



Human Rights Due Diligence (HRDD) Report

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รายงานการตรวจสอบสิทธิมนุษยชนอย่างรอบด้าน ปี 2567

S HOTELS & RESORTS PUBLIC COMPANY LIMITED

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Reported by

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1. Introduction

S Hotels and Resorts Public Company Limited (“the Company”) and its subsidiaries (collectively referred to as “the Group”) are committed to sustainable development policies and recognize the economic, social, and environmental impacts on stakeholders. The Group respects diverse socio-cultural contexts, promotes engagement, and enhances quality of life while enriching travel experiences alongside creating “value for life” (Enriching Life). Business-related human rights issues are among the key areas of focus for the Company.

The Company has implemented a comprehensive Human Rights Due Diligence (HRDD) process in alignment with the United Nations Guiding Principles on Business and Human Rights (UNGP), which are based on the three pillars: Protect – Respect – Remedy. Additionally, the Company ensures the establishment of remediation mechanisms in cases where human rights violations affecting stakeholders occur as a result of its business operations.

2. Goal and Objective

The Company places great importance on conducting business in accordance with good corporate governance principles, social responsibility, and accountability to all relevant stakeholders. In alignment with its sustainable development philosophy, the Company has implemented a comprehensive human rights due diligence process to identify potential impacts on stakeholders both within and outside the organization. This ensures careful adherence to human rights principles throughout the business value chain, in compliance with international standards. The process aims to mitigate human rights impacts that have occurred or may arise from business operations and enables the Company to effectively plan and manage risks related to human rights issues.

3. Scope

The scope of operations encompasses the assessment of human rights risks and impacts at the organizational level of the Company and its group of companies. This includes self-managed hotel in Thailand and the Republic of Maldives, as well as external parties who may be involved or affected by the Company's activities, such as customers, business partners, communities, and the surrounding environment. The assessment of human rights

risks and impacts is conducted in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGP).

4. Definition

Word or text	Definition
Human Rights ¹	<ul style="list-style-type: none"> - Natural rights inherent to humans from birth. Every human being has human dignity. - Universality and Inalienability - Inability to be divided and the absence of any right being more significant than another (Indivisibility) - Equality and Non-discrimination - Coverage of diverse issues/community diversity, respect human dignity, child labor/forced labor, nondiscrimination, gender equality, personal rights, rights of persons with disabilities, children's rights, quality of life maintenance for workers and establishments, ensuring safety and good health, data privacy and security, including fair employment practices and compensation.
Sustainability/ Sustainable Development ²	Sustainable development that responds to the needs of the present generation without compromising the ability of future generations to meet their own needs.
Employee	Employees, temporary employees, and special temporary contract employees of the company and its subsidiaries.
Child labor	Adhering to the laws of the country where the company or its subsidiaries operate. In the context of Thailand, it refers to employees who are children aged 15 and above but not yet 18 years old. Employers are prohibited from hiring children under 15 years old as employees. Individuals aged 18 and above are not considered child labor.

Standard Labour/ Forced Labor ³	Compelling individuals to work through coercion, intimidation, detention, threat of delay, abuse, or punishment, without the individual's voluntary consent or willingness.
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¹National Human Rights Commission of Thailand, 2019

² World Commission on Environment and Development. 'Our Common Future'. Oxford: Oxford University Press, 1987

³ The Convention Concerning Forced or Compulsory Labour, 1930 (No 29), International Labour Organization

5. Roles and Responsibilities

Stakeholders involved in conducting the Company's human rights risk and impact assessments should include individuals with the following responsibilities:

5.1. Responsible Party

The Sustainability Development Division oversees human rights impact assessments and has the following roles and responsibilities:

- Develop procedures for assessing human rights risks and impacts within the organization, coordinate with relevant departments, and periodically review and improve these procedures to enhance future assessments.
- Monitor and ensure the effective implementation of human rights risk and impact assessment procedures by relevant departments, including identifying human rights issues, managing them, and implementing measures to reduce the risks and impacts.

5.2 Participants in the Human Rights Risk Assessment Process

The Sustainability Development Division acts as the lead unit responsible for overseeing documentation and guiding the implementation of the human rights risk and impact assessment process. As human rights considerations are a critical component of sustainability management, various relevant departments participate in this assessment process. These departments include those responsible for human resources, community and government relations, supply chain, security, safety, occupational health and environmental

management, investment, analysis and planning, as well as customer relations. Their roles and responsibilities are as follows:

- Identifying human rights issues and assessing the level of impact relevant to their respective departments.
- Establishing control measures to mitigate identified impacts.
- Periodically reviewing the results of human rights risk assessments in accordance with the human rights impact assessment procedures. Reviews are conducted annually for high-risk findings, and every two years for low-risk findings.
- Regularly reviewing and updating related documents to ensure they remain accurate and up to date.

