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SUSTAIN

# HUMAN RIGHTS DUE DILIGENCE SUMMARY REPORT

Thanachart **Capital** Public Company Limited  
Year 2025



# **Comprehensive Human Rights Due Diligence Process**

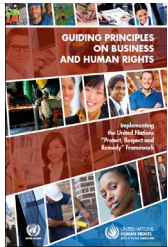
- 1 Policy and Commitment
- 2 Human Rights Risk Due Diligence Assessment
- 3 Salient Issues and Mitigation Actions
- 4 Remediation and Grievance Mechanisms

The Company adheres to the key principle of respecting human rights and treating all stakeholders with equality, equity, and non-discrimination. As a result, the Company has established a Human Rights Policy, guided by the underlying commitment that *"All human beings have equal rights and dignity."* The Company conducts a comprehensive Human Rights Due Diligence (HRDD) assessment every three years, covering all business units within the Company, its subsidiaries, and across its entire value chain. This encompasses both internal stakeholders—namely employees, executives, and directors—and external stakeholders, including business partners and communities, among others.





TCAP's Human Rights Due Diligence (HRDD) process has been developed in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGP).

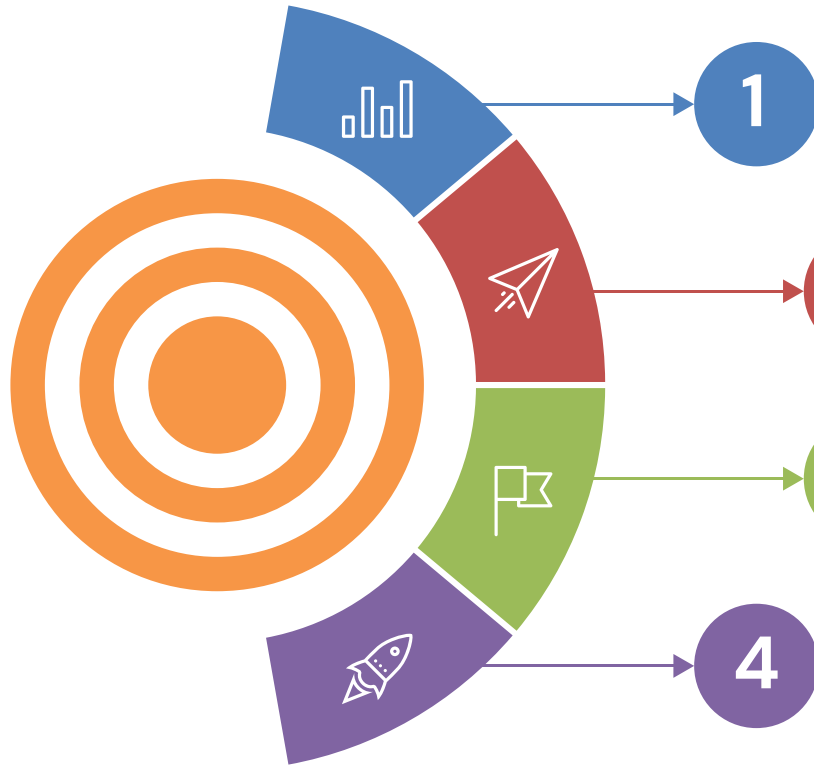


Adhering to the principles of Good Corporate Governance, the Company is committed to conducting its business operations with responsibility toward stakeholders throughout the value chain, while recognizing and respecting human rights of employees, customers, business partners, and communities. The Company's Human Rights Policy has been formulated in alignment with applicable laws and international standards, such as the United Nations Guiding Principles on Business and Human Rights (UNGPs), among others.

This Policy applies not only to all organizational units but also to the Board of Directors, executives, and Thanachart Group companies, as well as their respective employees, customers, business partners, and strategic allies. Every individual has a responsibility to respect human rights and comply with national and international laws and regulations governing human rights protection. The Company expects all relevant stakeholders to uphold human rights principles that align with the Company's commitments stated above.

To foster compliance with the Human Rights Policy, the Company regularly communicates with employees to enhance their knowledge, understanding, and awareness of human rights principles as a proactive measure against human rights violations. Concurrently, the Company integrates these issues into a comprehensive management approach that encompasses all stakeholder groups.

