



# Human Rights Due Diligence (HRDD) Report 2025

S HOTELS & RESORTS PUBLIC COMPANY LIMITED

Reported by

Sustainability Development Division, Operations Department

## Table of Contents

|                                                                                              |    |
|----------------------------------------------------------------------------------------------|----|
| 1. Introduction .....                                                                        | 1  |
| 2. Goal and Objective .....                                                                  | 1  |
| 3. Scope .....                                                                               | 1  |
| 4. Definition.....                                                                           | 3  |
| 5. Roles and Responsibilities .....                                                          | 4  |
| 6. Human Rights Risk and Impact Assessment Process .....                                     | 6  |
| 6.1 Policy Commitment.....                                                                   | 6  |
| 6.2 Assessment of Actual or Potential Impacts .....                                          | 7  |
| 6.3 Integration of Policies with Assessments, Including Internal and External Controls ..... | 8  |
| 6.3.1 Human Rights Identification .....                                                      | 8  |
| 6.3.2 Risk Assessment.....                                                                   | 10 |
| 6.3.3 Risk Ranking .....                                                                     | 19 |
| 6.4 Remediation and Remedy.....                                                              | 20 |
| 6.4.1 Preparing for potential human rights risks .....                                       | 20 |
| 6.4.2 Handling human rights violations if they occur .....                                   | 20 |

## **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 (UNGPR).

**Table 3.1 Scope of Human Rights**

| Stakeholder Group       | Practices                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Employees Group         | <ul style="list-style-type: none"> <li>● No discrimination against employees</li> <li>● No harassment of employees in any form</li> <li>● No illegal labour</li> <li>● No forced labour in compliance with policies and laws</li> <li>● No child labour in compliance with policies and laws</li> <li>● Maintain occupational health and safety in the workplace</li> </ul> |
| Community Group         | <ul style="list-style-type: none"> <li>● Land acquisition is conducted in compliance with applicable laws</li> <li>● Right of way through designated areas is provided</li> <li>● Waste and hazardous materials are managed in accordance with policies and laws</li> <li>● Operations must not negatively impact community health and safety</li> </ul>                    |
| Customer Group          | <ul style="list-style-type: none"> <li>● Ensure safety and occupational health for customers</li> <li>● Comply with company policies and applicable laws</li> <li>● No harassment of customers in any form</li> <li>● No discrimination against customers</li> </ul>                                                                                                        |
| Business Partners Group | <ul style="list-style-type: none"> <li>● Ensure safety and occupational health for employees of business partners</li> <li>● Comply with company policies and applicable laws</li> <li>● Maintain confidentiality of partners and customers</li> <li>● Develop production and/or service processes with a focus on reducing waste and greenhouse gas emissions</li> </ul>   |

#### 4. Definition

| Word or text                                         | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The Company                                          | <ul style="list-style-type: none"> <li>- S Hotels and Resorts Public Company Limited and its subsidiaries</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Human Rights <sup>1</sup>                            | <ul style="list-style-type: none"> <li>- Natural rights inherent to humans from birth. Every human being has human dignity.</li> <li>- Universality and Inalienability</li> <li>- Inability to be divided and the absence of any right being more significant than another (Indivisibility)</li> <li>- Equality and Non-discrimination</li> <li>- 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.</li> </ul> |
| Sustainability/ Sustainable Development <sup>2</sup> | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

<sup>1</sup> National Human Rights Commission of Thailand, 2019

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

|                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                            | Individuals aged 18 and above are not considered child labor.                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Standard labour/ Forced labor <sup>3</sup> | Compelling individuals to work through coercion, intimidation, detention, threat of delay, abuse, or punishment, without the individual's voluntary consent or willingness.                                                                                                                                                                                                                                                                                                                        |
| Thai worker                                | A person employed by the Company in the Kingdom of Thailand or the Republic of Maldives, who contributes knowledge, skills, expertise, and/or physical labor to achieve the Company's objectives. Employees receive wages or salaries and employment benefits in accordance with applicable laws, employment contracts, and Company policies.                                                                                                                                                      |
| Migrant worker                             | A person who is not a Thai national but is legally employed by the Company in the Kingdom of Thailand or the Republic of Maldives. Migrant workers contribute their knowledge, skills, expertise, and/or physical labor to achieve the Company's objectives. They receive wages or salaries as compensation, together with employment benefits agreed between the employer and employee, including medical benefits, leave entitlements, commissions, overtime pay, and other applicable benefits. |