6. Human Rights Risk and Impact Assessment Process



6.1 Policy Commitment

The Company is committed to conducting its business in accordance with good corporate governance principles, with responsibility toward society and all stakeholders. In alignment with its sustainable development philosophy, the Company has established a Human Rights Policy to serve as a guideline for conducting business with respect for human rights and with caution to prevent violations throughout the business value chain, in compliance with international standards. For more details, please visit the Company's website.

<http://investor.shotelsresorts.com/storage/content/corporate-governance/cg-document-and-download/20230317-human-right-policy-th.pdf>

Additionally, the Company has communicated and encouraged its business partners to be aware of conducting business based on human rights principles, as part of its commitment to sustainable development. This is achieved through organizing the S Supplier Day event.

6.2 Assessment of Actual or Potential Impacts

The Company places great importance on assessing actual or potential human rights impacts arising from its business operations. A risk assessment process is implemented to identify and analyze potential risks affecting human rights at both the organizational level and across the business network. This process encompasses risks directly linked to the Company's activities and those indirectly arising from business partners, suppliers, or other stakeholders. The objective is to ensure that the Company conducts its business responsibly and respects the fundamental rights of all relevant parties.

This assessment considers potential impacts on both internal and external stakeholders. Internal stakeholders include employees, subcontractors, and migrant workers, while external stakeholders comprise local communities in operational areas, customers, and business partners. The assessment process evaluates both the severity and likelihood of impacts, incorporating stakeholder participation to identify concerns and provide recommendations. This information is crucial for developing preventive measures, managing risks, and effectively addressing and mitigating any impacts that may occur.

6.3 Integration of Policies with Assessments, Including Internal and External Controls

6.3.1 Human Rights Identification

The company has identified human rights issues related to its hotel business activities and expects to categorize the human rights risks into 7 key issues as follows

<p>1. Community engagement</p> <ul style="list-style-type: none"> • Land management • Quality, sufficiency, and access to water sources • Cultural impacts • Security management • Environmental conditions • Violation of rights 	<p>2. Migrant worker</p> <ul style="list-style-type: none"> • Workforce procurement • Travel documents/Identification documents • Employment conditions • Working environment conditions 	<p>3. Contract labor</p> <ul style="list-style-type: none"> • Employment • Working environment conditions • Workplace conditions • Contract labor management 	<p>4. Business Partner</p> <ul style="list-style-type: none"> • Production processes • Working environment conditions • Workplace conditions • Health and safety • Community involvement
<p>5. Employees</p> <ul style="list-style-type: none"> • Employment • Workplace environment • Practices selection • Freedom of association and collective bargaining • Discipline and punishment • Employee privacy 	<p>6. Temporary employees</p> <ul style="list-style-type: none"> • Employment • Workplace environment • Practices selection 	<p>7. Customers</p> <ul style="list-style-type: none"> • Room reservation • Safety • Practices selection • Data protection Privacy 	

6.3.2 Risk Assessment

Risk Criteria

The Risk Criteria are tools used to identify the level of risk of risk factors in the company's operations, with guidelines established for assessing the **Impact** and **Likelihood** of occurrence.

Likelihood

The levels of the likelihood of risk events occurring and the extent of potential damage are divided into 4 levels, with definitions for each level as follows:

Level	Description	Frequency of Risk Occurrence	Likelihood of Risk Occurrence
4	Very High	Once per year	80% or more
3	High	Once per every 3 years	40% or more, but less than 80%
2	Medium	Once per every 5 years	20% or more, but less than 40%
1	Low	Once every more than 5 years	Less than 20%

Impact

The levels of damage from risk events are divided into 10 main areas, with each area categorized into 4 levels. The definitions for each level are as follows:

Measuring the Severity of Impact (Impact)							
Level	Description	Corporate strategy	Finance	Reputation and Image			Business Operations
				Customer Satisfaction	Affected Parties	Litigation/Complaints	
4	Very High	Severe impact on corporate strategy: Requires changes at the overall business level, including overarching strategies, as well as both short-term and long-term goals. Organizational adjustments to align with the new strategy will take more than one year.	EBITDA falls short of the target by 5% or more.	Customer satisfaction level decreases by more than 10% from the established benchmark.	It has an impact on the company's major shareholders, the company itself, and the board of directors.	Complaints submitted to social media both internally and externally, with compensation for damages and/or the dissemination of news through various media outlets, requiring an official clarification to relevant authorities.	Impact on the operations of some key hotels/projects, causing a disruption of more than 2 weeks.

