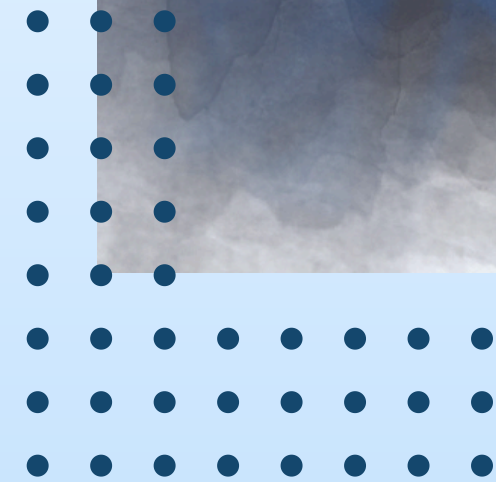




# Human Rights Due Diligence (HRDD)

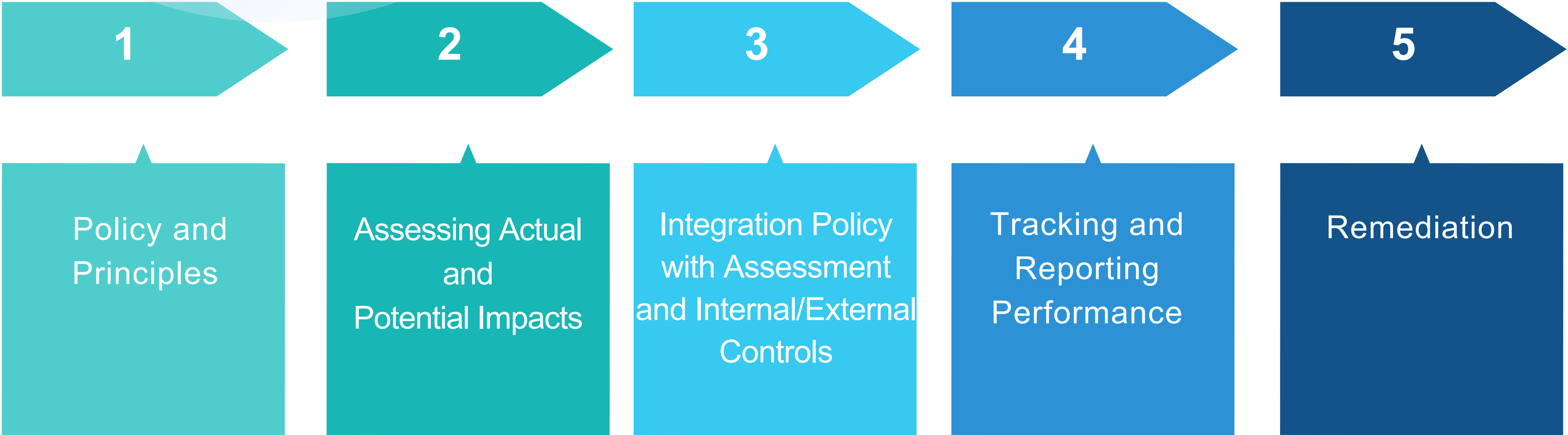


Bangkok Expressway and Metro Public Company Limited

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# 1. HUMAN RIGHTS DUE DILIGENCE PROCESS (HRDD)



## 2. BEM'S POLICY AND PRINCIPLES REGARDING RESPECT FOR HUMAN RIGHTS

The company mandates that its directors, executives, and employees are obligated to adhere to human rights principles, as well as to foster cooperation with all stakeholders to refrain from supporting or engaging in human rights violations. The company firmly adheres to international human rights standards such as UDHR, UNGC and UNGP.



### Guidelines for Implementation

- The company complies with human rights laws and principles, without supporting businesses that violate human rights.
- The company treats employees at all levels equally, according to the human rights principles.
- The company provides equal opportunities for all employees to work.
- The company treats all stakeholders equally, without discrimination.
- The company has undertaken the risk and impact assessment on human rights, both in the organization and its value chain.
- The company has a process for handling complaints.
- The company discloses its human rights performance annually.
- The company aspires and supports all stakeholders in its business value chain to adhere to human rights principles.