## 5. Roles and Responsibilities

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

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

## 5.1. Responsible Party

The Human Rights Due Diligence (HRDD) process is jointly governed by the Sustainability Development Division and the Human Resources and Brand Culture Department, in collaboration with relevant operational functions.

Their roles and responsibilities include:

Developing and maintaining procedures for assessing human rights risks and impacts across the organization, in coordination with relevant departments.

- Periodically reviewing and improving the human rights risk and impact assessment procedures to ensure their effectiveness and alignment with evolving business operations and regulatory expectations.
- Monitoring and ensuring the effective implementation of the assessment procedures by relevant departments, including the identification of human rights issues, risk management, and the implementation of appropriate mitigation measures.
- Providing guidance and support to relevant departments to ensure consistent application of the human rights risk and impact assessment process.
- Ensuring that day-to-day implementation of human rights risk and impact assessment activities is carried out by relevant operational functions, including the identification of risks, execution of mitigation measures, and documentation and reporting of findings at the operational level.

## 5.2. Participants in the Human Rights Risk Assessment Process

The Sustainability Development Division and the Human Resources and Brand Culture Department act as the coordinating functions for the Human Rights Risk and Impact Assessment process, responsible for facilitating the process, consolidating inputs, and supporting overall implementation across the organization.

In alignment with the Company's commitment to respect for human rights as part of its sustainability management framework, relevant operational departments participate in the assessment process. These include, but are not limited to, Human Resources, Community

and Government Relations, Supply Chain, Security, Safety, Occupational Health and Environment (SHE), Investment, Analysis and Planning, and Customer Relations.

The participating departments are responsible for:

- Identifying actual and potential human rights risks and impacts within their respective functions and areas of responsibility.
- Assessing the likelihood and severity of identified human rights risks and impacts in accordance with the Company's assessment methodology.
- Implementing appropriate mitigation and control measures to address identified risks and impacts.
- Monitoring the effectiveness of mitigation measures and reporting progress and outcomes.
- Reviewing and updating relevant risk assessment information to ensure accuracy and relevance, particularly when significant operational or contextual changes occur.

## 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 of [Human Rights Policy](#), please visit the Company's website.

In addition, the Company communicates and promotes awareness among its business partners regarding the importance of conducting business with respect for human rights as part of sustainable business practices. This is achieved through initiatives such as the annual Supplier Day, communication of the Company's Supplier Code of Conduct through circular letters, and publication of the [Supplier Code of Conduct](#) on the Company's website. Furthermore, the Company conducts site visits to suppliers' business premises to assess their environmental, social, and governance (ESG) practices. These visits also serve to enhance suppliers' awareness and understanding of the Company's Supplier Code of Conduct and its expectations regarding responsible business conduct.

## **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 organization al 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 associated with its hotel business operations and has categorized the related human rights risks into the following seven key stakeholder groups:

| Stakeholder Group       | Human Rights Risk Areas                                                                                                                                                                                                                                 |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Community Engagement | <ul style="list-style-type: none"><li>● Land management</li><li>● Quality, sufficiency, and access to water sources</li><li>● Cultural impacts</li><li>● Security management</li><li>● Environmental conditions</li><li>● Violation of rights</li></ul> |
| 2. Migrant Workers      | <ul style="list-style-type: none"><li>● Workforce procurement</li><li>● Travel documents / Identification documents</li><li>● Employment conditions</li><li>● Working environment conditions</li></ul>                                                  |
| 3. Contract Labor       | <ul style="list-style-type: none"><li>● Employment</li><li>● Working environment conditions</li><li>● Workplace conditions</li><li>● Contract labour management</li></ul>                                                                               |
| 4. Business Partners    | <ul style="list-style-type: none"><li>● Production processes</li><li>● Working environment conditions</li><li>● Workplace conditions</li><li>● Health and safety</li><li>● Community involvement</li></ul>                                              |
| 5. Employees            | <ul style="list-style-type: none"><li>● Employment</li><li>● Workplace environment</li><li>● Discrimination</li></ul>                                                                                                                                   |

|                        |                                                                                                                                                                       |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                        | <ul style="list-style-type: none"> <li>● Freedom of association and collective bargaining</li> <li>● Discipline and punishment</li> <li>● Employee privacy</li> </ul> |
| 6. Temporary Employees | <ul style="list-style-type: none"> <li>● Employment</li> <li>● Workplace environment</li> <li>● Discrimination</li> </ul>                                             |
| 7. Customers           | <ul style="list-style-type: none"> <li>● Room reservation</li> <li>● Safety</li> <li>● Discrimination</li> <li>● Data protection and privacy</li> </ul>               |

### 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 e 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 |             |                                                                                                                                                                                                                                                                       |                                                          |                                                                                        |                                                                                                       |                                                                                                                                                                                                                                 |                                                                                                   |
|----------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| Level                            | Description | Corporate strategy                                                                                                                                                                                                                                                    | Finance                                                  | Reputation and Image                                                                   |                                                                                                       |                                                                                                                                                                                                                                 | Business Operations                                                                               |
|                                  |             |                                                                                                                                                                                                                                                                       |                                                          | Customer Satisfaction                                                                  | Affected Parties                                                                                      | Litigation/Complaints                                                                                                                                                                                                           |                                                                                                   |
| 4                                | Very High   | <b>Severe impact on corporate strategy:</b> 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        | <b>Significant impact on corporate strategy:</b> Requires partial changes to strategies and goals in both the short and long term. Organizational adjustments to align with the new strategy can be implemented within one year.                                      | EBITDA falls short of the target by 3% but less than 5%. | Customer satisfaction level decreases by 5% to 10% from the established benchmark.     | It has an impact on multiple departments or affects the management or executive team.                 | Complaints on social media both internally and externally.                                                                                                                                                                      | Impact on the operations of some hotels/projects, causing a disruption lasting from 1 to 2 weeks. |

| 2                                            | Medium      | Impact on short-term strategies and goals: The organization can adjust its strategies to align with changing circumstances within 3–6 months.                                                                                           | EBITDA falls short of the target by 2% but less than 3%.                                                                                                                          | Customer satisfaction level decreases by 3% to 5% from the established benchmark.          | It has an impact limited to a specific department or within a particular division.      | Complaints on the company's social media, not yet released to external media, and can be resolved within 1-3 days.                                        | Impact on the operations of some hotels/projects, causing a disruption of less than one week.                                                 |                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                           |
|----------------------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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.                              |                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                           |
| 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"><li>Project costs exceed the budget by <math>\geq 8\%</math></li><li>Construction costs exceed the budget by <math>&gt; 10\%</math></li><li>Delay in the project schedule exceeding 28 days</li></ul> | <ul style="list-style-type: none"><li>For on-premise systems, disruption lasting more than 24 hours</li><li>For cloud systems and connectivity, disruption exceeding 72</li></ul> | Data that supports critical business processes is damaged for more than 1 day in the past. | 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, leading to a disruption in business operations or the emergence of | An accident occurs resulting in injuries that cause the employee to miss work for more than 3 days and/or property damage valued at more than | It has a severe impact on the environment,(a) Service must be suspended for more than 7 days and/or (b) Significant resources and time (more than 30 days) are required | (a) It has a wide impact on the community within a 100-meter radius from the project and/or (b) It affects legally sensitive areas according to the EIA (Environmental Impact Assessment) or vulnerable groups and/or (c) Construction must be halted for more than 7 days or disrupts the entire working |