3	High	<p>Significant impact on corporate strategy:</p> <p>Requires partial changes to strategies and goals in both the short and long term.</p> <p>Organizational adjustments to align with the new strategy can be implemented within one year.</p>	<p>EBITDA falls short of the target by 3% but less than 5%.</p>	<p>Customer satisfaction level decreases by 5% to 10% from the established benchmark.</p>	<p>It has an impact on multiple departments or affects the management or executive team.</p>	<p>Complaints on social media both internally and externally.</p>	<p>Impact on the operations of some hotels/projects, causing a disruption lasting from 1 to 2 weeks.</p>
2	Medium	<p>Impact on short-term strategies and goals:</p> <p>The organization can adjust its strategies to align with changing circumstances within 3–6 months.</p>	<p>EBITDA falls short of the target by 2% but less than 3%.</p>	<p>Customer satisfaction level decreases by 3% to 5% from the established benchmark.</p>	<p>It has an impact limited to a specific department or within a particular division.</p>	<p>Complaints on the company's social media, not yet released to external media, and can be resolved within 1-3 days.</p>	<p>Impact on the operations of some hotels/projects, causing a disruption of less than one week.</p>

1	Low	Minor impact on strategy: Short-term and long-term goals remain unchanged, and operations can continue as planned.	EBITDA falls short of the target by less than 2%.	Customer satisfaction level decreases by less than 3% from the established benchmark.	An impact limited to individuals.	Complaints submitted to the company's internal complaint handling department.	Minor impact on the operations of the hotel/project, which allows the company to continue its business as usual.
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Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
4	Very High	<ul style="list-style-type: none"> Project costs exceed the budget by $\geq 8\%$ Construction costs exceed the 	<ul style="list-style-type: none"> For on-premise systems, disruption lasting more than 24 hours 	Data that supports critical business processes is damaged for more	Matters that may lead to the revocation of a license essential for business operations.	Employees experience severe dissatisfaction, such as organizing a strike or resigning,	An accident occurs resulting in injuries that cause the employee to miss work for more	It has a severe impact on the environment,(a) Service must be suspended for more than 7 days and/or	(a) It has a wide impact on the community within a 100-meter radius from the project and/or

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
		budget by > 10% • Delay in the project schedule exceeding 28 days	• For cloud systems and connectivity, disruption exceeding 72 minutes per day	than 1 day in the past.		leading to a disruption in business operations or the emergence of disputes that	than 3 days and/or property damage valued at more than 500,000	(b) Significant resources and time (more than 30 days) are required to resolve the issue and/or	(b) It affects legally sensitive areas according to the EIA (Environmental Impact

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
		<ul style="list-style-type: none"> Delays that impact the transfer or delivery to the customer 	(downtime > 5%)			require legal proceedings.	THB per project.	(c) Restoration takes more than 6 months and/or (d) Costs are at least 75% of the	Assessment) or vulnerable groups and/or (c) Construction must be halted for more than 7

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
								Contingency Budget or (e) Resulting in EBITDA falling below the target by \geq 5%.	days or disrupts the entire working process, both short-term and long-term, and/or

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
									(d) It impacts communities adjacent to the project, requiring more than 30 days to resolve and/or

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
									(e) It results in compensation costs exceeding 500,000 THB.
3	High	● Project costs	● For on-premise	Data that supports	Matters that:	Employees experience	An accident occurs	It has a severe impact on the	It has an impact on the

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
		exceed the budget by 4-8% • Construction costs exceed the budget by 8-10%	systems, disruption lasts between 12 hours and less than 24 hours	critical business processes is damaged for 1 day in the past.	(a) Result in imprisonment and/or (b) Lead to claims for fines or damages exceeding 1	high dissatisfaction and submit complaints through internal company channels.	resulting in injuries that cause the employee to miss work for no more than 3 days and/or	environment, including: (a) Service must be suspended for 3 to 7 days and/or	community adjacent to the project, (a) Construction must be halted for 3 to 7 days and/or

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
		<ul style="list-style-type: none"> Delay in the project schedule ranging from 14 to 28 days 	<ul style="list-style-type: none"> For cloud systems and connectivity, disruption lasts between 16 minutes per 		million THB and/or (c) Involve the revocation of a license that is not the primary		property damage valued between 100,000 - 500,000 THB per project.	(b) Significant resources and time (15 to 30 days) are required to resolve the issue and/or	(b) More than 14 days are required to resolve the issue or it affects certain aspects of the short-term

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
			day and 72 minutes per day (downtime 1.1-5%)		license for business operations.			(c) Restoration takes 1 to 6 months and/or (d) Costs exceed 50%-75%	and long-term work processes and/or (c) Compensation costs range from 100,000

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
								of the Contingency Budget or (e) Resulting in EBITDA falling below the target by 3-4.99%.	to 500,000 THB.

