

## **Thaioil Public Company Limited**

Human Rights Due Diligence Process and Human Rights Impact Assessments and Management (HRIAM) Report 2020 Our
Commitment &
Strategy

CHALLENGES, RISKS, AND IMPACTS
Thaioil Group Commitment
Thaioil Group Human Rights Journey and 5 years Roadmap

Our Policy Thaioil Group Human Rights Policy in Workplace (revision2)
Thaioil Group Human Rights Working Team
Thaioil Group Business and Human Rights Policy for Supply Chain (revision2)
Business Partners Code of Conducts-Business and Human Rights Policy (revision2)
TOP Group Privacy Policy
Privacy Data Policy

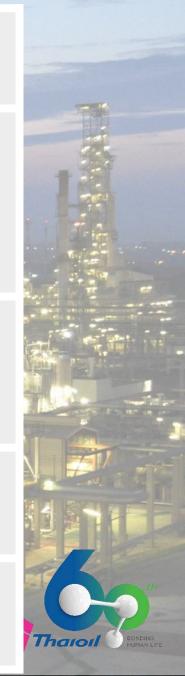
Our Procedure Human Rights Impact Assessments and Management Procedure Grievance Mechanisms and Effective Remedy Framework Procedure Fitness for Work and Return to Work Procedure

Our Salient human rights issues

Human Rights Due Diligence Process Human Rights Risks Assessment

**Spotlight on issues** 

Spotlight on Human Right Mindset Spotlight on COVID-19



## **CHALLENGES, RISKS, AND IMPACTS**

Since the United Nations declared the Universal Declaration on Human Rights 70 years ago, the global community has witnessed various developments in the human rights space drive towards a "universal" human rights framework. In 2017, the Thai government announced a commitment to put human rights at the forefront of the national agenda, and proceeded to develop the 4th National Human Rights Plan of Thailand and the National Action Plan on Business and Human Rights. The first phase of the National Action Plan on Business and Human Rights for 2019-2021 was then published in 2019 to further efforts in enacting national human rights policy. While facing this context, the Company is also confronted with the various human rights risks of our investment in the Clean Fuel Project - a large-scale investment initiative that depends on a large workforce and involves high volumes of transportation to deliver equipment and machines over the 4 - 5 years of construction - in combination with the ongoing COVID-19 pandemic in 2020. The Company must take special care to prevent potential human rights violations, such as employment of illegal forms of labour or labour practices that are not in compliance with the law, non-compliance in employment or treatment of migrant labour, impacts on communities from our construction activities, impacts on communities from our operations during the COVID-19 pandemic, as well as impacts on the safety and welfare of our employees - a key stakeholder group of the organization. In light of the aforementioned context and factors, Thaioil has enhanced our measures to protect the human rights of our stakeholders and prevent adverse impacts from our business activities.





## **Our Commitment**

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Thaioil Group remains committed to promoting good human rights practices throughout our value chain. We continue to operate as mandated by the Human Rights Policy in Own Operations, the Business and Human Rights Policy for Business Partners, and the Supplier Code of Conduct. All our human rights-related policies and procedures have been aligned with the UN Guiding Principles on Business and Human Rights, or the UNGP, which guide us towards the protection of the human rights of our employees, business partners (i.e. suppliers, contractors, customers), and local communities, as well as environmental rights relating to natural resources, fisheries, and a clean environment free of pollution. We uphold our commitment to ensure that our treatment of all stakeholders throughout our value chain go above and beyond expected human rights standards, such that Thaioil may be looked to as a leading practice on sustainability management in both Thailand and abroad.

Thaioil Group made some improvements to the "Grievance Mechanisms and Effective Remedy Framework Procedure" previously in 2019. We had developed this procedure to guide management of the grievances and complaints submitted regarding the practices of Thaioil Group and our value chain, reduce social risks in the business, transmit the worries and concerns of stakeholders, and mitigate existing conflicts. The procedure also demonstrates transparency in Thaioil's business conduct, and promotes good relations with business partners in our supply chain. In 2020, Thaioil Group established a target to achieve zero human rights complaints.

## **Our Strategy**

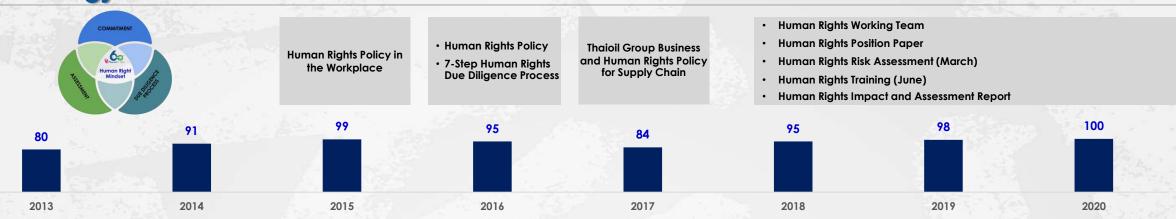
To deploy human right policy to practice and actions related to human right according to the roadmap with systematic and beyond best practice.

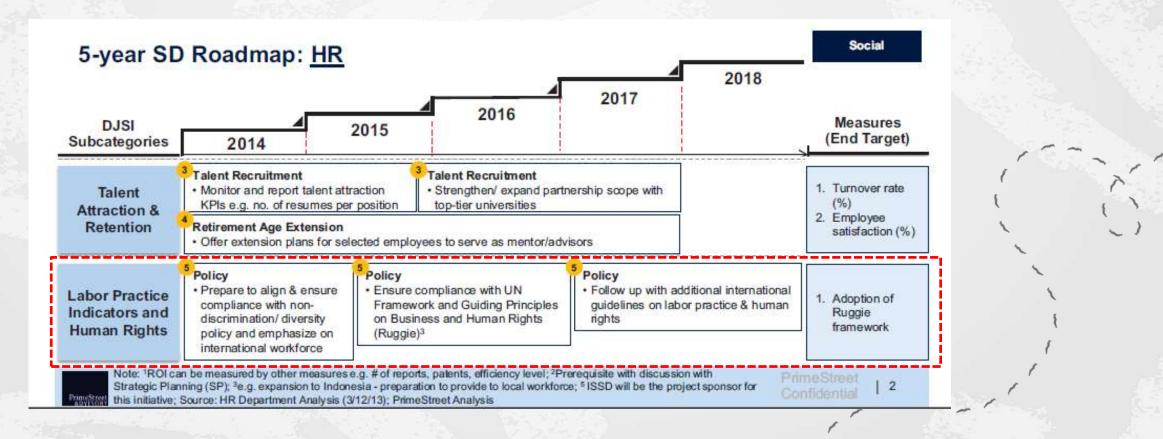




## **Our Strategy**

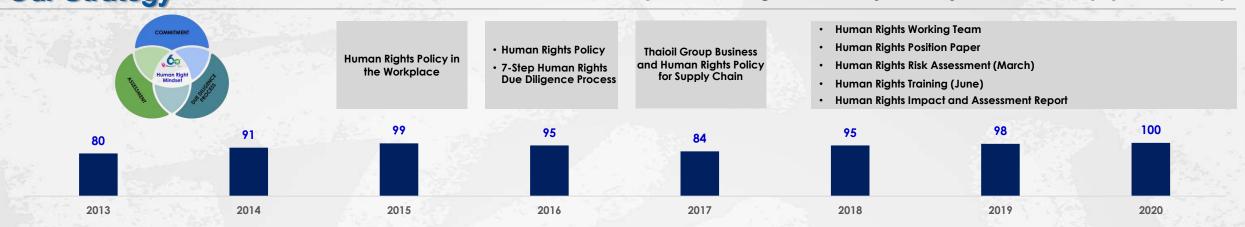
## Thaioil Group Human Rights Journey and 5 years Roadmap (2014–2018)



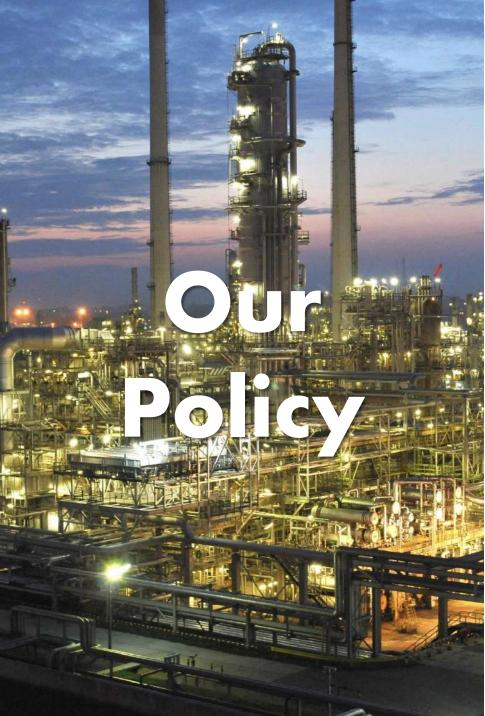


## **Our Strategy**

## Thaioil Group Human Rights Journey and 5 years Roadmap (2021–2025)



2021	2022	2023	2024	2025	Social Measures					
1. Align & ensure compliance with Rights (NAP) phase 1 (แผนปฏิบัติ 2565)	<ul><li>Adoption of Ruggie framework</li><li>Adoption of Thailand NAP</li></ul>									
2. Adopt the best practice of global companies applying human rights global standard.	2. Monitor and adopt market Also, evaluate and compe	Human rights Maturity Level of								
Follow up with additional international guideline on Human Rights.	3. Put in place effective remedy and grievance mechanisms.	3. Monitor and rep	ort remedy and grievan	ce mechanisms performance.	<ul><li>Thaioil. 'Best Class level'</li><li>No complaint on human rights</li><li>Completed &amp; Updated Human</li></ul>					
4. Incorporate Human right policy throughout Thaioil affiliates.	4. Deploy Thaioil human rigi Also, Monitor and report T	s in phasing.	Rights Procedure  • Human Rights Award (รางวัล องค์กรตันแบบด้านสิทธิมนุษยชน)							
5. Ensure the protection of migrant rights and ethical recruitment practices.	t rights and ethical									
6. Develop Thaioil Human Rights m		Human Rights Mindset								



