



# HUMAN RIGHTS RISK ASSESSMENT SUMMARY REPORT 2024



**SOLID**  
& Sustainable  
**GROWTH**  
รากรฐานที่แข็งแกร่ง สู่การเติบโตอย่างยั่งยืน

THANACHART CAPITAL Public Company Limited

# TCAP's Human Rights Pathform

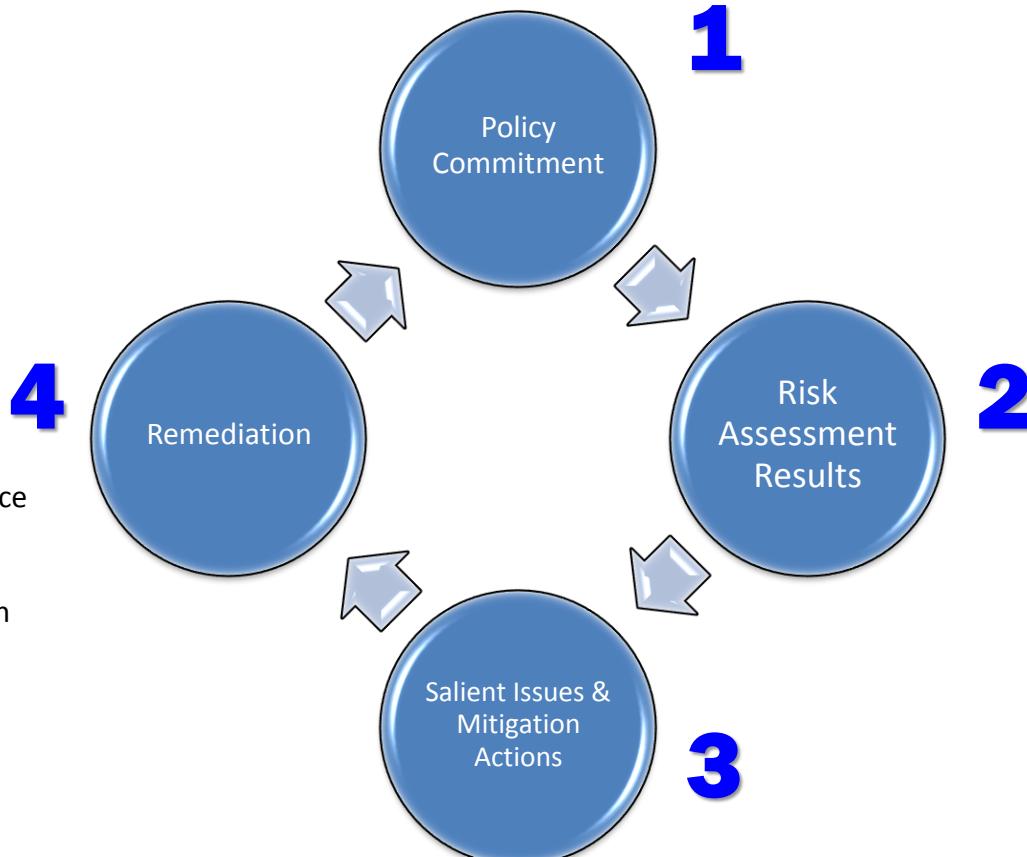
## Human Rights Due Diligence Process 2024

- 1 Policy Commitment
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# TCAP's Human Rights Pathform

As part of the process, on a 3 years basis, TCAP conducts human rights risk assessment which covers all our operations, subsidiaries, and supply chain. Relevant stakeholders include both internal (i.e. TCAP employees) and external (i.e. suppliers and community) as well as vulnerable groups (i.e. children, indigenous people, migrant labor) in our business activities and supply chain.

# Human Rights Due Diligence Process 2024



TCAP's Human Rights Due Diligence process has been developed in accordance with the UN Guiding Principles on Business and Human Rights ([UNGPs](#)).