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
2	Medium	<ul style="list-style-type: none"> Project costs exceed the budget by 2-4% Construction costs 	<ul style="list-style-type: none"> For on-premise systems, disruption lasts between 6 hours but 	Data that supports critical business processes is damaged,	Matters that (a) Result in claims for fines or damages ranging from 100,000 THB	Employees experience dissatisfaction and it is necessary to involve the central	An accident occurs resulting in minor injuries that do not require time	It has a moderate impact on the environment, (a) Service must be suspended	It has an impact on the community adjacent to the project, including:

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
		exceed the budget by 4-8% • Delay in the project schedule ranging from 7 to	less than 12 hours. • For cloud systems and connectivity, disruption lasts	specifically data from the day that was not backed up.	to no more than 1 million THB and/or (b) Involve being summoned or	department (HR) to resolve the issue.	off work and/or property damage valued at no more than 100,000	for less than 3 days and/or (b) Resources and time required to resolve the issue range from 7 days to	(a) Construction must be halted for less than 3 days and/or (b) The issue can be

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
		less than 14 days	between 1.45 minutes per day and 15 minutes per day (downtime 0.1-1.0%)		investigated by a government agency.		THB per project.	less than 15 days and/or (c) Restoration takes 1 week to 1 month and/or (d) Costs range from 25% to 50% of the	resolved within 7-14 days or affects certain aspects of the short-term work

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
								Contingency Budget or (e) Resulting in EBITDA falling below the target by 2-2.99%.	processes and/or (c) Compensation costs are less than 100,000 THB.

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
1	Low	<ul style="list-style-type: none"> Project costs exceed the budget by $\leq 2\%$ Construction costs exceed the 	<ul style="list-style-type: none"> For on-premise systems, disruption lasts less than 6 hours 	Data that supports critical business processes is damaged, specifically	Matters that (a) Result in claims for fines or damages not exceeding	Employees and workers experience dissatisfaction, but the issue can be managed and resolved	An event occurs that almost results in an accident, which could have impacted	It has a minimal impact on the environment, (a) No need to suspend services and/or (b) The issue can be	It has an impact on the community adjacent to the project, including: (a) No need to halt

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
		budget by 4% • Delay in the project schedule is less than 7 days	• For cloud systems and connectivity, disruption lasts less than 1.45 minutes per	y data from the past 10 minutes that was not backed up.	100,000 THB and/or (b) Involve receiving a warning from an external party or a	within the department.	employees, workers, and/or project assets, potentially causing	resolved in less than 7 days and/or (c) Restoration takes no more than 1 week and/or	construction and/or (b) The issue can be resolved within 7 days or has only a minor impact

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
			day (downtime < 0.1%).		government agency.		damage to the project.	(d) Costs are less than 25% of the Contingency Budget or (e) Resulting in EBITDA falling below the	on the process and/or (c) No compensation costs are incurred.

Measuring the Severity of Impact (continued)									
Level	Description	Project Management	Information Technology System		Laws, regulations, and various rules	Employee	Safety Occupational Health	Environment	Local Community
			System disruption	Data damage	Damage that can be quantified in monetary terms or is subject to legal penalties.				
								target by \leq 2%.	

Risk Level

Risk Level	Abbreviation	Description
Very High	VH	A risk level that is unacceptable. Immediate action is required to manage the risk to an acceptable level.
High	H	A risk level that is unacceptable. Actions must be taken to reduce the risk to an acceptable level.
Medium	M	A risk level that is acceptable but needs control to prevent it from escalating to an unacceptable level.
Low	L	A risk level that is acceptable without further management.

Risk Map

For the purpose of risk prioritization, to determine whether the assessed risk falls under the categories of very high (red), high (orange), medium (yellow), or low (green) risk.

ผลกระทบ (Impact)	สูงมาก (4)	สูง	สูง	สูงมาก	สูงมาก
	สูง (3)	ปานกลาง	สูง	สูงมาก	สูงมาก
	ปานกลาง (2)	ต่ำ	ปานกลาง	สูง	สูง
	ต่ำ (1)	ต่ำ	ต่ำ	ปานกลาง	สูง
		ต่ำ (1)	ปานกลาง (2)	สูง (3)	สูงมาก (4)
ความเป็นไปได้ - โอกาสเกิด/ความถี่ (Likelihood)					