#### **Our Thaioil Group Human Rights Policy**

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#### **Empower Human Life through Sustainable Energy and Chemicals**

The commitment of the Thaioil Group to respect human rights in the workplace and all areas in which the Thaioil Group operates business Appear clearly in the business path of Thaioil Group Operational system that strives for excellence Including business practices and ethics of Thaioil Group Thaioil Group announced the use of human rights in 2015 to demonstrate its commitment. Thaioil Group believes that although the state has an important duty to protect and supervise human rights compliance, Thaioil Group always considers that we have the duty and responsibility to perform and respect human rights. Also And also plays an important role in driving "Thaioil Value Chain" Respect and follow human rights. For this reason Thaioil Group therefore operates its business with the intention and determination by strictly adhering to the principles of international human rights organizations. Including United Nations Universal Declaration of Human Rights: UNUDHR, United Nations Framework and Guiding Principles on Business and Human Rights (Ruggie Framework), The Universal Declaration of Human Rights,

The International Covenant on Civil and Political Rights, The International Covenant on Economic, Social and Cultural Rights IIa: The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work

In many areas of business operations of the Thaioil Group. We find that social problems are part of a broad and complex problem group, both socially and economically and security. Which may affect the business of Thaioil Group in many aspects Which is part of the establishment of the "Thaioil Value Chain" for comprehensive human rights management in all dimensions.

## **UN Guiding Principle and Thaioil Value Chain**



#### **DJSI Human Rights INDICATORS**

### THREE PILLARS of the UN GUIDING PRINCIPLES



Vision (Values) -Charter of Corporate Responsibility

-Code of Ethics

-Code of Sustainable Conduct

**Policies &** Standard

-Business Human Rights Policies, HR, Security, Material Stewardship and Supply Chain Policies -HSE and Community Management Standards

**Implementation** 

-Due diligence: Identify potential impacts and risks via Human Rights assessment, Social Impact Assessment and other Tools of Risk Evaluation

-Mitigation and Management Plans as needed

**Training** 

-Culture Awareness

-Leadership Training

-Orientation and onboarding

-Internal: HRIAMs System -External: DJSI, SD report

Thaioil aims for sustainable growth and long-term persistence, operational excellence, as well as a focus on economic development coupled with social responsibility and environmental protection to create values for all stakeholders."

The human rights issues related to the vulnerable groups covers all Stakeholders and value chain.

The Human Rights Protection of **Vulnerable Groups**;

- 1) women and girls;
- 2) children;
- 3) refugees;
- 4) internally displaced persons;
- 5) stateless persons;
- 6) national minorities;

- 7) indigenous peoples
- 8) migrant workers;
- 9) disabled persons; 10) elderly persons;
- 11) HIV positive persons and AIDS victims;
- 12) Roma/Gypsies/Sinti; and
- 13) lesbian, gay and transgender people.

#### **Thaioil Value Chain**

Employee and Contractors	Safety, Security and Environment	Social and Communities	Suppliers and Sub-contractors	Customer and Consumer
PM	QM & CA	CA	PC	CM & TR
Labour Right - Working conditions - Anti-Slavery and Human Trafficking	Safety, Security and Environment - Safty & Security	Community Right  - Standards of	Supplier engagement & code of conduct	Customer Right
Policy - Freedom of association and collective bargaining - Forced and compulsory - Equal pay policy - Child labor, - Non-Discrimination and Anti-Harassment Policy - Safety and Health at Work Policy	management, - Security Training, - Warter security, - Impact of pollution, - Waste and hazardous materials management,	- Standards of living and quality of life, - Community health and safety, - Community engagement, - Cutural heritage, - Minorities including indigenous peoples, - Resettlement	Compliance with TOP Group Business and Human Rights Policy for Stakeholder (TOP) and Supplier Code (14 +17 issues)	- Consumer Health and Safety, - Data Privacy, - Access to energy

**Existing control level by stakeholders** 

**Monitoring & Reporting** 

## **TOP Group Human Rights Policy, and Action in 2018-2021**



### Action in 2015 – 2017

#### 2015 Thaioil GROUP Human Rights Policy in Own Operation

#### เคร็อไทยอยอล์ หนังสือเรียนที่ 1382568

ถึง หล้างานทุกคน

จาก ประชานเจ้าหน้าที่เชินระเละราชนการนัจโดรรถใหญ่

. 125 Arvan 25

#### เรื่อง นโยบายด้านสิทธิมนุษยชนในสถานที่ทำงาน

เข้าเมืองการเก็บสถุนในการปฏิบัติการเล่าถึงกัน จุดการและเก็ตอุดทำไหการเก็บและเก็ตจังกัน ราชฐานของการที่สามากับการบุคคน โดยทำเราานอุดหนึ่งเป็นทั้งใช้การปู้แกรกที่ผมของเมื่อ และร้าง แต่ทำเห็นให้การที่สามากับการปลามากับการและเกาะที่สามากระบานเกราะที่สามากับการปฏิบัติการเก็บและรู้นี้ ตัวได้สามเก็บสุดหนดการท่างการปลามากระบานและการปลามากับการที่สามากับการปลามากับการ ความทาง ได้เก็บสุดเปลามากับการปลามากระบานและการปลามากับการที่สามากับการปลามากับการบาน สามากระบาน เพื่อในของเรียกเป็นตามากับสำเหลา

บริษัท จึงเจ็าเกลื่อให้หรักทบใบเครื่อไทยของสากหลับจาบเมอรื่อบริเติโดยเครเหร็ด



ประชานเจ้าหน้าที่เสียวะเลยาสมารถู้จัดการในเ

#### นโยบายด้านสิทธิมนุษยชนในสถานที่ทำงาน

#### 1.วรบว่ายการต่าเน็นงาน

สิทธิบบุษยยมนี เป็นทิจใช้เลี้มฐานและเกิรากที่บุคคลันนี บุคคลันที่โครยมคุณนี เลือนบุคย ตอบหนุได้กับแรกเรียบกานระยุกกับเรียโดยของดี ลักที่เลิตโกระบุคคลมเต่าลัดถึงพระแคน ถือโดยใน หรือบางธรรมชาติ ก่อน จริงกรรณีว่า ที่ติน ปาใน้นและเลิตโกรจังงานโกรเต่าน่วน คอดจาเล็กแต่เลิยเป็น เพราะเกิรเต่

หรือโทยธอบดีสาเพลิทธิมนุษยาขนายผู้ถือหมได้ขวมเลือ ตละคามสำนักเกิดเมนะที่จรึ่งทำเลือน ที่เลี้ยวกระที่การเมื่อใหญ่ของแต่งการสิบที่สามารถเกิดเพลิทธิมนุษยามะทำแล้งสุด ที่แล้วเราเทียวกระที่สามารถแล้วเราเทียวกระทำเกลิทธิมน์เลียวกระที่สามารถเกิดเหลือนกระที่เลี้ยวกระที่สามารถเกิดเ

# 2016 Thaioil GROUP Business and Human Rights Policy for Stakeholder and Stakeholder Code – for Thaioil GROUP Business and Human Rights Policy

#### เครือไทยของต์ หนังสือเรือนที่ 71/2550

to see

ราย ประชานสำหน้าที่เกิดาและประเทศผู้ตอกเกิดอุ.

รับที่ 28 พระบาทน 2559

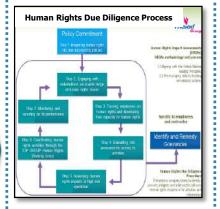
#### เรื่อง นโยบายด้านธุรกิจและสิทธิมนุษยชน สำหรับคู่ค้า

เพื่อเป็นการเป็นคุณในการที่รู้เกียวและตัวสิตรัฐอาการ ที่เลื่อ ปังตัวขึ้นที่สรูกและ เลือกเพื่องของ ที่เลี้ (พุทธโลกัสสายสายและได้สายสาย สายสาย ได้ประทับสาย ที่ ที่สาย ได้เลือกสิตรัฐสาย บุคคอบทำเกิดสายสาย เกิดสามารถสาย ปี เลือง หรืองาว น้ำ ที่สาย เกิดสาย และสำนารถ และครสังเพลิดแก้วิธีแกรก เป็นตั้ง เครื่องและคริ่งสิตรัฐสาย เกิดสายเลือก และสาย บุคคล โดเล็กเลือกสาย ผู้ทำ ผู้สิตรัฐสาย เกิดสาย เป็นต้องสายสาย เกิดสาย เกิดสาย เกิดสาย เกิดสาย เกิดสาย เกิดสาย ปุคคล โดเล็กเลือกสาย เกิดสาย เกิดสาย เกิดสาย เป็นต้องสาย เกิดสาย เกิดสาย เกิดสาย เกิดสาย เกิดสาย เกิดสาย เกิดสาย ปุคคล โดเล็กเลือกสาย เกิดสาย ปุคคล เกิดสาย เกิด

#### หลักปฏิบัติสำหรับคู่ค้า ด้านนโยบายธรกิจและสิทธิมนษยชน

t. Terminense

#### 2016 TOP GROUP Human Rights Due Diligence Process (risk assessment & HRIAM)

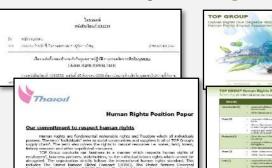


## Human Rights Risk Assessment focus in Employee and Contractor



#### **Action in 2018-2021**

- Thaioil Human Rights Risk Criteria and Workshop for Human Rights Risk Assessment
- 2. Thaioil Value Chain
- 3. Thaioil Group Human Rights Working Team
- 4. Thaioil Group Human Rights Position Paper
- Human Rights Impact Assessments and Management (HRIAM) Report 2018 - 2020
- 6. Thaioil Human Rights Training via Micro Learning for all employee





- 7. Add Human right criteria for TOP contractor yearly contract evaluation.
- 8. Incorporate Human right policy through TOP group supply chain
- 9. Develop
  - Our TOP GROUP Human Rights Policy,
  - Thaioil Group Human Rights Management System Procedure and
  - Grievance mechanisms and effective Remedy Framework Procedure and Fitness for Work and Return to Work Procedure
- 10. 2021 Thaioil GROUP Human Rights Policy in Workplace (revision2)
- 1. 2021 Thaioil GROUP Business and Human Rights Policy for Supply Chain Business Partners Code of Conducts-Business and Human Rights Policy (revision2)

Thaioil and Subsidiaries respect the rights of employees and stakeholders without discrimination against their perspectives, races, skin colours, religions, disabilities, birth origin, genetic information, genders, pregnancy, age, sexual orientation, gender identity, gender expression, marital status, nationalities, or other statuses considered as human rights. Thaioil and Subsidiaries will utilize the reasonable and comprehensive practices of human rights justice to all business operations, focusing on disposing the injustice, discrimination, threatening, and other forms of rights violations.