# 1. Policy Commitment

According to the principles of good corporate governance, TCAP had committed to conducting business with responsibility to all stakeholders along the value chain. We recognizes that respect for human rights is an important responsibility associated with employees, customers, suppliers, and communities related to our business activities. Therefore, TCAP has established a human rights policy that conforms to key legal principles and international standards such as UNGP, etc.

The Policy applies to all operations of TCAP : Board of director, executives, and subsidiaries, as well as employees, customers, suppliers, and business partners. All have the responsibility to respect human rights and to comply with the laws and regulations governing the protection of human rights at the national and international levels. TCAP expected that all relevant stakeholders, as per mentioned, adhere to these human rights principles that are consistent with their own.

To promote compliance with the Human Rights Policy, TCAP has arranged communications to enhance knowledge, understanding, and awareness of human rights principles for employees on a regular basis to prevent human rights violations. The management guidelines cover all of stakeholders.

## 2. Human Rights Risk Assessment Results

### SCOPING

Scopes out the most relevant human rights issues through reviewing the identified risks within the geography of operation and peer benchmarking to determine risks. The actual or potential human rights issues that are covered in the process include, for example, working conditions, human trafficking, forced labour, child labour, freedom of associate, right to collective bargaining, discrimination, environmental issues and community rights, equal remuneration, and privacy, etc.

### IDENTIFICATION

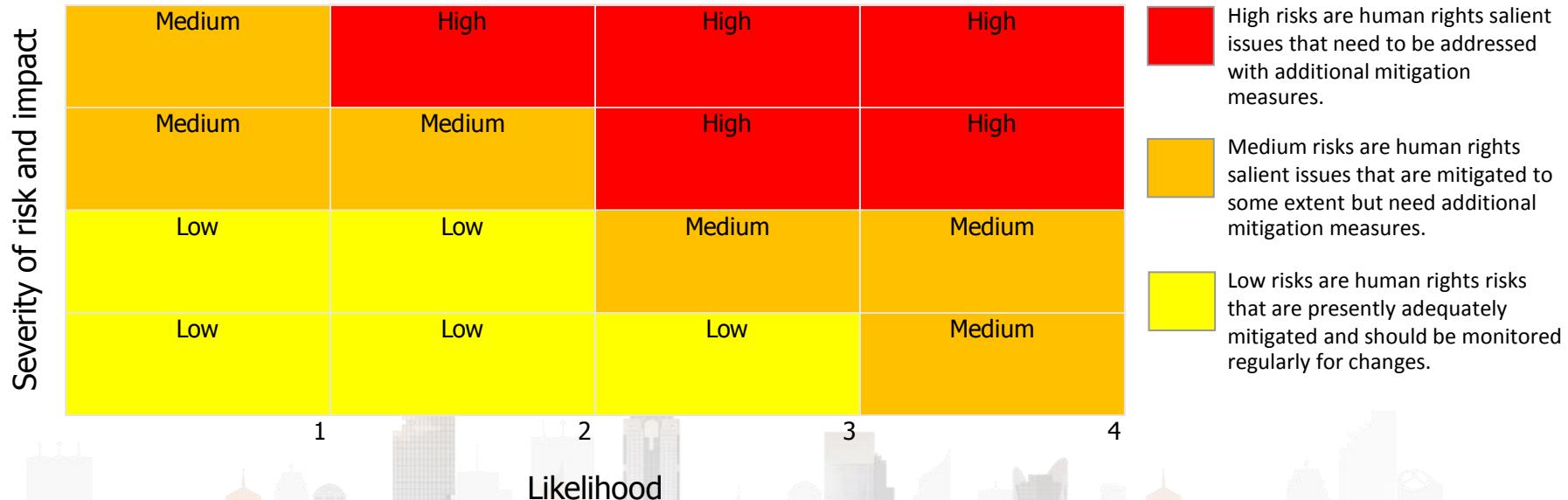
TCAP studies potential and actual human rights risks associated with its business activities based on the human rights issues identified from the scoping activity.

### PRIORITIZATION

Determines the level of severity and likelihood by using a 4x4 matrix. (detail next page).