Risk Management Approaches

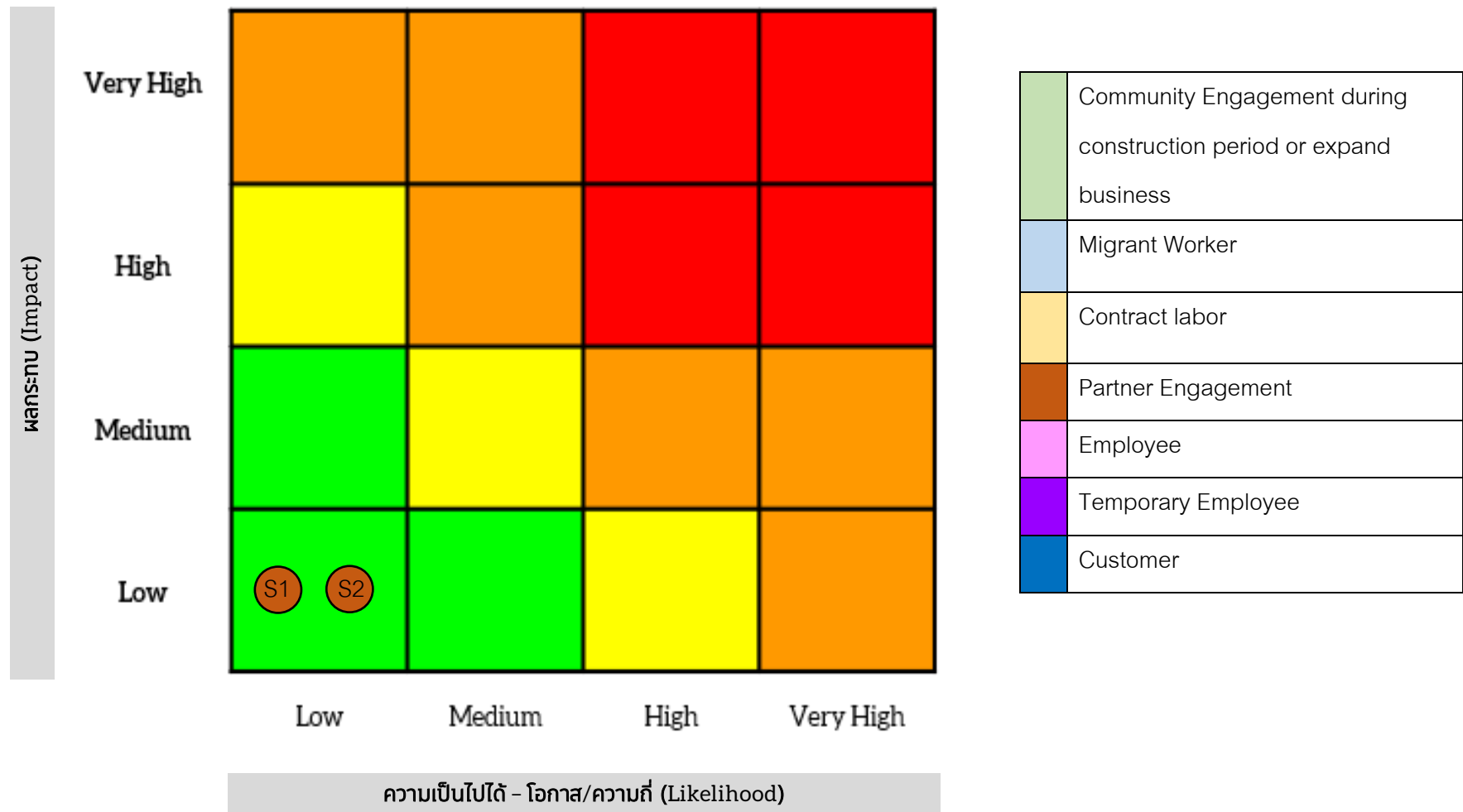
- **Avoidance:** This involves taking action to avoid events that create risks. It is typically used when the risk is severe and there is no feasible way to reduce or manage it to an acceptable level.
- **Sharing:** This involves transferring or sharing all or part of the risk with an external party or organization to help bear the burden, such as by purchasing insurance.
- **Reduction:** This involves implementing measures to reduce the likelihood of risk events occurring or minimizing the impact of potential risks to an acceptable level. For example, preparing a contingency plan.
- **Acceptance:** This refers to accepting the residual risk that remains at an acceptable level without further action to reduce the probability or impact. It is often used when the cost of mitigation measures outweighs the benefits.
- **Pursuit:** This involves taking action to address an increasing risk, but it is important to ensure that the risk does not exceed the acceptable threshold.