# 3. ASSESSMENT ON ACTUAL AND POTENTIAL IMPACTS, ARISING FROM COMPANY ACTIVITIES

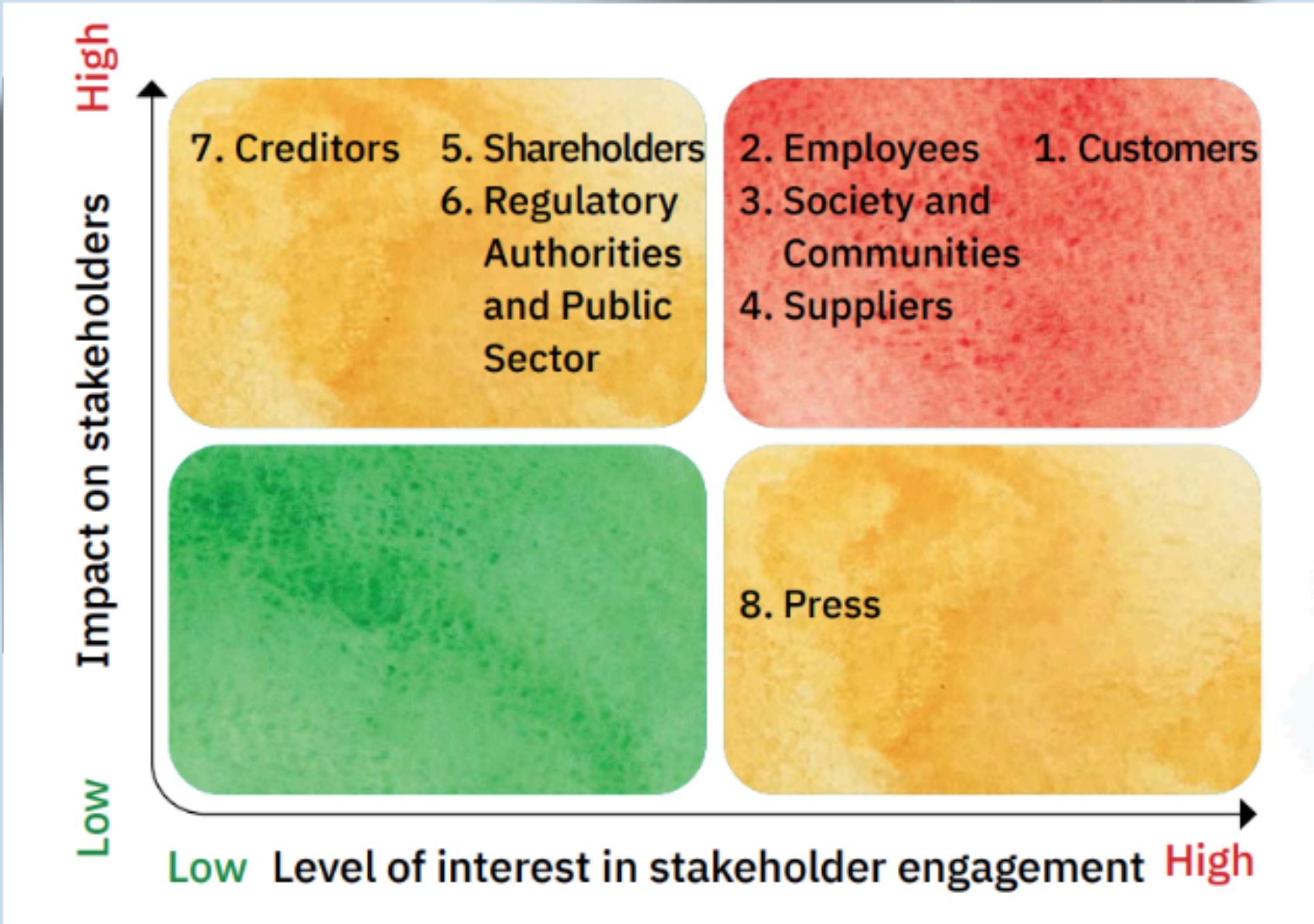
## • The Company's Value Chain



Value Chain	Planning and Management	Construction	Operations	Marketing & Sales	Service Delivery	After-sales Service
People affected by the company's activities	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> <li>• Customers</li> <li>• Regulatory Authorities and Public Sector</li> </ul>	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> <li>• Society and Communities</li> <li>• Regulatory Authorities and Public Sector</li> </ul>	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> <li>• Customers</li> <li>• Society and Communities</li> <li>• Regulatory Authorities and Public Sector</li> </ul>	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> <li>• Customers</li> <li>• Society and Communities</li> <li>• Regulatory Authorities and Public Sector</li> </ul>	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Customers</li> <li>• Creditors</li> <li>• Shareholders</li> <li>• Press</li> <li>• Regulatory Authorities and Public Sector</li> </ul>	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Customers</li> <li>• Society and Communities</li> <li>• Press</li> <li>• Regulatory Authorities and Public Sector</li> </ul>

# 3. ASSESSMENT ON ACTUAL AND POTENTIAL IMPACTS, ARISING FROM COMPANY ACTIVITIES

- **Prioritization**



BEM has established the criteria for analyzing and prioritizing stakeholders, namely the level of interest in stakeholder engagement and the level of impact from the Company’s operations on the stakeholders.

Top four stakeholder groups are :

- 1. Customers**
- 2. Employees**
- 3. Society and Communities**
- 4. Suppliers**

### 3. ASSESSMENT ON ACTUAL AND POTENTIAL IMPACTS, ARISING FROM COMPANY ACTIVITIES

#### • Human Rights - 35 Articles

1. Right to life
2. Right to liberty and security
3. Right to freedom from slavery / forced labour
4. Right to freedom from torture and degrading treatment
5. Right to recognition as a person before the law
