchmarking resources. The scope of relevant human rights issues for True Group’s in 2020, as shown below:

Employees Rights	Community Rights	Customers Rights	Suppliers Rights
<ul style="list-style-type: none"> ▪ Safe and Healthy ▪ Working Conditions ▪ Discrimination ▪ Freedom of association and 	<ul style="list-style-type: none"> ▪ Land Acquisition ▪ Health and Safety ▪ Standard of Living 	<ul style="list-style-type: none"> ▪ Data privacy ▪ Freedom of Expression/ Freedom to Information ▪ Misleading 	<ul style="list-style-type: none"> ▪ Illegal forms of Labour ▪ Safe and healthy conditions ▪ Working conditions ▪ Data privacy

assembly ▪ Data Privacy		Marketing ▪ Discrimination ▪ Safety Content ▪ Cybersecurity ▪ Health and Safety	▪ Responsible Content Selection
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2. **Risk Rating:** our risks ratings consider the criteria scale of severity and likelihood (see below for more information).
- Inherent Risk Rating: are human rights risks that did not take into consideration any existing measures or controls True Group’s may have.
 - Residual Risk Rating: are human right risks after considering the existing measures and controls. High residual risks are considered human rights salient issues, in which require implementation of additional measures.

Human Rights Risks Assessment Matrix

The assessment of human rights risk level will be conducted using a matrix below to determine the significance of the human rights, where the Axis-X is the level of likelihood and Axis-Y is the level of severity.

Risk Rating Scale

Severity	Critical	High	High	High	High	High
	Serious	Medium+	Medium+	Medium+	High	High
	Moderate	Medium	Medium	Medium+	Medium+	Medium+
	Minor	Low	Medium	Medium	Medium	Medium
	Insignificant	Low	Low	Low	Medium	Medium
		Rare	Unlikely	Possible	Likely	Almost Certain
		Likelihood				

Remarks: Residual risks levels “High” and “Medium” are considered key risks that True Group needs to understand the effectiveness of its existing controls.

Determining Severity (Y-Axis)

Severity			
Severity Level	Scale <i>(seriousness of impact)</i>	Scope <i>(how many people are or will be affected)</i>	Irremediable Nature/Remediability <i>(difficulty to restore the people impacted to a situation before impact)</i>
Critical (5)	Significant impact to health and safety: fatality	Impact to all stakeholders in the group (People, Customer, Partner, Social&Enviroment)	Impossible to restore or will take longer than 5 years (>60 months) to restore the impact
Serious (4)	Moderate impact to health and safety: serious injury that needs rehabilitation (loss time injury)	Impact to most stakeholders in particular stakeholder group (3of4 Groups) (People, Customer, Partner, Social&Enviroment)	Take between 3 to 5 years (36-60 months) to restore the impact
Moderate (3)	Slight impact to health and safety: minor injury or illness (loss time injury)	Impact to some stakeholders in particular stakeholder group (2of4 Groups) (People, Customer, Partner, Social&Enviroment)	Take between 1 to 3 years (12-36 months) to restore the impact
Minor (2)	Minor impact to health and safety: first aid case	Impact to some stakeholders in particular stakeholder group (1of4 group) (People, Customer, Partner, Social&Enviroment)	Take between 0.5 to 1 year (1 year) to restore the impact
Insignificant (1)	NO impact to health and safety	No negative impact to stakeholder	Take less than 0.5 year (6 months) to restore the impact

Determining Likelihood (X-Axis)

Likelihood			
Level	Description	Frequency	Probability
Almost Certain	Could happen frequently. Continuously experienced. (Very likely to occur)	Regular occurrence Circumstances frequently encountered - daily/weekly/monthly	91–100%
Likely	Could happen often. Occurs frequently. (Likely to occur)	Circumstances occasionally encountered (few times a year)	61–90%
Possible	Could happen occasionally. Occurs occasionally, or several times in a service life. (May occur about half of the time)	Likely to happen at some point within the next 1-2 yrs	41–60%
Unlikely	Could happen but rare. Remote chance of occurrence; unlikely, but can reasonably be expected to occur. (Unlikely to occur)	Only likely to happen 3 or more years	11–40%
Rare	Remote possibility. Occurs only very rarely. Unlikely but possible. (Very unlikely to occur)	Has happened rarely / never happened before	0–10%