| Measuring the Severity of Impact (continued) |             |                                                                                                                                                  |                                                                                                                                                                   |                                                                                  |                                                                                                                                                                         |                                                                                                    |                                                                                                                                     |                                                                                                                                                                                                               |                                                                                                                                                                                                                    |
|----------------------------------------------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Level                                        | Description | Project Management                                                                                                                               | Information Technology System                                                                                                                                     |                                                                                  | Laws, regulations, and various rules                                                                                                                                    | Employee                                                                                           | Safety<br>Occupational<br>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"> <li>Delays that impact the transfer or delivery to the customer</li> </ul>                                    | minutes per day (downtime > 5%)                                                                                                                                   |                                                                                  |                                                                                                                                                                         | disputes that require legal proceedings.                                                           | 500,000 THB per project.                                                                                                            | to resolve the issue and/or<br>(c) Restoration takes more than 6 months and/or<br>(d) Costs are at least 75% of the Contingency Budget or<br>(e) Resulting in EBITDA falling below the target by $\geq 5\%$ . | process, both short-term and long-term, and/or<br>(d) It impacts communities adjacent to the project, requiring more than 30 days to resolve and/or<br>(e) It results in compensation costs exceeding 500,000 THB. |
| 3                                            | High        | <ul style="list-style-type: none"> <li>Project costs exceed the budget by 4-8%</li> <li>Construction costs exceed the budget by 8-10%</li> </ul> | <ul style="list-style-type: none"> <li>For on-premise systems, disruption lasts between 12 hours and less than 24 hours</li> <li>For cloud systems and</li> </ul> | Data that supports critical business processes is damaged for 1 day in the past. | Matters that:<br>(a) Result in imprisonment and/or<br>(b) Lead to claims for fines or damages exceeding 1 million THB and/or<br>(c) Involve the revocation of a license | Employees experience high dissatisfaction and submit complaints through internal company channels. | An accident occurs resulting in injuries that cause the employee to miss work for no more than 3 days and/or property damage valued | It has a severe impact on the environment, including:<br>(a) Service must be suspended for 3 to 7 days and/or<br>(b) Significant resources and time                                                           | It has an impact on the community adjacent to the project, (a) Construction must be halted for 3 to 7 days and/or<br>(b) More than 14 days are required to resolve the issue or it affects certain aspects of 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. |                                                                                 |                                                                             |                                                                                                                                                                                                                                 |                                                                                                             |
|                                              |             | <ul style="list-style-type: none"> <li>Delay in the project schedule ranging from 14 to 28 days</li> </ul>                                      | connectivity, disruption lasts between 16 minutes per day and 72 minutes per day (downtime 1.1-5%)   |                                                            | that is not the primary license for business operations.                          |                                                                                 | between 100,000 - 500,000 THB per project.                                  | (15 to 30 days) are required to resolve the issue and/or<br>(c) Restoration takes 1 to 6 months and/or<br>(d) Costs exceed 50%-75% of the Contingency Budget or<br>(e) Resulting in EBITDA falling below the target by 3-4.99%. | short-term and long-term work processes and/or<br>(c) Compensation costs range from 100,000 to 500,000 THB. |
| 2                                            | Medium      | <ul style="list-style-type: none"> <li>Project costs exceed the budget by 2-4%</li> <li>Construction costs exceed the budget by 4-8%</li> </ul> | <ul style="list-style-type: none"> <li>For on-premise systems, disruption lasts between 6</li> </ul> | Data that supports critical business processes is damaged, | Matters that<br>(a) Result in claims for fines or damages ranging from 100,000    | Employees experience dissatisfaction and it is necessary to involve the central | An accident occurs resulting in minor injuries that do not require time off | It has a moderate impact on the environment,                                                                                                                                                                                    | 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<br>Occupational<br>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"> <li>Delay in the project schedule ranging from 7 to less than 14 days</li> </ul> | hours but less than 12 hours.<br><ul style="list-style-type: none"> <li>For cloud systems and connectivity, disruption lasts between 1.45 minutes per day and 15 minutes per day (downtime 0.1-1.0%)</li> </ul> | specifically data from the day that was not backed up. | THB to no more than 1 million THB and/or<br><b>(b)</b> Involve being summoned or investigated by a government agency. | department (HR) to resolve the issue. | work and/or property damage valued at no more than 100,000 THB per project. | <b>(a)</b> Service must be suspended for less than 3 days and/or<br><b>(b)</b> Resources and time required to resolve the issue range from 7 days to less than 15 days and/or<br><b>(c)</b> Restoration takes 1 week to 1 month and/or<br><b>(d)</b> Costs range from 25% to 50% of the Contingency Budget or<br><b>(e)</b> Resulting in EBITDA falling below the target by 2-2.99%. | <b>(a)</b> Construction must be halted for less than 3 days and/or<br><b>(b)</b> The issue can be resolved within 7-14 days or affects certain aspects of the short-term work processes and/or<br><b>(c)</b> 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"> <li>Project costs exceed the budget by <math>\leq 2\%</math></li> <li>Construction costs exceed the budget by 4%</li> <li>Delay in the project schedule is less than 7 days</li> </ul> | <ul style="list-style-type: none"> <li>For on-premise systems, disruption lasts less than 6 hours</li> <li>For cloud systems and connectivity, disruption lasts less than 1.45 minutes per day (downtime &lt; 0.1%).</li> </ul> | Data that supports critical business processes is damaged, specifically data from the past 10 minutes that was not backed up. | <p>Matters that</p> <p>(a) Result in claims for fines or damages not exceeding 100,000 THB and/or</p> <p>(b) Involve receiving a warning from an external party or a government agency.</p> | Employees and workers experience dissatisfaction, but the issue can be managed and resolved within the department. | An event occurs that almost results in an accident, which could have impacted employees, workers, and/or project assets, potentially causing damage to the project. | It has a minimal impact on the environment, (a) No need to suspend services and/or (b) The issue can be resolved in less than 7 days and/or (c) Restoration takes no more than 1 week and/or (d) Costs are less than 25% of the Contingency Budget or (e) Resulting in EBITDA falling below the target by $\leq 2\%$ . | It has an impact on the community adjacent to the project, including: (a) No need to halt construction and/or (b) The issue can be resolved within 7 days or has only a minor impact on the process and/or (c) No compensation costs are incurred. |