6. Right to equality before the law, non-discrimination
7. Right to freedom from war propaganda, and freedom from incitement to racial, religious or national hatred
8. Right to access to effective remedies
9. Right to a fair trial
10. Right to freedom from retroactive criminal law
- 11. Right to privacy**
12. Right to freedom of movement and residence
13. Right to asylum in other countries
14. Right to a nationality
15. Right of protection for the child

16. Right to marriage and forming family
17. Right to own property
18. Right to freedom of believe and religion
- 19. Right to freedom of opinion, information and expression**
20. Right to freedom of assembly
- 21. Right to freedom of association**
22. Right to participate in public life
- ❖ 23. Right to social security
- 24. Right to work**
25. Right to enjoy just and favorable conditions of work
26. Right to form / join trade unions and to protect working interests
27. Right to an adequate standard of living
- 28. Right to health**
29. Right to education
30. Right to participate in the cultural life of community

31. Right to self-determination and to natural resources usage
32. Right of detained persons to human treatment
33. Right not to be subjected to imprisonment for inability to fulfil a contract
34. Right of aliens due process when facing expulsion
35. Right of minorities

#### References:

- Universal Declaration on Human Rights
- International Covenant on Civil and Political Rights



### 3. ASSESSMENT ON ACTUAL AND POTENTIAL IMPACTS, ARISING FROM COMPANY ACTIVITIES



#### 1. Customers

- Right to privacy
- Right to freedom of opinion, information and expression
- Right to health



#### 2. Employees

- Right to privacy
- Right to freedom of opinion, information and expression
- Right to freedom of association
- Right to work
- Right to health



#### 3. Society and Communities

- Right to freedom of opinion, information and expression
- Right to health



#### 4. Suppliers

- Right to privacy
- Right to freedom of opinion, information and expression
- Right to work
- Right to health