6.3.3 Risk Ranking

Human rights risk issues identified and the Company's approaches – Self-managed hotels

	Human Rights Issues	Impact (1 - 4)	Likelihood (1 - 4)	Company's Mitigation Measures
S1	Partner Engagement: Are products being manufactured within the hotel? Are products being manufactured and sold by the suppliers?	1	1	Inspect the supplier's production process to ensure product safety, legal compliance, and adherence to the Business Partner Code of Conduct.
S2	Partner Engagement: Has there been an inspection in the suppliers' factory that produce goods to ensure that such factory follows local human rights principles and labor laws where the factory is situated?	1	1	

Risk Map of Human Rights Risks of Self-managed Hotels



6.4 Remediation and Remedy

The company has established a whistleblowing channel to receive complaints and report any violations and/or disrespect for human rights. The company handles this as follows:

6.4.1 Preparing for potential human rights risks

1. Develop a human rights policy to serve as a guideline.
2. Prepare a risk management plan for potential incidents, such as disasters and pandemics.
3. Ensure sufficient safety equipment for the number of employees working to reduce potential risks.

6.4.2 Handling human rights violations if they occur

1. Ensure a fair investigation process.
2. Require the wrongdoer to apologize to the victim.
3. Assess the physical and mental injuries of the victim.
4. Provide medical treatment and/or psychological counseling until recovery as determined by the relevant medical professionals.
5. Facilitate access to legal remedies in accordance with the laws and regulations of the country.
6. Protect the victim by separating them from the violator or escorting them to a safe area or welfare agency as appropriate.

7. Appendix

Foreign Employee Interviews

Self-managed hotels in Thailand

The results of the inspection and interviews with Thai workers employed at SAii Phi Phi Island Village (SPP) are summarized as follows:

Topic	Inspection Findings
1. Working Conditions and Benefits	All SPP employees have signed official employment contracts. No contracts have been altered after employment. Employees receive legal benefits such as annual health check-ups, sick leave, maternity leave, and annual leave. There have been no complaints regarding working conditions or benefits.
2. Employment	SPP does not use labor agents; all recruitment is handled directly by the HR department through job postings. Temporary employees, such as waitstaff, are hired as needed and paid according to agreed terms and at least the legal minimum wage. There have been no complaints about discrimination. Both local Thai workers and foreign employees (e.g., musicians from Southeast Asia) are employed based on job requirements, experience, skills, and suitability, without exclusion or discrimination. There have been no complaints regarding employment practices.
3. Working Environment	Overall, SPP provides a safe working environment with adequate lighting. Work areas such as the kitchen and laundry room have good ventilation. Equipment, including machines like washing machines and chemical dispensers, is regularly inspected by

	suppliers. There have been no complaints regarding the working environment.
4. Occupational Health, Safety, and Facilities	Safety and cleanliness are maintained with designated personnel. Safety equipment such as fire extinguishers and fire alarms are installed at key locations. Staff accommodations have been improved for cleanliness, and waste is sorted in both work zones and dormitories. Electrical systems meet Thai Industrial Standards (TIS), and water filtration systems are in place. However, employees are required to conserve water during the dry season due to limited supply. There have been no complaints regarding health, safety, or facilities.
5. Protection of Personal Data of Employees and Guests	Employees' personal data is stored in locked cabinets in the HR department, accessible only by the HR Director. All employees have signed the PDPA consent form. SPP has defined employee rights regarding data access, and only authorized staff may access confidential personal data of employees and guests. There have been no complaints regarding personal data collection or usage. Guests are informed about the presence of CCTV for security purposes via signage at check-in and throughout areas where cameras are installed.
6. Treatment of Foreign Workers in Thailand	Foreign workers at SPP receive fair wages and benefits, and contracts are written in English, complying with Thai labor laws. There is no discrimination. Foreign employees retain freedom of movement, the right to provide feedback and form

	groups, and their passports are not confiscated. No additional fees are charged, nor are there any unfair wage deductions. There have been no complaints from foreign workers.
7. Community Engagement	The hotel provides opportunities for local communities to participate in social activities, such as organizing Children's Day events, mangrove reforestation, crab releases, merit-making for monks, and donations of dry food and secondhand clothes to the Urak Lawoi community. There have been no complaints from local communities.
8. Complaints and Remediation	There have been no complaints or cases requiring remediation.