## 2. Human Rights Risk Assessment



### Identify Human Rights Risks

- Identify and map potential human rights risks.
- Identify potentially affected stakeholder groups, such as customers, business partners, communities, or employees.

### Inherent Risk Assessment

- Assess potential human rights risk prior to implementation of control measures.
- Identify potentially affected parties, such as customers, business partners, society, or employees.

### Establish Control Measures and Risk Management Plans

Identify existing control measures and approaches, such as policies, grievance mechanisms, as well as impact mitigation and remediation frameworks.

### Residual Risk Assessment

Conduct a human rights risk assessment after implementation of control measures. If the residual risk level remains high, additional mitigation measures must be established beyond those already in place.

## Human Rights Risk Assessment Methodology

The Company assesses high-risk human rights issues by using the United Nations Guiding Principles Reporting Framework. The impact assessment is conducted based on the following factors:-

- Severity of impact, which encompasses three criteria:
  - Scale: gravity of the impact
  - Scope: number of individuals affected
  - Remediability: the ease with which the situation can be remedied
- Probability of occurrence, taking into consideration the likelihood and frequency of potential human rights impacts.



## Human Rights Risk Matrix

|                             |        |            |        |        |   |
|-----------------------------|--------|------------|--------|--------|---|
| Severity of risk and impact | Medium | High       | High   | High   |   |
|                             | Medium | Medium     | High   | High   |   |
|                             | Low    | Medium     | Medium | Medium |   |
|                             | Low    | Low        | Low    | Medium |   |
|                             |        | 1          | 2      | 3      | 4 |
|                             |        | Likelihood |        |        |   |

- High risks are human rights salient issues that need to be addressed with additional mitigation measures.
- Medium risks are human rights salient issues that are mitigated to some extent but need additional mitigation measures.
- Low risks are human rights risks that are presently adequately mitigated and should be monitored regularly for changes.

**Notes:-**

- 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.
- Human right issues that were ranked at high and medium levels will be considered as salient issues.



There are nine human rights issues relevant to the Company's operations and across its value chain, as follows:-

### Customers

- 1 [Data breaches and misuse](#)
- 2 Discriminatory practices in credit granting (Debt Restructuring)

### Employees

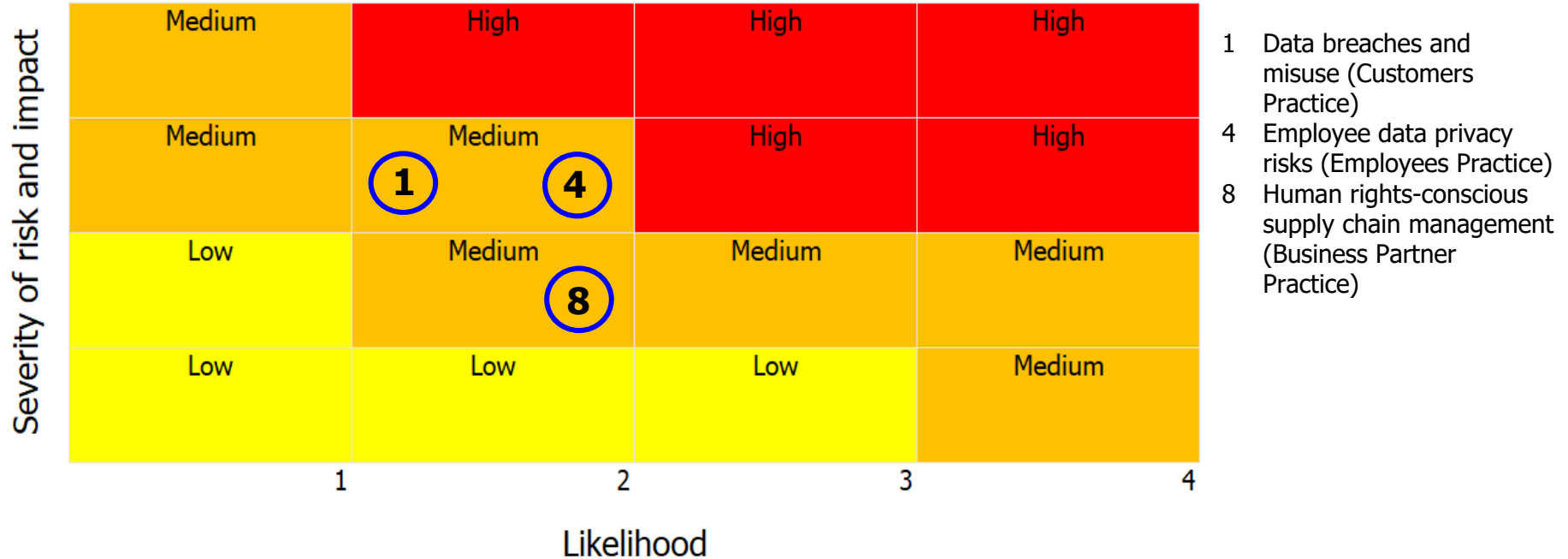
- 3 Discriminatory practices in the hiring process
- 4 [Employee data privacy risks](#)
- 5 Occupational health and safety management to prevent the transmission of communicable diseases