# 4. INTEGRATION POLICY WITH ASSESSMENT, AND INTERNAL/EXTERNAL CONTROLS

## 4.1 Risk Prioritization

- Criteria for assessing human rights risks and impacts

Level of Risk/Impact	Likelihood	Impact			
		Severity of Impact on life and health	Severity of Impact on property, reputation and business	Scope	Remedy Ability
Very high	Almost certain within 1 year or occurs regularly (X > 90%)	Causing serious impact up to fatality	Causing severe impact on stakeholders and on the company's business operations, cannot be managed by the company, need external support	Affects all groups of stakeholders (100%)	Unable to remedy affected stakeholders (rights holders) to normal and/or requires a long recovery period (X > 5 years)
High	High likelihood of occurrence within 2-4 years/time (50% ≤ X ≤ 90%)	Causing severe health issues, permanent disability, but not fatality	Causing significant impact on stakeholders and on the company's business operations, but can be managed by the company	Affects most groups of stakeholders (> 50%)	Can remedy affected stakeholders (rights holders) to normal within a period ranging from 3 to 5 years (3 years ≤ X ≤ 5 years)
Medium	Moderate likelihood of occurrence within 5-7 years/time (30% < X < 50%)	Causing impacts on health and safety significant enough to require work stoppage	Causing moderate impact on stakeholders and on the company's business operations	Affects some groups of stakeholders (25% < X < 50%)	Can remedy affected stakeholders (rights holders) to return to normal within a period ranging from more than 1 year but less than 3 years (1 year < X < 3 years)
Low	Low likelihood of occurrence within 8-10 years/time (10% ≤ X ≤ 30%)	Causing injuries that require medical attention	Causes a slight impact on stakeholders and on the company's business operations	Affects only certain groups of stakeholders (< 25%)	Can remedy affected stakeholders (rights holders) to normal within a period ranging from 6 months to 1 year (6 months ≤ X ≤ 1 year)
Very low	Very low likelihood of occurrence more than 10 years/time (X < 10%)	No impact on health and safety (basic first aid)	No impact on stakeholders or on the company's business operations.	No impact on the relevant stakeholders.	Can remedy affected stakeholders (rights holders) to normal within a period of less than 6 months (X < 6 months)

# 4. INTEGRATION POLICY WITH ASSESSMENT, AND INTERNAL/EXTERNAL CONTROLS

## 4.1 Risk Prioritization

- Inherent Risk

Note : Assess risks before implementing measures

Table of risk prioritization

<u>Impact</u>	Very high			28	11	
	High			21, 24		
	Medium			19		
	Low					
	Very low					
		Very low	Low	Medium	High	Very high

Likelihood

- Residual Risk

Note : Assess risks after implementing measures

Table of risk prioritization

<u>Impact</u>	Very high					
	High					
	Medium	11	19, 21, 24, 28			
	Low					
	Very low					
		Very low	Low	Medium	High	Very high

Likelihood

Note: The meaning of the number.

11 : Right to privacy

19 : Right to freedom of opinion, information and expression

21 : Right to freedom of association

24 : Right to work

28 : Right to health

## 4. INTEGRATION POLICY WITH ASSESSMENT, AND INTERNAL/EXTERNAL CONTROLS

### 4.1 Risk Prioritization

- Definitions of each risk level

Risk levels	Definitions
Very high	Very high risk at an unacceptable level Operations must be stopped and immediate improvements need to be made in order to reduce the risk.
High	High risk at an unacceptable level Risk management must bring the risk down to an acceptable level, otherwise the approval from the Managing Director is required.
Medium	Acceptable risk with control measures, to prevent the risk from escalating to an unacceptable level
Low	A little bit risk

# 4. INTEGRATION POLICY WITH ASSESSMENT, AND INTERNAL/EXTERNAL CONTROLS

## 4.2 Risk Management

Human rights risk	Related issues	Measures or Policies regarding human rights
<b>Customers</b>		
Right to privacy	<ul style="list-style-type: none"> <li>The leakage of customers' personal data stored by the company</li> </ul>	<ul style="list-style-type: none"> <li>Disclosure Policy</li> <li>Personal Data Protection Policy</li> <li>Establishment of personal data protection committee and compliance with PDPA plans</li> <li>Information Security Management System Manual                             <ul style="list-style-type: none"> <li>Privacy and personal data protection</li> <li>Information access</li> </ul> </li> </ul>
Right to freedom of opinion, information and expression	<ul style="list-style-type: none"> <li>Information blockage and restriction on the customers' rights of opinion and expression</li> </ul>	<ul style="list-style-type: none"> <li>Manual/Procedures for suggestions management</li> <li>Employee training as well as provision of information to customer through all channels</li> <li>Setting appropriate measures for suggestions' collection</li> <li>Providing suggestion channels, i.e., the company website, customer service center, email, and enclosed letters</li> </ul>