3. INTEGRATE FINDING AND TAKE APPROPRIATE ACTION

Results of Human Rights Risk Assessment

Risk Rating Scale

Severity	Critical	High	1 2 High	High	High	High
	Serious	Medium+	Medium+	Medium+	High	High
	Moderate	Medium	Medium	Medium+	Medium+	Medium+
	Minor	Low	Medium	Medium	Medium	Medium
	Insignificant	Low	Low	Low	Medium	Medium
		Rare	Unlikely	Possible	Likely	Almost Certain
		Likelihood				

Human Rights Salient Issues in TrueGroup

1. Health and safety of employees (road, accidents, serious communicable diseases, and pandemics)
2. Health and Safety of Supplier/Contractors (Safety equipment availability)

Level of Risk Impact: ■ HIGH ■ MEDIUM ■ LOW (More information in True Sustainability Report 2020, page 32-33)

Percentage of Sites with Human Rights Risks and Mitigation Plan (True Group)

- 100 %** of own operation sites were assessed (40 Operation Sites)
- 37.50 %** of activities in own value chain operation sites with human rights risk
- 100%** of all high risk activities with mitigation plan and remediation process implemented

In addition, True also conducted the supply chain risk assessment, the results were summarized as follows:

- Discrimination;
- Illegal Forms of Labour;
- Misleading Marketing; and,
- Community Health and Safety.

Percentage of suppliers with Human Rights Risks and Mitigation Plan (Tier 1 Supplier)

- 100%** of total Tier 1 supplier with were assessed (1,948 Tier 1 in 98 product categories)
- 10.73%** of Tier 1 supplier was found to be at human rights risk.
- 100%** of Tier 1 supplier with human rights risks and with mitigation plan and remediation process implemented

Percentage of Joint ventures with Human Rights Risks and Mitigation Plan (all joint ventures not included in Own Operations)

- 100%** of Joint ventures portfolios were assessed (5 number of investment portfolios)
- 100%** of Joint ventures portfolios with human rights risk
- 100%** of all high risk activities with mitigation plan and remediation process implemented

Mitigation Measures

HUMAN RIGHTS RISK	IMPACTED ENTITY	MITIGATION
Employee health and safety such as road accidents, serious communicable diseases, and pandemics	<ul style="list-style-type: none"> • Employees • Customers 	<ul style="list-style-type: none"> • Provided road accident prevention training courses for employees.
		<ul style="list-style-type: none"> • Set in place COVID-19 prevention measures for employees who have direct contact with customers, such as daily body temperature measurement, wearing a surgical mask when inside a customer’s home, and cleaning all equipment with alcohol
Supplier health and safety, such as safety equipment availability	<ul style="list-style-type: none"> • Business partners • Suppliers • Joint Venture 	<ul style="list-style-type: none"> • The company has a safety contractor management system that reflects the nature of the work carried out by suppliers and contractors.
		<ul style="list-style-type: none"> • Prepared a safety equipment checklist for at-risk suppliers.
		<ul style="list-style-type: none"> • Required existing and new suppliers as well as contractors to attend the training courses related to safe work practices.
		<ul style="list-style-type: none"> • Required all suppliers to complete a safety self-assessment

4. TRACK AND COMMUNICATE PERFORMANCE

In addition to the continuous review of human rights due diligence process and reporting of human rights performances, True Group has also been constantly tracking any cases of violations in which our operations may have to our stakeholders. To do so, we have implemented various communication channels that are easily access and always reachable by all stakeholders, to ensure that any violations that may exists are thoroughly mitigate and to provide appropriate remediation in the case of actual violations.

Communication channels detailed as follows: Internal Communications, True Connect Application, True Care Center Chatbot, Sustainability Report, Annual Report, True official Web site.

In addition, anyone can raise any questions or concerns regarding our human rights practices or violations, via:

- Email Address : auditcommittee@truecorp.co.th;
- Company Website: <http://www3.truecorp.co.th/new/sustain-operation>

5. REMEDIATE ADVERSE IMPACTS

In 2020, True Group reviewed the Human Rights Due Diligence Process for the third times. This review is conducted once every two years with preparing risk prevention and mitigation measures, providing reasonable remedies (both finance and non finance) in cases of violations, monitoring and reporting performance, as well as reviewing policy commitment to ensure maximum effectiveness in human rights management, and to identify human rights risks and impacts in True's operations. With the collaboration of all departments within True Group and our joint ventures, and representatives of suppliers and contractors, the review covered 100% of True Group's operations and value chain. ***In 2020, True Group had no cases of human rights violation. Thus, there were no remediation actions necessary and taken.***

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