The results of the inspection and interviews with Thai workers employed at SAii Laguna Phuket (SLP) are summarized as follows:

Topic	Inspection Findings
1. Working Conditions and Benefits	All employees have signed employment contracts and receive legally entitled benefits such as sick leave and annual leave. Employees can consult the HR staff if they have questions regarding their employment contracts. All employees are treated equally, with no discrimination, and diversity is respected. There have been no complaints regarding working conditions or benefits.
2. Employment	Employment at SLP complies with legal requirements. Standard employment contracts are provided in both Thai and English. All employees undergo a fair recruitment process without discrimination, and written

	contracts specify wages according to the law and the benefits entitled. Employees are entitled to overtime pay and other benefits such as access to medical care. There have been no complaints regarding employment.
3. Working Environment	Overall, SLP provides a safe working environment with adequate lighting. Workplaces such as kitchens are equipped with machinery that is regularly inspected by suppliers (e.g., washing machines and chemical dispensers). However, the sewing room is quite small. SLP may consider relocating this workspace for the staff sewing bags from curtains. There have been no complaints regarding the working environment.
4. Occupational Health, Safety, and Facilities	Dedicated personnel are responsible for safety and cleanliness. Occupational health and safety measures are in place, along with safety and cleaning equipment. Security systems include key cards, fire alarms, emergency exits, and CCTV. Regular staff training and annual fire drills are conducted. There have been no complaints regarding health, safety, or facilities.
5. Protection of Personal Data of Employees and Guests	All personal data of both employees and guests is securely stored. SLP has defined employee rights regarding data access and ensures confidentiality. Only authorized personnel may access this information. There have been no complaints regarding the collection or use of personal data.
6. Treatment of Foreign Workers in Thailand	Foreign workers at SLP receive fair wages and benefits. Contracts are provided in English and

	comply with Thai labor laws. There is no discrimination or exclusion. Foreign employees have the freedom of movement, the right to provide feedback, and to associate freely. Their passports are not confiscated, and they are not subject to extra charges or unfair salary deductions. There have been no complaints from foreign workers.
7. Community Engagement	The hotel provides opportunities for the local community to participate in social and religious activities, such as organizing Children's Day events, participating in mangrove reforestation with the Khlong Kian community in Phang Nga, releasing sea turtles, making merit, and donating blood. There have been no complaints from the surrounding community.
8. Complaints and Remediation	There have been no complaints or remediation cases.

The results of the inspection and interviews with Thai and foreign workers employed at Santiburi Koh Samui (STB) are summarized as follows:

Topic	Inspection Findings
1. Working Conditions and Benefits	All employees have signed employment contracts and receive legally entitled benefits such as sick leave and annual leave. In case of questions regarding the contract, employees can consult the HR staff. All employees are treated equally and respectfully. Employees who stay in company-provided dormitories receive a monthly utility allowance. There have been no complaints regarding working conditions and benefits.

2. Employment	Employment practices comply with the law. All employees undergo a non-discriminatory recruitment process and sign contracts that specify wages, overtime pay, and entitled benefits, including access to medical care. There have been no complaints regarding employment.
3. Working Environment	Overall, STB provides a safe working environment with adequate lighting. Workplaces such as kitchens, laundry, and linen storage areas are equipped with machinery regularly inspected by suppliers, such as washing machines and chemical dispensers. There have been no complaints regarding the working environment.
4. Occupational Health, Safety, and Facilities	Designated personnel are responsible for safety and cleanliness and are certified. Safety measures and equipment are in place, including fire alarms at key points, emergency exits, and CCTV. Staff are regularly trained, and annual fire drills are conducted. There have been no complaints regarding safety, health, or facilities.
5. Protection of Personal Data of Employees and Guests	All personal data of employees and guests is securely stored. STB has defined employee access rights and confidentiality protocols for personal data. Only authorized staff can access such information. There have been no complaints regarding the collection or use of personal data.
6. Treatment of Foreign Workers in Thailand	Foreign workers at STB receive fair wages and benefits. Employment contracts are in English and comply with Thai labor laws. There is no discrimination

	or exclusion. Foreign workers have the freedom of movement, the right to provide feedback and to form associations. Their passports are not confiscated, and there are no extra charges or unfair wage deductions. There have been no complaints from foreign workers.
7. Community Engagement	The hotel provides opportunities for the community to participate in social and religious activities within the hotel premises, such as offering alms to monks and blood donation drives. There have been no complaints from surrounding communities.
8. Complaints and Remediation	There have been no complaints or cases requiring remediation.