- 2.1 Thaioil and Subsidiaries' employees in all levels, must have clear and thorough understandings about relevant laws associated with work and direct responsibilities, and strictly follow them. Should the employees be uncertain of practices, it is advised to consult the law office and must not act without instruction.
- 2.2 Thaioil and Subsidiaries comply and categorize laws, rules and regulation for employees to study, and appropriately and adequately educate employees on the relevant laws and regulations.
- 2.3 Thaioil and Subsidiaries must strictly follow the international human rights, educate employees on the international human rights so that they are able to apply with their work, and must not support any business which violates the international human rights standard.
- 2.4 Employees who are assigned to operate abroad should study about laws, cultures and traditions of the destinated country prior to travelling, to ensure that products, product samples, brought equipment and travel document as well as travelling purpose and operation are legal and do not go against cultures and traditions of the destinated country.



Under the Universal Declaration of Human Rights with due regard for human dignity, rights and freedom, and equality, Thaioil and Subsidiaries refrain from improper actions and strictly discourage violation of human rights' principles by diligently examining any involvement in such violation, through the following practices;

- 1) Thaioil and Subsidiaries strictly monitor the Universal Declaration of Human Rights at national and international levels, including the constraints posed by labor laws in each country where a business operates, by instituting workplaces that are safe, internationally-standardized hygienic, and narcotics-free. Thaioil and Subsidiaries treat all employees equally; do not discriminate due to the similarity or difference of birth origin, gender, age, skin color, race, nationality, religion, belief, political view, disability, family background, or any other status unrelated to business operation. Thaioil and Subsidiaries also respect individual rights and freedom, and protect personal data.
- 2) Thaioil and Subsidiaries must actively ensure that the business operation does not involve with the violation of human rights, and that it participates and adopts guidelines helpful to world society, including United Nations' human rights principles.
- 3) Thaioil and Subsidiaries must educate the employees on human rights' principles in order to apply with their operation, and must not support business and/ or activities violating international human rights."

With the aforementioned policies and practices, the essential composition of products and services are the commitment to respecting human rights and human rights in the workplace of Thaioil and Subsidiaries. Thaioil and Subsidiaries' system is aimed to ensure that every staff is treated with respect and dignity, on the basis of human rights, human rights in the workplace policy and code of conduct of Thaioil and Subsidiaries' stakeholders.

Business Partners Code of Conducts

Business and Human Rights Policy (revision2)

Thaioil and Subsidiaries' Business Partners
Code of Conducts ("the Code") defines the nonnegotiable minimum standards that the Company
asks the business partners to respect and adhere
to when conducting business with Thaioil and
Subsidiaries. This policy helps continue the
compliance with international standards such as
the UN Guiding Principles on Business and Human
Rights, the Core Conventions of the International
Labour Organisation (ILO), the 10 Principles of the
United Nations Global Compact, and further the
Company's operations.







## Circular Letter No. 146/2563 Privacy Policy for Thai Oil Public Company Limited and Its Affiliates

Thai Oil Public Company Limited and its affiliates in which Thai Oil directly or indirectly holds more than 50% share capital (collectively referred to as "TOP") respects the right to privacy and values importance to the protection of Personal Data in connection with or in conducting transactions with TOP. Therefore, this privacy policy is prepared to provide governing criteria, mechanisms, measures and governance for managing Personal Data as follows:

#### 1. Scope of this Privacy Policy

This Privacy Policy applies to all employees which includes permanent employees, employees with definite contract period, temporary workers and contractors including Data Processor who processes Personal Data on behalf of TOP.

#### 2. Definition

- 2.1. "Personal Data" means data about a person that can directly or indirectly identify such person but does not include data of a deceased person in particular
- 2.2. "Sensitive Personal Data" means data that is a truly personal matter but is sensitive and may risk unfair discrimination such as race, ethnicity, political views, creed, religion or philosophy behavior, sexual behavior, criminal history, health data, disability, labor union data, genetic data, biological data or any other data that affects the Data Subject in the same way as prescribed by the Personal Data Protection Committee
  - 2.3. "Processing" means actions relating to the collection, use, disclosure, deletion or destruction of Personal Data
  - 2.4. "Data Subject" means natural person who is the owner of the Personal Data and such Personal Data is directly or indirectly identifiable to such person
  - 2.5. "Data Controller" means person or juristic person having the authority to make decision about the collection, use, or disclosure of Personal Data
- 2.6. "Data Processor" means person or juristic person undertaking the collection, use or disclosure of Personal Data in accordance with an order or on behalf of TOP. Thus, this person or juristic person is not a Data Controller

#### 3. Collection of Personal Data

- 3.1. TOP will collect Personal Data with purposes, scope and apply lawful and fair methods. The collection will be done only as necessary for the business objectives of TOP.
- 3.2. In the case of collection of Sensitive Personal Data, TOP will ensure that the Data Subject acknowledges and give consent to such collection via electronic method or other methods. TOP will explicitly request for consent from the Data Subject prior to the collection of Sensitive Personal Data unless such collection of Personal Data and Sensitive Personal Data falls under an exception provided under the Personal Data Protection Act B.E.2562 or other laws.

### **Our Procedure**

Thaioil GROUP Human Rights Policy applies to every employee and officer in every Thaioil Group wholly owned entity, and in joint ventures (JVs) to the extent possible and reasonable given Thaioil's level of participation. In situations where Thaioil does not have overall control of a JV, we will do everything we reasonably can to make sure JVs and JV partners follow similar principles.

Thaioil and Subsidiaries shall record and report internally all legitimate adverse human rights impacts, in line with Thaioil Group Human Rights Policies. And Thaioil report annually to stakeholders on the implementation of Thaioil Group Human Rights Policies.

### Thaioil GROUP Human Rights Working Team

The 2nd meeting of the Executive Committee on Corporate Human Resource Management (COM B), held on February 20, 2018, approved the appointment of a TOP GROUP Human Rights working Team to manage and support the implementation of the Human Rights Policy, to oversee and support the implementation of human rights principles. Adhering to the principles of universal human rights organizations. The United Nations Global Compact (UNGC), the United Nations Universal Declaration of Human Rights (UNUDHR) and the United Nations Framework Convention on the Rights of the Child (Ruggie Framework)



## **Human Rights Impact Assessments and Management Procedure**





#### Thaioil Group Human Rights Impact Assessment and

#### Management Procedure

(แนวปฏิบัติการประเมินและจัดการผลกระทบ ด้านสิทธิมนุษยชนกลุ่มไทยออยล์)

FOR

THAI OIL PUBLIC COMPANY LIMITED
AU UDOM, SRIRACHA, CHOLBURI
THAILAND

THIS DOCUMENT IS ISSUED UNDER THE AUTHORITY OF

.....

(CHIRAPORN KAMON-IN)

MANAGER - INDUSTRIAL/EMPLOYEE RELATIONS



Document	Thaioil Group Human Rights Impact Assessment and					
	Management Procedure					
Document type	PDF / Online					
Note	Originally in Thai					

#### Summary:

This document outlines Thaioil Group Human Rights Impact Assessment and Management Procedure. The document is publicly disclosed in the URLs:

https://www.thaioilgroup.com/upload/content\_file/ 202107020803\_ThaioilGroupHumanRightsImpactAssessmentandManagem entProcedure\_TH.pdf

The content of the document includes;

- Thaioil's Human Rights Framework (pdf page 4-5)
- Human Rights Management for Thaioil's External Stakeholders and Voluntary Commitment (pdf page 5-6)
- Compliance and Government Supports (pdf page 7)
- Human Rights Implementation (pdf page 7-18)
  - Human Rights Commitment (pdf page 7-8)
  - Governance Structure related to human rights management in Corporate Level and Operational Level (pdf page 8-10)
- Human Rights Impact Management Procedure covering 7 steps of Human Rights
   Due Diligence (pdf page 10-18)

## **Grievance Mechanisms and Effective Remedy Framework Procedure**



**QSHE** 

## REMEDY FRAMEWORK PROCEDURE

(summary version)

(แนวปฏิบัติกระบวนการบ่งขึ้และการจัดการข้อร้องเรียน-ร้องทุกข์เพื่อการเยียวยา)

#### FOR

THAI OIL PUBLIC COMPANY LIMITED
TUNGSUKHLA, SRIRACHA, CHOLBURI
THAILAND

THIS DOCUMENT IS ISSUED UNDER THE AUTHORITY OF

(CHIRAPORN KAMON-IN)

MANAGER-INDUSTRIAL/EMPLOYEE RELATIONS





Document	Grievance Mechanisms and Effective Remedy						
	Framework Procedure						
Document type	PDF / Online						
Note	Originally in Thai						

#### Summary:

This document outlines Thaioil Group Grievance Mechanisms and Effective Remedy Framework Procedure. The document is publicly disclosed in the URLs:

https://www.thaioilgroup.com/upload/content\_file/

202106291600 202011131654 GrievancemechanismsandeffectiveRemedyFrameworkPROCE DURE20201.pdf

The content of the document includes;

- Responsibility and department in charge (pdf page 5)
- Whistle Blowing Procedure(pdf page 6-9)
- Grievance Mechanisms Guideline covering whistle blower protection (pdf page 10-11)
- Remedy Procedure and Continual Improvement (pdf page 12-15)



### Fitness for Work and Return to Work Procedure





## FITNESS FOR WORK AND RETURN TO WORK PROCEDURE

FOR

THAI OIL PUBLIC COMPANY LIMITED
TUNGSUKLA, SRIRACHA, CHOLBURI
THAILAND

THIS DOCUMENT IS ISSUED UNDER THE AUTHORITY OF

.....