### 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.

|            |               |         |            |           |               |
|------------|---------------|---------|------------|-----------|---------------|
| Impact     | Very High (4) | High    | High       | Very High | Very High     |
|            | High (3)      | Medium  | High       | Very High | Very High     |
|            | Medium (2)    | Low     | Medium     | High      | High          |
|            | Low (1)       | Low     | Low        | Medium    | High          |
|            |               | Low (1) | Medium (2) | High (3)  | Very High (4) |
| 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

| No. | Human Rights Issues                                                                                                                                                                                                | Impact<br>(1 - 4) | Likelihood<br>(1 - 4) | Company's Mitigation Measures                                                                                                                |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| 1   | <b>Business Partner:</b> 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. |
| 2   | <b>Business Partner:</b> 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                     |                                                                                                                                              |

|        |                  |            |               |             |                  |
|--------|------------------|------------|---------------|-------------|------------------|
| Impact | Very High<br>(4) | High       | High          | Very High   | Very High        |
|        | High<br>(3)      | Medium     | High          | Very High   | Very High        |
|        | Medium<br>(2)    | Low        | Medium        | High        | High             |
|        | Low<br>(1)       | 1 2        | Low           | Medium      | High             |
|        |                  | Low<br>(1) | Medium<br>(2) | High<br>(3) | Very High<br>(4) |
|        |                  | Likelihood |               |             |                  |

## **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.