# 4. INTEGRATION POLICY WITH ASSESSMENT, AND INTERNAL/EXTERNAL CONTROLS

## 4.2 Risk Management

Human rights risk	Related issues	Measures or Policies regarding human rights
<b>Customers</b>		
Right to health	<ul style="list-style-type: none"><li>• The environment affects customers' health, such as the spread of airborne diseases, MRT passenger fainted during crowded passenger conditions</li></ul>	<ul style="list-style-type: none"><li>• Medical care and first aid are administered according to the incident management handbook when illness occurs within the MRT area</li><li>• Managing and controlling the area to prevent communicable diseases in compliance with the law, such as conducting Legionella bacteria inspections in the air conditioning system</li><li>• Preventing and controlling serious contagious diseases within the area of responsibility as per prevention and control of serious contagious diseases procedure</li></ul>

# 4. INTEGRATION POLICY WITH ASSESSMENT, AND INTERNAL/EXTERNAL CONTROLS

## 4.2 Risk Management

Human rights risk	Related issues	Measures or Policies regarding human rights
<b>Employees</b>		
Right to privacy	<ul style="list-style-type: none"> <li>The leakage of personal or sensitive information</li> </ul>	<ul style="list-style-type: none"> <li>Establishment of personal data protection committee and compliance with PDPA plans</li> <li>The procedure on handling requests for exercising data subject's rights</li> <li>Information Security Management System Manual                             <ul style="list-style-type: none"> <li>- PDPA</li> <li>- Information access</li> </ul> </li> </ul>
Right to freedom of opinion, information and expression	<ul style="list-style-type: none"> <li>The company's limitation of rights to express opinions</li> </ul>	<ul style="list-style-type: none"> <li>Work Regulations</li> <li>Code of Conduct</li> <li>Internal Communication, e.g. HR4U</li> </ul>
Right to freedom of association	<ul style="list-style-type: none"> <li>The company obstructs the formation and participation in employee associations</li> <li>The company obstructs collective bargaining for welfare benefits</li> </ul>	<ul style="list-style-type: none"> <li>Human Rights Policy</li> <li>Employee welfare committee</li> </ul>

# 4. INTEGRATION POLICY WITH ASSESSMENT, AND INTERNAL/EXTERNAL CONTROLS

## 4.2 Risk Management

Human rights risk	Related issues	Measures or Policies regarding human rights
<b>Employees</b>		
Right to work	<ul style="list-style-type: none"> <li>• Arbitrary or unfair dismissal of employees</li> <li>• Preventing promotion or hindering career advancement of employees</li> </ul>	<ul style="list-style-type: none"> <li>• Work Regulations</li> <li>• Code of Conduct</li> <li>• Employment Contract</li> </ul>
Right to health	<ul style="list-style-type: none"> <li>• Pollution from business operations can have negative health impacts, such as dust problems and noise disturbances caused by company operations</li> <li>• Non-compliance with health and safety standards for employees</li> </ul>	<ul style="list-style-type: none"> <li>• Occupational Health and Safety Committee</li> <li>• Employee Welfare Committee</li> <li>• Pre-employment health examination, annual employee health check-ups, preparation of medical rooms, nurses, doctors</li> <li>• Controlling and maintaining areas to prevent contagious diseases legally</li> <li>• Preventing and controlling serious contagious diseases in the responsible area according to prevention and control of serious contagious diseases procedure</li> </ul>

# 4. INTEGRATION POLICY WITH ASSESSMENT, AND INTERNAL/EXTERNAL CONTROLS

## 4.2 Risk Management

Human rights risk	Related issues	Measures or Policies regarding human rights
<b>Society and Communities</b>		
Right to freedom of opinion, information and expression	<ul style="list-style-type: none"> <li>Complaints from community whom affected by company's operations, such as problems of dust and noise disturbances</li> </ul>	<ul style="list-style-type: none"> <li>Manual/Policy on suggestions management</li> <li>Employee training as well as provision of information to the community through all channels, and establish appropriate feedback collection measures</li> </ul>
Right to health	<ul style="list-style-type: none"> <li>Pollutions from business operations that have negative health effects, such as problems of dust and noise disturbances</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with relevant laws for operations to avoid causing health impacts on society and communities, such as conducting health hazardous operations</li> <li>Asset management and maintenance processes</li> <li>Environmental quality measurement</li> <li>Complaint management and follow-up processes</li> </ul>