(ARPAKORN WONGSATHAPORNPAT)

MANAGER - HR SERVICES





Document	Fitness for Work and Return to Work Procedure
Document type	PDF / Online
Note	Originally in Thai

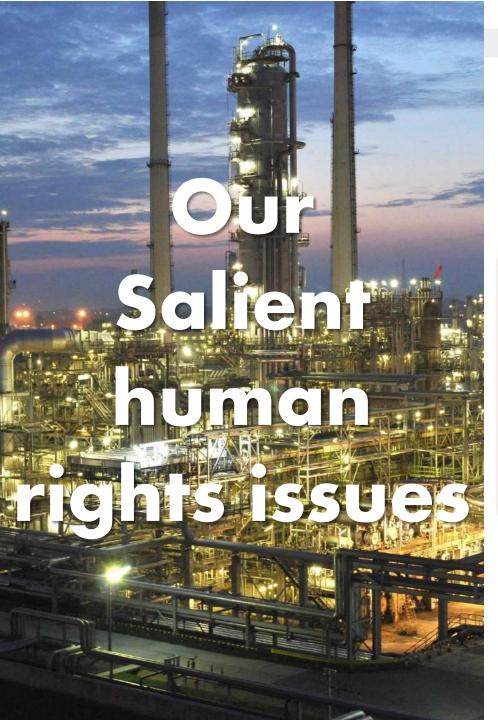
#### Summary:

This document outlines Thaioil Group Fitness for Work and Return to Work Procedure. It is a practice that sets guidelines for remediation for sick employees, pregnant employees and employees who are unable to perform the job description agreed with the company.

The content of the document includes;

- Responsibility and department in charge (pdf page 3-4)
- Remedy Procedure and Continual Improvement for sick employees, pregnant employees and employees who are unable to perform the job description agreed with the company (pdf page 4-7)

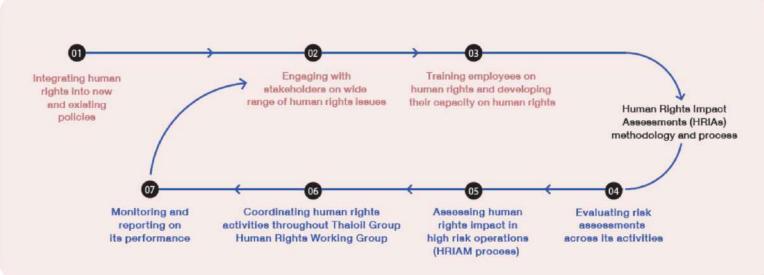




## Our Salient human rights issues

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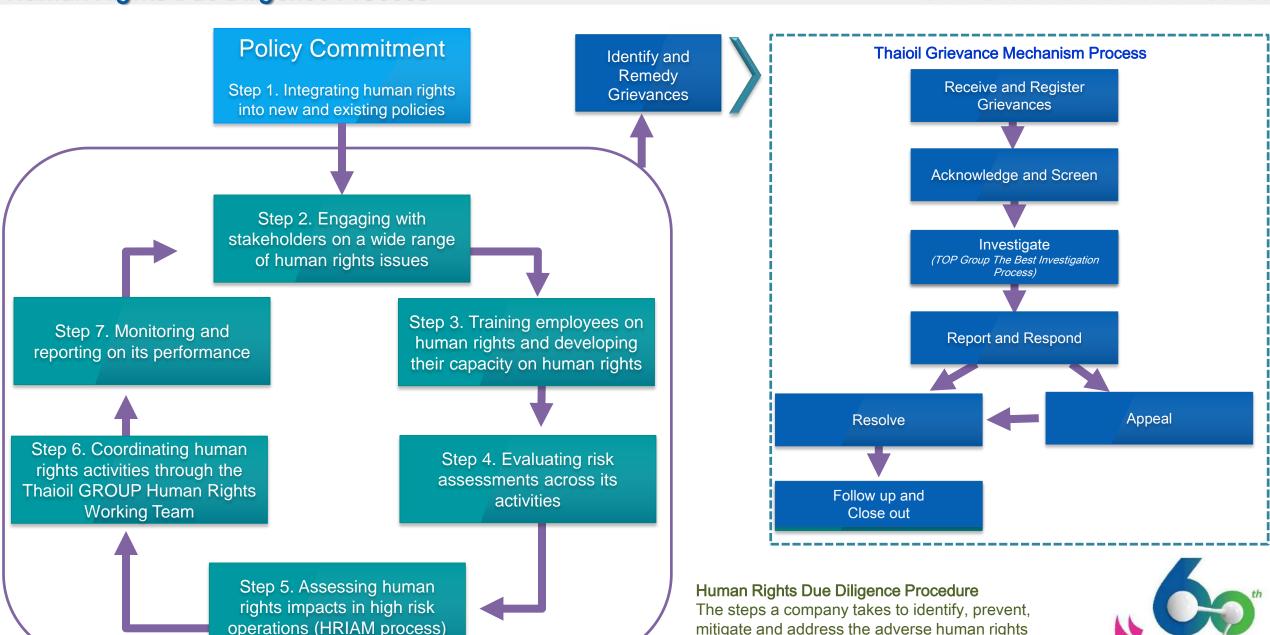
## Human rights risk assessment is part of Thaioil's 7-step human rights due diligence process.



Thaioil's human rights due diligence process is aligned with the UN Guiding Principles on Business and Human Rights. See more details on the <a href="https://example.com/Thaioil/Nebsite">Thaioil/Nebsite</a>.

## **Human Rights Due Diligence Process**

## **Grievance Mechanism Process**



impacts of its activities and relationships

## **Human Rights Impact Assessments and Management (HRIAM)**

Step 5. Assessing human rights impacts in high risk operations



Step 4.Evaluating risk assessments across its activities

Step 6.Coordinating human rights activities through the TOP GROUP Human Rights Working Team

Step 7. Monitoring and reporting on its performance



## **HRIAM** process;

#### 1. Thaioil GROUP's approach to human rights.

- 1.1. Thaioil GROUP's corporate commitments.
- 1.2. Thaioil GROUP' 7 Steps Human Rights Due Diligence Process.
- 1.3. Human rights impact assessments (HRIAs).

#### 2. HRIAs methodology and process.

- 2.1. Aligning with the UN Guiding Principles on Business and Human Rights.
- 2.2. From scoping risks to tracking remediation actions.

#### 3. Scoping human rights risks.

- 3.1. Understanding Company-level human rights issues.
- 3.2. Identifying Thaioil GROUP's business activities.
- 3.3. Mapping external stakeholders.

#### 4. Assessing actual and potential human rights impacts.

- 4.1. Assessing human rights impacts through 5 functional areas (Thaioil Value Chain).
- 4.2. Covering Thaioil GROUP's facilities and supply chains.
- 4.3. Engaging with rights-holders and stakeholders.

#### 5. Integrating and acting upon the findings.

- 5.1. Best practices and areas for improvement identified.
- 5.2. Remediation actions implemented at the operations and Company-levels.
- 5.3. Area-specific case studies (if any).

#### 6. Tracking responses and communicating how impacts are addressed.

- 6.1. HRIAs Reports and Action Plans.
- 6.2. The challenge of communicating results.
- 7. Mainstreaming human rights into Thaioil GROUP's policies and procedures.

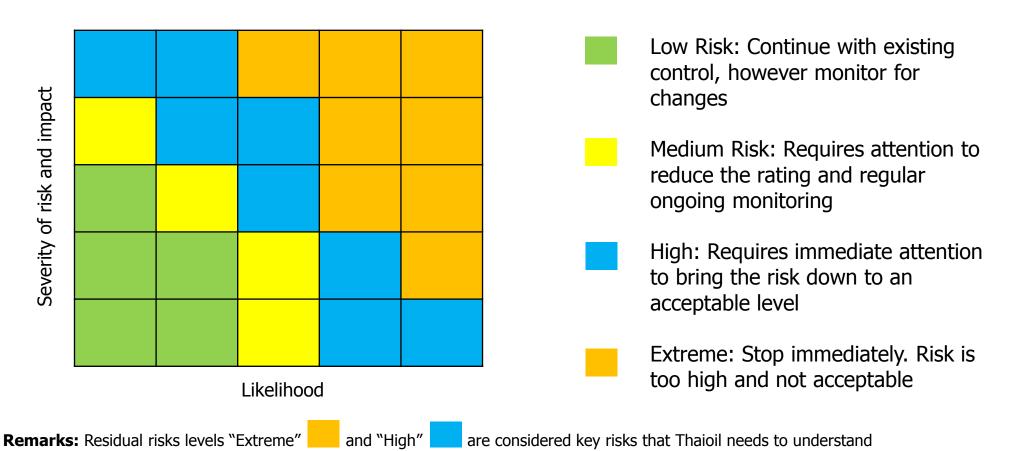


## **Human Rights Risks Assessment Matrix**

the effectiveness of its existing controls.

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.