# 2 Human Rights Risk Assessment Results (Con't)

## Human Rights Risk Assessment Matrix



### Notes:-

- 1 Assessment of the level of human rights risk was conducted by using a matrix above to determine the significance of the human rights issues based on likelihood and severity.
- 2 Human right issues that were ranked at high and medium levels will be considered as salient issues.

## 2. Human Rights Risk Assessment Results (Con't)

### Human Rights Risk Assessment Criteria : Severity

Level of severity	Scale (Seriousness of impact)	Scope (How many people are of will be affected)	Irremediable Nature (Difficulty of restore the impacted people to a situation before impact)
Critical (4)	Significant impact to health and safety: physical disability or fatality	Impact to all stakeholders in the group	Impossible to restore or will take longer than 5 years (>5 years) to restore the impact
High (3)	Moderate impact to health and safety: serious injury that needs rehabilitation (loss time injury)	Impact to most stakeholders in particular stakeholder group	Take 3-5 years to restore the impact
Medium (2)	Slight impact to health and safety: minor injury or illness (no loss time)	Impact to some stakeholders in particular stakeholder group	Take between 1-3 years to restore the impact
Low (1)	No impact to health and safety: first aid case	No negative impact to stakeholder	No need to remediate or take less than 1 year to restore the impact

#### Notes:-

A level of severity will be determined based on the scale, scope and irremediability of the risk or impact from the perspective of the affected stakeholders. Furthermore, level of severity is not an absolute value, but is relative to the other human rights risks and impacts that have been identified (UN Guiding Principle 14).

## 2. Human Rights Risk Assessment Results (Con't)

### Human Rights Risk Assessment Criteria : Likelihood

Likelihood Level	Likelihood
Very likely (4)	Such human rights issues have occurred consistently from the past until present.
Likely (3)	Such human rights issues have happened in the past and also occurred very often at the present.
Unlikely (2)	Such human rights issues have happened in the past and also occurred sometimes at the present depending on operation of business units.
Very unlikely (1)	Such human rights issues have never occurred in our business operation but have occurred in the industry of the operation.

#### Notes:-

For likelihood, it will be considered based on the local environment or context – the likelihood of a risk occurring is greater in a high-risk operating environment (UN Guiding Principle 19).

## 2. Human Rights Risk Assessment Results (Con't)

TCAP has identified 13 human rights issues relate to its operations and throughout the value chain.

### Customer

- 1 Data breaches and information misuse
- 2 Discrimination in Lending practice
- 3 Covid-19 Implication