The results of the inspection and interviews with Thai workers employed at SAii Koh Samui Villas (SKS) are summarized as follows:

Topic	Inspection Findings
1. Working Conditions and Benefits	All employees have signed employment contracts and receive benefits such as sick leave and annual leave according to the law. Daily wage workers, especially Thai workers responsible for cleaning, receive at least the legal minimum wage but do not receive the same benefits as regular employees. Daily workers are fully compensated according to their contracts. Employees can consult HR with any contract questions. All employees are treated equally and with respect. There have been no complaints regarding working conditions and benefits.
2. Recruitment and Employment	Employment complies with the law. All employees undergo a non-discriminatory selection process and

	<p>sign contracts specifying wages, overtime pay, and other entitled benefits such as medical care. Some positions, such as cleaning staff during renovations, are hired as temporary workers who receive legal wages but not regular employee benefits due to the short-term nature of their work. There have been no complaints regarding recruitment and employment.</p>
3. Working Environment	<p>Working hours comply with the law. Employees have the right to express opinions freely without discrimination and are treated with respect. There is no human rights violation, forced overtime, or forced labor. There have been no complaints regarding the working environment.</p>
4. Occupational Health, Safety, and Facilities	<p>There is a safety officer and cleanliness is certified. Safety measures and equipment are complete. The premises have key card access, fire alarms at various points, emergency exits, and CCTV. Regular employee training and annual fire drills are conducted. A first aid room is under construction and expected to be operational in 2025. There have been no complaints regarding health, safety, or facilities.</p>
5. Protection of Personal Data of Employees and Guests	<p>All personal data of employees and guests are securely stored. SKS has defined employee rights to access information and confidentiality of personal data, accessible only by authorized staff. There have been no complaints regarding data storage or use.</p>
6. Treatment of Foreign Workers in Thailand	<p>SKS does not employ foreign workers. However, contracts are provided in English and comply with Thai labor law. There is no discrimination. Workers</p>

	have freedom of movement, the right to provide feedback, and to associate freely. There have been no complaints from foreign workers.
7. Community Engagement	Activities include cleaning Chaweng Beach, releasing crabs on the island's beaches, cleaning the Paeng Bua temple grounds on Koh Samui, and donating clothes to the local police station.
8. Complaints and Remediation	There have been no complaints or remediation cases.

Self-managed hotels in Maldives

The results of the human rights inspection and interviews with foreign workers working at CROSSROADS (The Marina @ CROSSROADS, SAii Lagoon Maldives and Hard Rock Hotel Maldives) are summarized as follows:

Topic	Inspection Findings
1. Working Conditions and Benefits	All employees sign employment contracts in English and receive legal rights and benefits such as sick leave and annual leave. Employees can consult HR if they have questions regarding contracts. Working hours comply with the law. Employees receive equal benefits and can travel outside the Maldives during holidays. All employees are treated equally and with respect. There have been no complaints regarding working conditions and benefits, and no recruitment fees are charged.
2. Recruitment and Employment	Employees learn about job opportunities from various channels, such as friends and job websites. Employment complies with the law. All employees sign contracts and undergo non-discriminatory selection. Promotion involves additional documentation. No recruitment fees are charged to employees.

	<p>Employees are treated fairly, without discrimination, and feel respected by colleagues and management. Employment contracts are clear, in English, and the recruitment process is fair, without discrimination based on race, gender, or nationality. Employees are clearly informed of employment conditions and benefits. There have been no complaints about recruitment and employment.</p>
3. Working Environment	<p>Employees report a generally good working environment despite occasional heavy workloads. Working hours comply with the law (48 hours per week with at least one day off). Employees can freely express opinions without discrimination and are treated with respect. No human rights violations or forced overtime/labor. Employees can travel freely with approval. They are satisfied with salary, benefits, work conditions, and workplace safety. Some employees share dorm rooms (2 per room), allocated by management, with good conditions and a feeling of safety both at work and in accommodations.</p>
4. Occupational Health, Safety, and Facilities	<p>The work environment is safe. Employees have standard work equipment. Fire drills are conducted annually. Safety officers maintain cleanliness and safety equipment. Security includes key card access, fire alarms, and CCTV, all inspected regularly. Staff receive regular training, including fire drills. Employee dormitories are in good condition with emergency exits and security for both accommodations and workplaces. There have been no serious injuries or deaths. A first aid room is equipped with basic</p>

	supplies. There have been no complaints regarding safety, health, or facilities.
5. Protection of Personal Data of Employees and Guests	All employee and guest data is securely stored. Access rights and confidentiality protocols are strictly defined, allowing access only to authorized personnel. There have been no complaints about data handling.
6. Treatment of Foreign Workers in the Maldives	Foreign workers at CXR, SLM, and HRH receive fair wages and benefits in compliance with labor laws. There is no discrimination or complaints from foreign workers. Workers have freedom of movement, passports are not confiscated, and no extra fees or unfair salary deductions occur. There have been no complaints from foreign workers.
7. Community Engagement	The hotels provide opportunities for local communities to participate in social and religious activities such as Eid al-Fitr celebrations and Ramadan and donate TVs to schools in the Maldives. There have been no complaints from surrounding communities.
8. Complaints and Remediation	There have been no complaints or cases requiring remediation.