The assessment takes into account Thaioil vulnerable groups covers all Stakeholders, specifically our employees, Contractor, Sub-contractor, Community, Suppliers, Customers, women and children, migrant labors, local community, disabled people, elderly, patients and transgender





## Thaioil Human Rights Risks Assessment Criteria: Severity

Severity	Scale	Scope	Remediability					
Catastrophic (5)	Severely affect health and life- threatening to the extent of disability or death	It affects all relevant stakeholders in the group (for example, all community, all employees, all supplier) in the relevant activities	Can not remedy the stakeholders concerned to return to normalcy.					
Major (4)	Impact on health and safety reached the break of work for more than 3 days	It affects virtually every stakeholder in the group (for example, all community, all employees, all supplier) in the relevant activities	It takes a long time to recover relevant stakeholders over 5 years.					
Moderate (3)	Impact on health and safety up to a 1-3 day break	It has an impact on some of the stakeholders involved in the group	It takes 3-5 years to recover relevant stakeholders.					
Minor (2)	Cause minor injury or health impact requiring medical attention. (Not injured to the point of stopping work)	Impact on stakeholders related to a small group	It takes 1-3 years to recover relevant stakeholders.					
<b>Low</b> (1)	It has little effect on health and safety. (First aid) or not affect health.	It does not have any impact on the stakeholders involved	It takes less than 1 year to recover relevant stakeholders.					

## Thaioil Human Rights Risks Assessment Criteria: Likelihood

Likelihood	Probability	Frequency	Description (How often might it/ does it happen?)						
Almost Certain	>80%	Almost Yearly	Will undoubtedly happen/ recur, possibly frequently						
(5)									
Likely	>60% - <80%	Every 1 to 2	Will probably happen/ recur, but it is not a persisting issue/ circumstances						
(4)		Years							
Possible	>40% - <60%	Every 3 to 4	Might happen or recur occasionally						
(3)		Years							
Unlikely	>20% - <40%	Every 5 to 10	Do not expect it to happen/ recur, but it is possible it may do so						
(2)		Years							
Rare	<20%	Every 10 Years	This will probably never happen/ recur						
(1)		and Beyond							



## **Human Rights Impact Assessments and Management (HRIAM)**



"Thaioil aims for sustainable growth and long-term persistence, operational excellence, as well as a focus on economic development coupled with social responsibility and environmental protection to create values for all stakeholders."

### "all stakeholders"

Main human rights issues and vulnerable groups

#### Thaioil's Vulnerable Groups.

The human rights issues related to the vulnerable groups covers all Stakeholders, including Employee, Contractor, Sub-contractor, Community, Supplier, Customer, children, indigenous people, and migrant labors (covered and in line with 13 The Human Rights Protection of Vulnerable Groups)

#### The Human Rights Protection of Vulnerable Groups;

- 1) women and girls;
- 2) children;
- 3) refugees;
- 4) internally displaced persons;
- 5) stateless persons;
- 6) national minorities;
- 7) indigenous peoples
- 8) migrant workers;
- 9) disabled persons;
- 10) elderly persons;
- 11) HIV positive persons and AIDS victims;
- 12) Roma/Gypsies/Sinti; and
- 13) lesbian, gay and transgender people.



## Scope of Thaioil Human Rights Risks Assessment: Thaioil Value Chain

Employee and Contractors	Safety, Security and Environment	Social and Communities	Suppliers and Sub-contractors	Customer and Consumer
PM	QM & CA	CA	PC	CM & TR
Labour Right  - Working conditions  - Anti-Slavery and Human Trafficking Policy  - Freedom of association and collective bargaining  - Forced and compulsory  - Equal pay policy  - Child labor,  - Non-Discrimination and Anti-Harassment Policy  - Safety and Health at Work Policy	Safety, Security and Environment  - Safety & Security management, - Security Training, - Water security, - Impact of pollution, - Waste and hazardous materials management, - Preservation of biodiversity	- Standards of living and quality of life, - Community health and safety, - Community engagement, - Cultural heritage, - Minorities including indigenous peoples, - Resettlement	Supplier engagement & code of conduct  Compliance with TOP Group Business and Human Rights Policy for Stakeholder (TOP) and Supplier Code (14 +17 issues)	Customer Right  - Consumer Health and Safety, - Data Privacy, - Access to energy

Existing control level by stakeholders
(Thaioil Risk Assessment by CR)



## **Human Rights Risk Assessment Overview**

Identify human rights issues

Screen
2 relevant
issues for
each activity

Assess

residual risk
levels

Determine additional mitigation measures

Identify human rights issues through reviewing issues reported by peers in the industry, recent news and events, and insights by human rights institutes such as the Institute for Human Rights and Business.

Screen issues according to relevance with the identified activity.

Assess residual risk levels considering existing mitigation measures.

Integrate findings and determine additional mitigation measures to lower risk levels for salient human rights issues.

This document details the risk assessment approach and findings in 2020 for both in <u>own operations</u> and <u>the supply chain</u>.







Human Rights in Own Operations

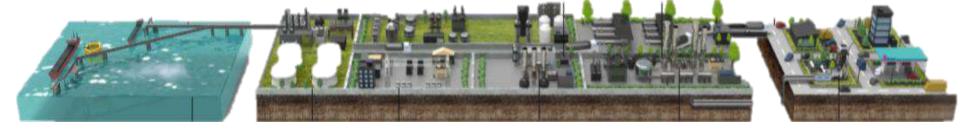
## The assessment covered all business activities in Thaioil's own operations, including joint ventures with management control.

1. Transportation

3. Power and Steam Generation

5. Other Businesses:

Treasury



2. Oil Refinery

4. Petrochemical and Chemical

Each main business is comprised of main activities and supporting activities.

Main activities: Operations

Supporting Activities: Human Resources, Procurement, Customer Relations, CSR
The supporting activities of the Treasury business are under the responsibility of Oil Refinery through shared service.

The assessment considered the following rights holders and vulnerable groups affected by Thaioil operations. Employees

Community members

Third-party contracted labour, subcontractors, and suppliers onsite

Customers and end consumers

Vulnerable groups; Children, Indigenous peoples, Migrant workers,

Religious or ethnic minorities, Persons with disabilities,

Women, elderly, patients and transgender



## Steps 1 and 2: Scope and screen relevant issues

## Human Rights Issues Identified and Screened

Human Rights Issues		Tran	sporta	ation			Oil	Refin	ery				wer a	nd eration	ı			hemic	cal and	t	Treasury
	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5	
Working Conditions	✓	✓	<b>✓</b>			✓	✓	<b>✓</b>			<b>✓</b>	✓	<b>✓</b>			<b>✓</b>	✓	✓			✓
Employee Health and Safety	<b>√</b>		<b>√</b>			<b>√</b>		<b>√</b>			<b>√</b>		<b>√</b>			<b>√</b>		<b>√</b>			✓
Illegal Forms of Labour	✓	✓	✓			<b>√</b>	✓	<b>√</b>			✓	✓	✓			✓	✓	✓			
Community Health and Safety	<b>√</b>					<b>√</b>					✓					<b>√</b>					
Community Standard of Living	<b>✓</b>					<b>√</b>					✓					<b>✓</b>					
Land Acquisition						<b>√</b>					✓										
Security Practices	✓					<b>✓</b>					✓					✓					
Customer Safety																<b>✓</b>					
Data Privacy				<b>√</b>					<b>√</b>					<b>√</b>					<b>✓</b>		✓

The supporting activities of the Treasury business are under the responsibility of Oil Refinery through shared service.

**Procurement** 

**Customer Relations** 

5 CSR

Human Resources

**Operations** 

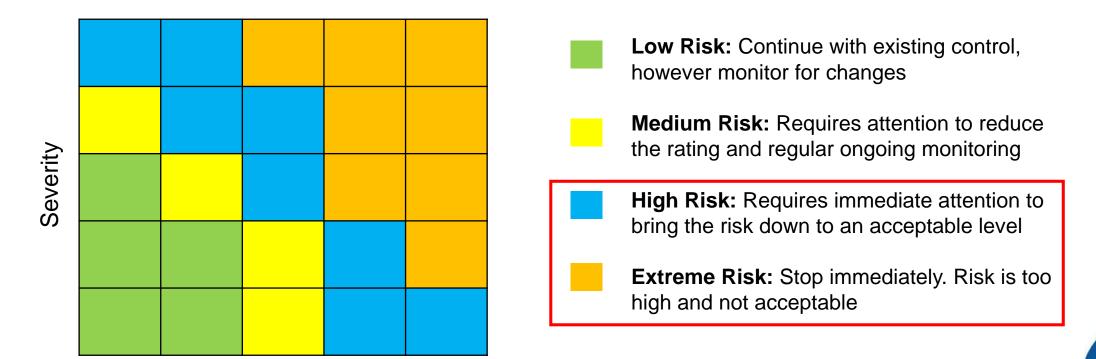
## Step 3 (1): Assess residual risk levels

Likelihood

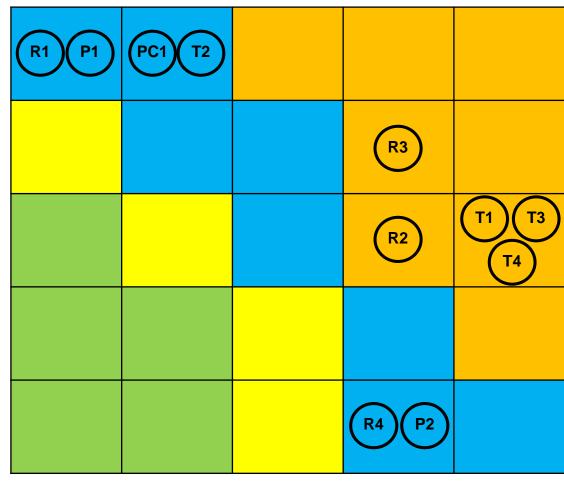
## Risk Assessment Matrix

The assessment of human rights risks considered **likelihood** and **severity** of each issue. Issues are plotted on a matrix like the one shown below, with likelihood in the x-axis and severity in the y-axis. Issues ranked at "high risk" or "extreme risk" are considered salient human rights issues.