### Employee

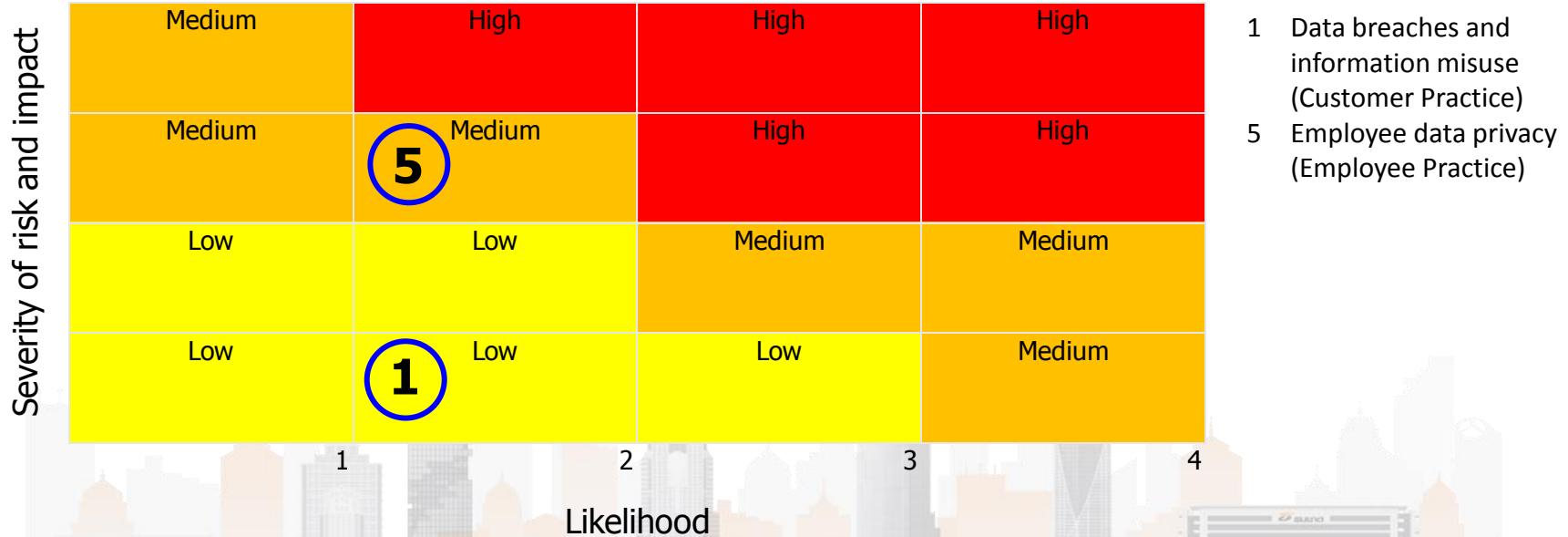
- 4 Potential discrimination in the hiring process
- 5 Employee data privacy
- 6 Health and safety due to communicable disease
- 7 Health and safety amid COVID-19
- 8 Freedom of association, assemble, and collective bargaining

### Suppliers

- 9 Potential Discrimination
- 10 Data and information leaks and breaches
- 11 Working Conditions: Health & Safety
- 12 Illegal form of labour
- 13 Labor rights, including modern slavery

### 3. Salient Issues and Mitigation Actions

TCAP identified **TWO** salient human right risk issues



### 3. Salient Issues and Mitigation Actions (Con't)

#### Customer Practice

##### Data breaches and information misuse

###### RISK

- Information misuse and inaccuracy
- Data leakage

###### Mitigation

- Disclosure policy Information security
- Cyber security strategy
- Access control password protection
- Encrypted files USB usage prevention
- Improve existing data leakage prevention tools that are used for detecting data transfers to external destinations

### 3. Salient Issues and Mitigation Actions (Con't)

## Employee Practice

### Employee data privacy

#### RISK

- Human rights violations especially, if sensitive financial information is disclosed
- Data leakage

#### Mitigation

- Disclosure policy Information security
- Cyber security strategy
- Access control password protection
- Encrypted files USB usage prevention
- Improve existing data leakage prevention tools that are used for detecting data transfers to external destinations
- Employee training

## 4. Remediation and Grievance Actions

TCAP has already provided complaint and channel for reporting from stakeholders who are affected violation of human rights. All incidents will be evaluated, record and manage via internal process with the strict confidentiality. Thus, the result will take the necessary steps to address the violation and impose appropriate disciplinary measures against the offending individual (s). In addition, the company has clearly established guidelines for the protection of stakeholders in filing a complaint or whistleblowing.

### Open **channels for reporting** human rights violation:-

- Directly report to Chairman of the Board of Director
- Directly report to Chairman of the Audit Committee
- Directly report to Managing Director
- Directly report to his/her supervisor
- TCAP website: <https://www.thanachart.co.th>

Details of whistleblowing and communication channels can be found in TCAP One Report 2024, page 106 – 107. (same channel with Anti-Corruption)

## 4. Remediation and Grievance Actions (Con't)

After implementing mitigation measures as well as monitoring and tracking human rights violation in 2024, TCAP had neither case of human rights violation, nor concerns or grievances related to human rights submitted. Consequently, there were no remediation action taken in any forms (i.e., publicly official apologies, financial or non-financial compensation, persuading the associated third party to remedy affected persons).