# 4. INTEGRATION POLICY WITH ASSESSMENT, AND INTERNAL/EXTERNAL CONTROLS

## 4.2 Risk Management

Human rights risk	Related issues	Measures or Policies regarding human rights
<b>Suppliers</b>		
Right to privacy	<ul style="list-style-type: none"> <li>The leakage of suppliers' data, which affects trade competition</li> </ul>	<ul style="list-style-type: none"> <li>Policies and practices of supply chain management and secure storage for suppliers' data, with access rights</li> <li>PDPA compliance of suppliers (PDPA policy and practices)</li> <li>Non-Disclosure Agreements with suppliers/partners, for customer personal data</li> <li>Information Security Management System Manual - Privacy and Personal Data Protection</li> </ul>
Right to freedom of opinion, information and expression	<ul style="list-style-type: none"> <li>The company does not listen to the opinions of suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Supply chain management policy / provisions of complaints or feedback channels, such as call center, social media platforms and the company's website, as well as annual suppliers' satisfaction and expectation survey</li> </ul>

# 4. INTEGRATION POLICY WITH ASSESSMENT, AND INTERNAL/EXTERNAL CONTROLS

## 4.2 Risk Management

Human rights risk	Related issues	Measures or Policies regarding human rights
<b>Suppliers</b>		
Right to work	<ul style="list-style-type: none"> <li>• Arbitrary or unfair termination of suppliers</li> <li>• Unfair selection of suppliers</li> </ul>	<ul style="list-style-type: none"> <li>• Supply chain management policy / code of conduct / suppliers code of conduct, regarding society, human rights, and work forces</li> </ul>
Right to health	<ul style="list-style-type: none"> <li>• Suppliers' failure to comply with health and safety standards</li> <li>• Pollutions from business operations that have negative health effects, such as problems of dust and noise disturbances</li> </ul>	<ul style="list-style-type: none"> <li>• Personal protective equipment usage requirements</li> <li>• Medical care and first aid management for illnesses occurring within designated areas as per incident management manual</li> <li>• Controlling and maintaining areas to prevent contagious diseases legally</li> <li>• Preventing and controlling serious contagious diseases in the responsible area according to prevention and control of serious contagious diseases procedure</li> </ul>

## 5. TRACKING AND REPORTING PERFORMANCE

The company has processes in place for monitoring, auditing, and reporting on human rights performance, and continuously communicates and educates stakeholders to prevent potential negative impacts from the company's activities, and ensure that mitigation measures are adequate and effective, as well as monitor operations to prevent recurring risks.

### • Performance Highlights 2023



100% of the company's operations and business activities are assessed for human rights risks and impacts.



100% of the company's operations and business activities, identified as having high human rights risks, have impact mitigation measures and remediation processes in place.



There are no human rights violations throughout the value chain.

### • Grievance Channels for Human Rights

BEM offers channels to receive grievances and suggestions regarding human rights issues from stakeholders.

Grievances can be made through the following channels:



Contact BEM



**Information Service Center** : +66 (0) 2624 5200



**BEM Website**

: <https://www.bemplc.co.th/Contact?lang=en>



**E-mail:**

: [SDD@bemplc.co.th](mailto:SDD@bemplc.co.th)



**Sealed letter addressed to**

: Bangkok Expressway and Metro Public Company Limited  
(Branch Office 2)

189 Rama 9 Road, Huai Khwang, Bangkok 10310 Thailand

## 6. REMEDIATION

The company is committed to reducing the risk of potential human rights violations by conducting timely risk assessments to identify human rights violation scenarios throughout the value chain. The company has also conducted risk preventive and mitigation measures, with regular reviews to ensure maximum effectiveness.

In the event that the company's operations involve human rights violations, the company will provide initial assistance and then investigate the facts to determine appropriate and fair remedies for the affected rights holders, in accordance with legal requirements.



**BEM**

BANGKOK EXPRESSWAY AND METRO