The assessment takes into account Thaioil vulnerable groups covers all Stakeholders, specifically our employees, Contractor, Sub-contractor, Community, Suppliers, Customers, women and children, Indigenous peoples, migrant workers, Religious or ethnic minorities, local community, Persons with disabilities, elderly, patients and transgender



## Step 3 (2): Assess residual risk levels Human Rights Salient Issues



Likelihood

Trans	portation								
T1	Operations – Working Conditions								
T2	Operations – Employee Health and Safety								
T3	Human Resources – Working Conditions								
T4	Procurement – Working Conditions								
Oil Re	finery								
R1	Operations – Employee Health and Safety								
R2	Operations – Community Health and Safety								
R3	Operations – Community Standard of Living								
R4	Procurement – Working Conditions								
Power	and Steam Generation								
P1	Operations – Employee Health and Safety								
P2	Procurement – Working Conditions								
Petrochemical and Chemical									
PC1	PC1 Operations – Community Health and Safety								
Other Businesses: Treasury									
No salient issue									

Severity

## Step 4 : Determine additional mitigation measures

## Human Rights Salient Issues and Mitigation Measures

Activity and Sub Activity	)-	Human Rights Issue		Description of Risks		Existing and Additional Mitigation Measures		Result Monitoring			
Transportation	1	Employee Health and Safety	•	<ul> <li>Failure to properly conduct safety inspection of ships</li> <li>Inadequate safety equipment</li> </ul>		Ensure strict compliance with safety procedures, especially regarding inspection of safety equipment and high risk activities	•	100% complied with ILO standards 100% for preparing communication plans to employees in advance. 100% for Planning crew rotation			
2 3		Working Conditions T1 T3 T4	•	rest time and holidays due to unplanned changes in shipping schedules		Communicate to employees about potential scenarios where they may have to stay in the ship longer than planned [PLANNED] Investing more to bring employees back to shore when not able to dock (e.g., through small boats) [PLANNED] Planning crew rotation and monitoring to align with plans	<ul> <li>100% complied with safety inspection standards</li> <li>100% for prepare an audit plan and conduct audits according to the plan.</li> </ul>				
Oil Refinery	1	Employee Health and Safety R1	•	Inadequate safety training Safety risks, such as gas leaks		Safety management system certified by international standards Ensure strict compliance with safety procedures	•	100% complied with safety management system certified by international standards			
		Community Health and Safety R2		Safety risks from normal operations Impacts from construction, such as property damage that can cause safety impacts	•	Evacuation procedures in the event of emergency Community engagement and grievance mechanisms	•	Community in all areas in which Thaioil operates 50% have improved the workflow in emergency situations taking into account the COVID-19 situation. 50% have improved and communicated community			
		Community Standard of Living		<ul> <li>Impacts from construction, such as noise and property damage</li> </ul>		Community engagement and grievance mechanisms Payment of incurred costs from property damage	•	engagement and grievance mechanisms, including the COVID-19 situation. 34 complaints submitted by communities in 2020.			
	3	Working Conditions	<ul> <li>Working conditions for subcontractors that do not comply with labour laws</li> <li>Instances wherein suppliers employ subcontractors without informing Thaioil</li> </ul>			Monitoring supplier compliance with contract, which includes a clause on compliance with Supplier Code of Conduct with human rights principles [PLANNED] Increase monitoring on subcontractors	•	100% complied with contract, which includes a clause on compliance with Supplier Code of Conduct with human rights principles 100% for prepare an audit plan and conduct audits according to the plan.			

1 Operations

2 Human Resources

3 Procurement

4 Cus

**Customer Relations** 

5

CSR



Activity and Sub- Activity		Human Rights Issue	Description of Risks	Existing and Additional Mitigation Measures	Result Monitoring
Power and Steam Generation	1	Employee Health and Safety P1	<ul> <li>Inadequate safety training</li> <li>Safety risks, such as gas leaks</li> </ul>	<ul> <li>Safety management system certified by international standards</li> <li>Ensure strict compliance with safety procedures</li> </ul>	<ul> <li>100% complied with safety management system certified by international standards</li> <li>50% have prepared an audit plan and conduct audits according to the plan.</li> </ul>
	3	Working Conditions P2	<ul> <li>Working conditions for subcontractors that do not comply with labour laws</li> <li>Instances wherein suppliers employ subcontractors without informing Thaioil</li> </ul>	<ul> <li>Monitoring supplier compliance with contract, which includes a clause on compliance with Supplier Code of Conduct with human rights principles</li> <li>[PLANNED] Increase monitoring on subcontractors</li> </ul>	<ul> <li>100% complied with contract, which includes a clause on compliance with Supplier Code of Conduct with human rights principles</li> <li>100% for prepare an audit plan and conduct audits according to the plan.</li> </ul>
Petrochemical and Chemical	1	Community Health and Safety PC1	<ul> <li>Chemical leaks during distribution and logistics activities, especially flammable substances</li> </ul>	<ul> <li>Inspection of vehicles</li> <li>[PLANNED] Increase inspection and maintenance procedures</li> </ul>	<ul> <li>50% have prepared an audit plan and conduct audits according to the plan.</li> </ul>
Other Businesses: Treasury	-	(No salient issue.)	(No salient issue.)	(No salient issue.)	All Thaioil affiliate strictly complied with amended laws.

1 Operations

2 Human Resources

3 Procurement

4

**Customer Relations** 

5

CSR



# In May 2020, Thaioil assessed human rights risks in all operational sites, and ensured that all risks have mitigation measures

100%

% of total operational sites in Thaioil group (including joint ventures with management control) assessed in last three years

(21 sub-activities assessed / 21 sub-activities)

38%

% of total operational sites in Thaioil group (including joint ventures with management control) assessed where risks have been identified

(8 sub-activities with salient issues / 21 sub-activities assessed)

100%

% of risk with mitigation or remediation process implemented

(See Step 4 : Determine additional mitigation measures)



### **Human Rights Risk Assessment in Own Operations 2020**

In 2020, Thaioil conducted human rights risk assessment that covered 100% of all business activities in our value chain, including both the activities that are part of our core business, as well as the activities related to our other businesses and joint ventures. The assessment was conducted by applying our enterprise risk management framework to assess and determine the level of human rights risks. Thaioil assessed the severity and likelihood of the human rights risks in accordance with the UN Guiding Principles on Business and Human Rights, and comprehensively reviewed salient human rights issues that may affect internal and external stakeholders.

The 2020 human rights risk assessment revealed that 38% of Thaioil Group's operational sites have residual risks, with 100% of operational sites with risk mitigation measures. The outcomes of this assessment have been validated by relevant personnel responsible overseeing Thaioil Group's business activities in the value chain. The Thaioil **Group Human Rights Working Team has also** reviewed the results and regularly monitors these issues.

#### The scope of the human rights risk assessment conducted for own operations included

- Refinery business
- : Thaiol Public Company Limited
- Petrochemicals business
- : Thai Lube Base Public Company Limited, Thai Paraxylene Company Limited,
- LABIX Cmpany Limited,
- Thaioil Solvent Company Limited, TOP Solvent Company Limited, and Sak Chaisidhi Company Limited
- Power and steam business : Thaioil Power Company Limited and **TOP SPP Company Limited**
- · Transportation business
- : Thaioil Marine Company Limited
- Other supporting businesses: Thaioil Energy Services Company Limited and Thaioil Treasury Center Company Limited.





Human Rights in the Supply Chain

# The assessment covered all supplier groups of Thaioil's subcontractors and Tier 1 suppliers.

Non-Cru	Crude	Procureme	ent	
Material Supplier Group	Service Supplier Group	International	Trader	Shipping
<ul> <li>Electrical equipment and accessories (40)</li> <li>General consumable and supply (147)</li> <li>Instrument equipment and accessories (73)</li> <li>IT and communication equipment (6)</li> <li>Marine, offshore, and accessories (3)</li> <li>Mechanical equipment (110)</li> <li>Oil, chemical, and laboratory supply (70)</li> <li>Pipe, valve, flange and fitting (32)</li> <li>Safety equipment (25)</li> </ul>	<ul> <li>Civil equipment and services (29)</li> <li>Electrical and instrument and services (60)</li> <li>General non-technical service (215)</li> <li>General technical service (44)</li> <li>IT and communication (45)</li> <li>Mechanical engineering and service (70)</li> <li>Piping engineering and service (5)</li> <li>Manpower (8)</li> <li>Consulting service (56)</li> <li>Project management and engineering design (8)</li> <li>Utility and intercompany (2)</li> </ul>	Oil Company (10)	(18)	(17)

The assessment considered the following rights holders and vulnerable groups affected by suppliers' operations. Suppliers' employees

Suppliers' community members

Third-party contracted labour, subcontractors, and suppliers onsite

Customers and end consumers of suppliers

Vulnerable groups; Children, Indigenous peoples, Migrant workers,

Religious or ethnic minorities, Persons with disabilities,

Women, elderly, patients and transgender

# Steps 1 and 2: Scope and screen relevant issues

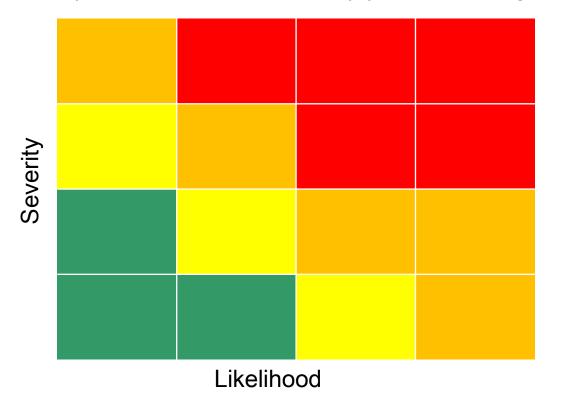
## Human Rights Issues Identified and Screened

	Non-Crude Procurement		Crude Procurement		
Human Rights Issues	Material Supplier Group	Service Supplier Group	International Oil Company	Trader	Shipping
Working Conditions	✓	<b>✓</b>	✓	✓	✓
Employee Health and Safety	✓	✓	✓		✓
Illegal Forms of Labour	✓	✓	✓		✓
Community Health and Safety	✓	✓	✓		✓
Community Standard of Living	✓	✓	✓		✓
Land Acquisition	✓		✓		
Security Practices			✓		
Customer Safety	✓		✓		✓
Data Privacy		✓			

# Step 3 (1): Assess residual risk levels Risk Assessment Matrix

The assessment of human rights risks considered **likelihood** and **severity** of each issue. Issues are plotted on a matrix like the one shown below, with likelihood in the x-axis and severity in the y-axis. Issues ranked at "high risk" or "extreme risk" are considered salient human rights issues.