### Business Partners

- 6 Potential discriminatory practices
- 7 Personal data breaches and compromises of business partners' information
- 8 [Human rights-conscious supply chain management](#)
- 9 Forms of illegal labor practices

### 3. Salient Issues and Mitigation Actions

The Company has identified three salient human rights risk issues, as follows:-



### 3. Salient Issues and Mitigation Actions (Continued)

Customers Practice

Data breaches and misuse

#### Risk

- Information misuse and inaccuracy
- Data leakage



#### Mitigation

- Formulate Information security policies
- Establish cyber security strategic plans
- Access control password protection
- Encrypted files USB usage prevention
- Upgrade existing Data Loss Prevention (DLP) tools for detecting data transfers to external destinations

### 3. Salient Issues and Mitigation Actions (Continued)

Employees Practice

Employees data privacy risks

#### Risk

- This constitutes a material issue if financial information, which is sensitive personal data, is disclosed
- Data breaches



#### Mitigation

- Formulate Information security policies
- Establish cyber security strategic plans
- Access control password protection
- Encrypted files USB usage prevention
- Upgrade existing Data Loss Prevention (DLP) tools for detecting data transfers to external destinations
- Implement employee training as a proactive measure to ensure awareness, understanding, and compliant practices regarding personal data security

### 3. Salient Issues and Mitigation Actions (Continued)

Business Partners Practice

Human rights-conscious supply chain management

#### Risk

- Human rights violations committed by business partners, such as the use of child labor, violence, and harassment, etc.

#### Mitigation

- Establish human rights compliance as a condition for the procurement and screening processes with the Company's business partners, such as employment and labor practices that conform to human rights policies under relevant laws, regulations, or requirements
- Encourage business partners to respect diversity and individual differences, and require that they do not support or tolerate any violence and harassment

## 4. Remediation and Grievance Mechanisms

The Company has established grievance and whistleblowing channels for stakeholders affected by human rights violations. Every reported issue will be assessed, logged, and handled through internal procedures under strict confidentiality.

Subsequent findings will be processed through necessary steps to rectify violations and implement appropriate disciplinary measures against violators. The Company has also established clear guidelines to protect stakeholders who report grievances or blow the whistle.

### Grievance and Whistleblowing Channels:-

- Via the website [www.thanachart.co.th](http://www.thanachart.co.th) under the "Anti-Corruption Whistleblowing" section
- Directly to the CEO and President
- Directly to the Head of the Internal Audit Unit via email: [Anticorruption@thanachart.co.th](mailto:Anticorruption@thanachart.co.th)
- Directly to the immediate supervisor. In the event that the matter involves a senior executive or director of the Company, the disclosure must be submitted directly to the Chairman of the Audit Committee

Details regarding whistleblowing procedures and communication channels can be found on Pages 105-106 of the 2025 Annual Report (the channels are identical to those used for corporate grievances or whistleblowing).

## 4. Remediation and Grievance Mechanisms (Continued)

"In this regard, the Company has implemented the mitigation measures, including continuous monitoring and surveillance of human rights issues. *In 2025, the Company found no instances of human rights violations, concerns, or grievances related to human rights.* As a result, no remedial actions of any form were undertaken (such as formal public apologies, financial or non-financial compensation, or encouraging relevant third parties to provide remediation to affected individuals)."