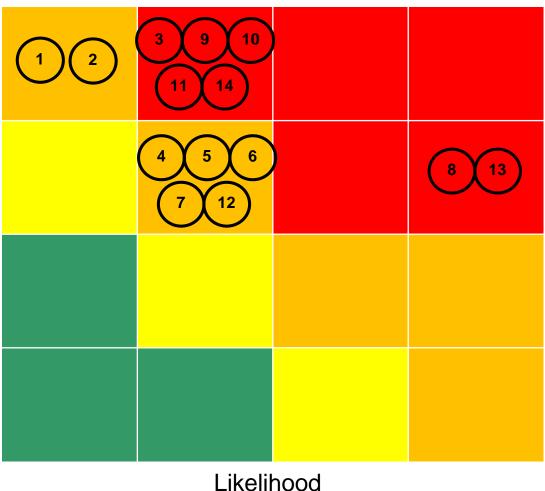
The assessment takes into account Thaioil vulnerable groups covers all Stakeholders, specifically our employees, Contractor, Sub-contractor, Community, Suppliers, Customers, women and children, Indigenous peoples, migrant workers, Religious or ethnic minorities, local community, Persons with disabilities, elderly, patients and transgender



- Low Risk: Continue with existing control, however monitor for changes
- Medium Risk: Requires attention to reduce the rating and regular ongoing monitoring
- High Risk: Requires immediate attention to bring the risk down to an acceptable level
- Extreme Risk: Stop immediately. Risk is too high and not acceptable

## Step 3 (2): Assess residual risk levels

# Human Rights Salient Issues



		_	
	NON-CRUDE PROCUREMENT		CRUDE PROCUR
Mar	ine, offshore, and accessories*	Inte	rnational Oil Company
1	Employee health and safety	10	Employee Health and
Med	chanical equipment and accessories*	11	Community Health an
2	Employee Health and Safety	12	Community Standard
Oil,	chemical, catalyst, and laboratory	Shi	o Owner
3	Employee health and safety	13	Working conditions
4	Community health and safety	14	Employee Health and
Civi	l equipment and services	*0 -1 ()	
5 Employee health and safety			Only manufactui
Med	chanical engineering and service		
6	Employee health and safety		
Pipi	ng engineering and service		
7	Employee health and safety		
Pro	ject management and engineering		
8	Working conditions		
9	Employee health and safety		

\*Only manufacturers

**CRUDE PROCUREMENT** 

Employee Health and Safety

Community Health and Safety

Community Standard of Living

**Employee Health and Safety** 



Severity

## Step 4 (1): Determine additional mitigation measures

## Human Rights Salient Issues and Mitigation Measures

Supplier Type	Supplier Group	Human Rights Issue	Description of Risks	Mitigation Measures and Remediation Actions	Result Monitoring
Non-Crude Procurement	Marine, offshore, and accessories	Employee Health and Safety	Accidents in transport (e.g., planes or shipping)	<ul> <li>Supplier screening, audit, and self-assessments regarding safety</li> <li>[PLANNED] Follow up P.O. during the coronavirus pandemic</li> </ul>	<ul> <li>All Supplier strictly complied with amended laws and service agreement.</li> <li>In 2020, Thaioil revisited the ESG Plus Verification project in light of the COVID-19 pandemic, and adapted the approach for third party assessment towards the use of audit reports and certifications such as ISO 14001, ISO 18001, ISO 26000, ISO 20400, and CAC certification for verification. Based on this approach,         <ul> <li>37 suppliers – 95% of high risk suppliers and 65% of critical suppliers – passed the verification.</li> </ul> </li> <li>Organizing meetings between contractors and Thaioil Group's executives to reiterate the importance of safety in the workplace and prepare readiness for the major turnaround to</li> </ul>
	Mechanical equipment and accessories	Employee Health and Safety	Accidents in transport (e.g., planes or shipping)	<ul> <li>Supplier screening, audit, and self-assessments regarding safety</li> <li>[PLANNED] Follow up P.O. during the coronavirus pandemic</li> </ul>	
	Oil, chemical, catalyst, and lab supply	Employee Health and Safety	<ul> <li>Inadequate safety equipment</li> <li>Chemical leaks</li> </ul>	<ul> <li>Supplier screening, audit, and self-assessments regarding safety</li> <li>Suppliers' plans to install water curtain to prevent chemical leaks</li> <li>[PLANNED] Increase process safety inspection in supplier operations</li> <li>[PLANNED] Collect safety performance statistics from suppliers (e.g., TRIR)</li> </ul>	
		Community Health and Safety	<ul> <li>Chemical leaks</li> <li>Wastewater discharge</li> <li>Emissions</li> <li>Road accidents and other impacts from distribution and logistics activities</li> </ul>	<ul> <li>Communicate Thaioil's policy regarding human rights and ESG</li> <li>[PLANNED] Increase process safety inspection in supplier operations</li> </ul>	ensure that tasks can be completed as planned;



## Step 4 (2): Determine additional mitigation measures

## Human Rights Salient Issues and Mitigation Measures

Supplier Type	Supplier Group	Human Rights Issue	Description of Risks	Mitigation Measures and Remediation Actions	Result Monitoring
Non-Crude Procurement	Civil equipment and service	Employee Health and Safety	Accidents from use of machinery	<ul> <li>Supplier screening, audit, and self-assessments regarding safety</li> <li>Subcontractors are provided with PPE and safety training</li> <li>[PLANNED] Prepare toolboxes for subcontractors and revisit number of safety officers</li> </ul>	Other than directly providing recommendations to suppliers who have high risk levels and/or non-compliance with the SCOC, Thaioil also gives opportunities for suppliers to join other activities to promote capability and capacity in managing environmental, social, and governance (ESG) performance, such as:     Inviting 52 key suppliers that have
	Mechanical engineering and service	Employee Health and Safety	Accidents from use of machinery	<ul> <li>Supplier screening, audit, and self- assessments regarding safety</li> <li>Subcontractors are provided with PPE and safety training</li> </ul>	expressed interest through the annual supplier survey to listen to the SME Executive Briefing in the CAC SME Certification Project; - Inviting 169 key suppliers to attend the PTT Group CG Day with PTT Group;
	Piping engineering and service	Employee Health and Safety	Accidents from use of machinery	<ul> <li>Supplier screening, audit, and self- assessments regarding safety</li> <li>Subcontractors are provided with PPE and safety training</li> </ul>	- Communicating CSR in Supply Chain through our website  - Communicating the Company's corporate vision, procurement principles, construction plans,
n a e	Project Working management and engineering design  Working Conditions  Employee Health and Safety	<ul> <li>Contractors missing payment to subcontractors</li> </ul>	Grievance procedure and investigation	approach to supplier performance evaluation and awards giving, Thaioil Group Supplier Code of Conduct and expectations relating to ESG aspects, as well as Thaioil's approach to circular	
		<ul><li>Drinking while working</li><li>Bringing lighters into working area</li></ul>	<ul> <li>Supplier screening, audit, and self- assessments regarding safety</li> <li>Sending warning letters to suppliers with incidents</li> </ul>	economy, human rights in the supply chain, and corporate governance, during the annual supplier conference, in which the theme for this year is "Partner for Life";	

## Step 4 (3): Determine additional mitigation measures

## Human Rights Salient Issues and Mitigation Measures

Supplier Type	Supplier Group	Human Rights Issue	Description of Risks	Mitigation Measures and Remediation Actions	Result Monitoring
Crude Procurement		Employee Health and Safety	Oil spills	<ul> <li>Supplier Code of Conduct that covers human rights</li> <li>[PLANNED] Collecting information from suppliers</li> </ul>	Reviewing supplier evaluation results – which reflected supplier performance in meeting Thaioil's expectations regarding work
Ship Owner		Community Health and Safety	Oil spills	<ul> <li>Supplier Code of Conduct that covers human rights</li> <li>[PLANNED] Collecting information from suppliers</li> </ul>	quality, occupational health and safety, and timeliness of product/ service delivery – and awarded certificates and plaques of honour to contractor companies who
		Community Standard of Living	Impacts from oil spills to local economy (e.g., fishery)	<ul> <li>Supplier Code of Conduct that covers human rights</li> <li>[PLANNED] Collecting information from suppliers</li> </ul>	successfully fulfilled their duties during the 2020 major turnaround; and  • Organizing supplier relationship building activities to ensure that suppliers are aware of, understand and follow Thaioil's commitment regarding transparency in procurement processes, such as the No Gift Policy.
	Emplo Health	Working Conditions	<ul> <li>Long working hours and limited rest time and holidays due to unplanned changes in shipping schedules</li> </ul>	<ul> <li>Proper employee communication regarding potential scenarios where they may have to stay in the ship longer than planned</li> <li>Invest in increasing capacity to transfer crew members such that they may not have to remain on the ship longer than planned</li> </ul>	
		Employee Health and Safety	<ul> <li>Failure to properly conduct safety inspection of ships</li> <li>Inadequate safety equipment</li> </ul>	Ensure strict compliance with safety procedures, especially regarding inspection of safety equipment	

# In May 2020, Thaioil assessed human rights risks in all tier 1 suppliers, and ensured that all risks have mitigation measures.

100%

% of total number of contractors and Tier 1 suppliers assessed in the last three years

1,093 suppliers assessed / 1,093 active suppliers)

24%

% of total number of contractors and Tier 1 suppliers where risks have been identified

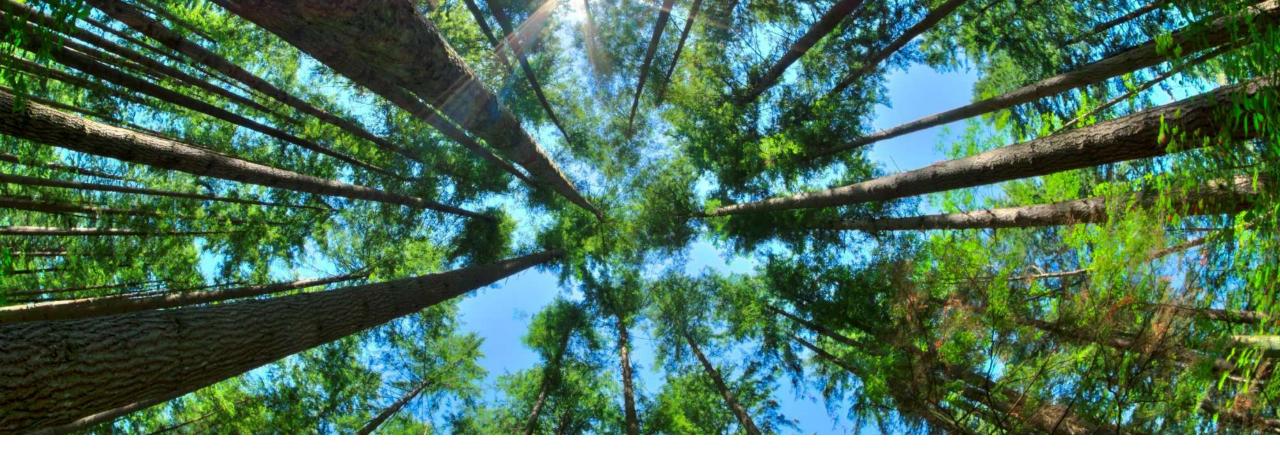
(265 suppliers with salient issues / 1,093 assessed suppliers)

100%

% of high risk contractors and Tier 1 suppliers with mitigation or remediation process implemented

(See Step 4 : Determine additional mitigation measures)

(265 suppliers with salient issues with mitigation measures / 265 suppliers with salient issues)



Human Rights Risk Assessment in the Supply Chain 2020 Besides assessing risks in our own operations, Thaioil also assesses the risks resulting from the activities of our tier 1 suppliers. The assessment covered 100% of tier 1 suppliers, for both crude oil procurement and general procurement. The Company assessed severity and likelihood based on the risk assessment criteria, and considered the scope of issues that is aligned with the Sustainable Code of Conduct for Supplier of Thaioil and Subsidiaries (SCOC).

The 2020 risk assessment revealed that 24% of all activities have human rights risks. Identified risks included those relating to working conditions and occupational health and safety. Thaioil has prepared adequate measures to manage these issues, including rules, regulations, contracts, and communications to increase understanding of human rights policies and practices.



## **Spotlight on issues**

Thaioil gives importance to employee and organizational development, and is committed to motivating employees to continuously learn and deepen their knowledge, even during challenging times such as the COVID-19 pandemic. As transportation and training seminars have been restricted, we have developed a digital platform to promote learning for employees. Through this platform, employees can access information relating to best practices and online courses, as well as arranging training simulators for employee in the production function to ensure their readiness for actual operations.

Spotlight on Human Right Mindset Spotlight on COVID-19



#### **Spotlight on Human Right Mindset**

### **Communications and Activities to Promote Human Rights**

In 2020, Thaioil Group developed our communications strategy and organized additional activities to promote human rights for our stakeholders. We used the "3 parts for fulfilling human rights" framework, which includes:

#### Part I = Ensuring education for all:

Thaioil will take action to ensure that our stakeholders are conscious of and understand human rights. For employees, the Company has developed a Human Rights E-Learning course which is accessible to all employees through the "Thaioil Academy **Application**". We have also organized other activities to increase human rights awareness for other stakeholders, such as the Human Rights Workshop for Thaioil Affiliates; the lecture series we provided to suppliers as a part of the annual Thaioil group supplier seminar in 2019

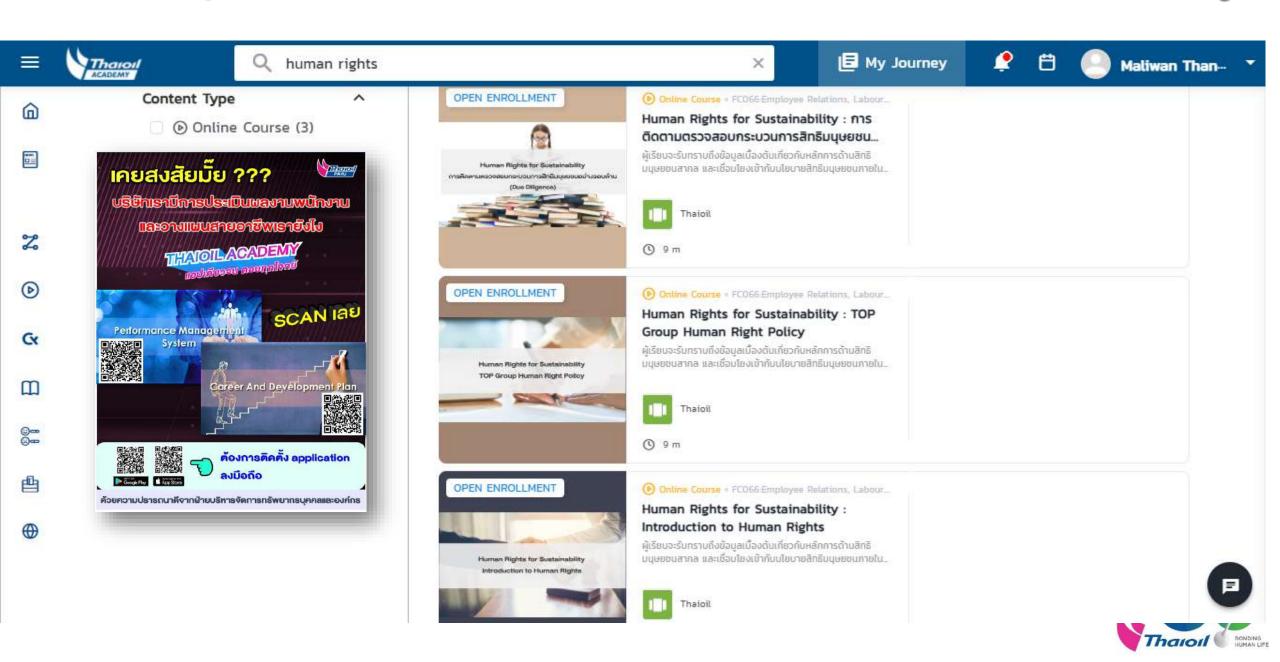




(SRM Seminar 2019). In 2020, Thaioil Group organized another lecture series – also a part of the annual supplier seminar, but held online (SRM Seminar 2020: Microsoft Team Live) – to deepen supplier understanding of human rights.

#### Part I = Ensuring education for all:

#### **Communications and Activities to Promote Human Rights**



#### **Spotlight on Human Right Mindset**

### **Communications and Activities to Promote Human Rights**

In 2020, Thaioil Group developed our communications strategy and organized additional activities to promote human rights for our stakeholders. We used the "3 parts for fulfilling human rights" framework, which includes:

#### Part II = Improving mental health care:

4 Happiness: New Normal Work Life: All employees should understand the rights they are entitled to, including the benefits they should receive as employees and as retired employees. Thaioil Group has thus developed the 4 Happiness initiative for employees, which includes 4 projects:



#### Health Meter

The Health Meter Project serves to care for employees and safeguard their health. Thaioil Group also cares for retired employees through providing office spaces, welfare and other support to care for physical health, through the "Thaioil Alumni Association".

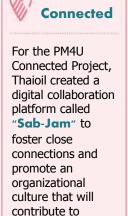


The Health
Resilience Project
looks after
employees' mental
health to enhance
working
happiness.



#### Flexible Benefits

The Flexible Benefits Project is directed towards meeting employees' needs, by allowing them to adjust and choose benefits by themselves.



employee happiness.

PM<sub>4</sub>U





#### **Spotlight on COVID-19**

# Part III = Working with the right to health:

In response to the outbreak of the COVID-19 pandemic, Thaioil Group established the "I-COVID Center" as a working committee to align the organization's occupational health and safety and environmental policies with government direction in order to protect the safety of our employees, subcontractors, business partners, and other stakeholders, to ensure that they comply with social distancing measures, and to strengthen customers' and business partners' confidence in Thaioil Group's ability to conduct business with stability and maximum efficiency while wholly meeting the needs of customers and business partners.

#### Work from Home:

WFH To safeguard employees against the health risks and impacts prevalent during the COVID-19 pandemic, Thaioil has established work from home measures for over 60% of all employees. Thaioil established a digital infrastructure to support employees in carrying out the Company's business operations while not compromising their safety. This includes working collaboratively through the cloud platforms, using online meeting programs for big and small meetings, and providing access to important work systems for employees, such as SAP and Ariba, through the use of the organization's VPN to ensure safety of privacy during use.

### **Communications and Activities to Promote Human Rights**

Establish control measures for

Distancing

Platform

external onsite visits, such as Health

Declaration, Self Monitoring, Physical

. Organize Work from Home initiatives

and working through a Collaboration

#### **COVID-19 Control Measures**

#### **KEY OBJECTIVES**

#### **PEOPLE FIRST**

- To protect employees and ensure their safety from the disease
- To adapt work processes to align with conditions of new normal, such as the need to social distance and work from home
- To give employee confidence that the Company will take good care of their well-being

#### **BUSINESS CONTINUITY**

- To maintain business continuity and prevent infection among employees
- To establish Mission Critical Activities (MCA) by prioritizing the operational area that are critical to the business

#### SOCIAL CARE

 To be a part of the community and society in overseeing public health initiatives and prevent infection through donating medical equipment and providing care packages to affected communities around the refinery



-COVID

CENTER

Cluster Mission Critical

Group and Engineering,

pose business impacts

Activities - MCA; Operations

to protect the operation areas

that, if compromised, would

