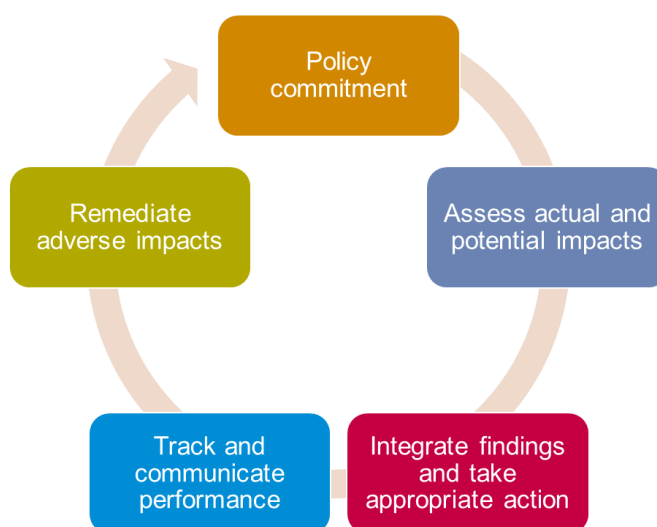


## Human Rights

True Group’s responsibilities as a telecommunication service provider, apart from delivering quality products and services to consumers, is to promote equal opportunities for access to information, content, and ICT services. In doing so, the Company must conduct business with ethics and moral principles, recognizing the dignity and value of every human being. True Group operates with respect for human rights of all stakeholders. Reflecting the Company’s policy on equal opportunities, True Group strive to achieve diversity in the workplace with measures to ensure equal treatment and human rights protection, regardless of gender, age, education, nationality, ethnicity, skin color, religion, sexual identity and disability status.

### Human Rights Due Diligence Process

True Group’s Human Rights Due Diligence process is an on-going process. The Group does a systematic periodic review of the risk mapping of potential and actual human rights issues, every 2 years. The Due Diligence process applies to all of True Group’s business activities and associated activities (e.g. network operations, office activities) within the value chain, where potential human rights impacts and/or risks may exist. The scope of assessment includes our own operations and extends to our business partners, suppliers and contractors, and new business relations (i.e. joint ventures, mergers and acquisitions).



Reference: UN Guiding Principles on Business and Human Rights

### **1. Policy commitment**

Through True Group’s Human Rights Policy, the Group commits to adhere to human rights principles in accordance with international standards which are the United Nations Universal Declaration of Human Rights (UNDHR), the United Nations’ Guiding Principles on Business and Human Rights (UNGPR), United Nations Global Compact, and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. The policy expects that all relevant stakeholders of True Group comply with its human rights commitments; the scope covers its own operations, suppliers, contractors, business partners and extending the coverage to business relations i.e. joint ventures, mergers and acquisitions.

Moreover, True Group has implemented a system to track, monitor and assess human rights risks as well as ensuring that all stakeholders have access to our whistleblowing and complaint channels. These processes will provide us with feedbacks and inputs for further improvement of our due diligence process, and for our reporting of human rights performances.

## **2. Assess actual and potential impacts**

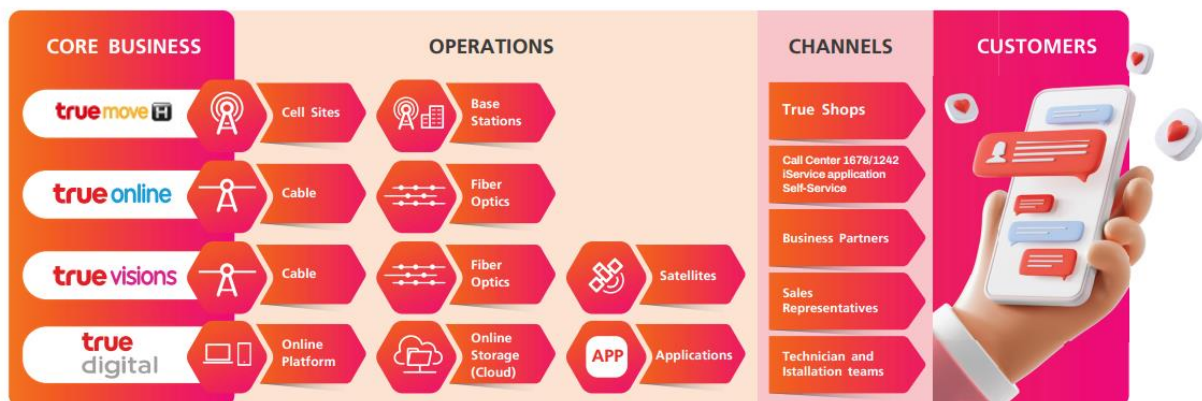
True Group’s Human Rights due diligence and risk assessment processes covered 100% of own operation and relevant stakeholders throughout the value chains, including vulnerable groups that are at-risks of being impacted by our operations.

### **Human rights risk assessment**

As an on-going risk management process, True group executes the human rights due diligence process to identify, prevent, mitigate and account for how the company addresses its adverse human rights impacts and risks from its activities and business relationships throughout value chain. As part of the process, True Group conducted human rights risk assessment, which covered 100% the company’s operations subsidiaries and relevant stakeholders throughout value chain – both internal (e.g. employees) and external stakeholders (e.g. suppliers, contractors, communities, customers and business relations including joint ventures, mergers, and acquisitions), as well as vulnerable groups (i.e. women, pregnant women, children, indigenous people, migrant labor, third-party contracted labor, LGBTQI+, and elderly) – that may be or have been impacted by its activities.

The Human Rights risk assessment covers actual and potential human rights issues relating to forced labor, human trafficking, child labor, freedom of association, right to collective bargaining, equal remuneration, discrimination and other rights including employee health and safety, working conditions, community health and safety and standard of living, cybersecurity and data privacy.

### **Scope of True Group Human Rights Risks Assessment: True Value Chain**



## Methodology

Our human rights risk assessment process include the steps as follows:

### 1. Identification of Human Rights Issues:

- a. Identifying all relevant human rights issues related to True Group’s business activities in the value chain.
- b. Identifying affected rights holders (e.g. employees, communities, customers) and vulnerable groups (i.e. women, pregnant women, children, indigenous people, migrant labor, third-party contracted labor, LGBTQI+, and elderly)

Through screening of human rights issues that are relevant to True Group’s business activities and value chain, we reviewed peer benchmarking of similar industries/sectors and various international benchmarking resources. The scope of relevant human rights issues for True Group’s in 2022, as shown below:

Employees Rights	Community Rights	Customers Rights	Suppliers Rights
<ul style="list-style-type: none"> <li>• Health and safety of products and services to customer</li> <li>• Discrimination</li> <li>• Data privacy (employee/customer/partner)</li> <li>• Misleading marketing/Unfair marketing practices towards consumers</li> <li>• Cybersecurity</li> <li>• Freedom of association</li> <li>• Illegal employment practices</li> <li>• Freedom of expression</li> <li>• Working conditions</li> <li>• Occupational health and safety</li> </ul>	<ul style="list-style-type: none"> <li>• Health and safety of products and services to community</li> <li>• Discrimination</li> <li>• Data privacy</li> <li>• Misleading marketing/Unfair marketing practices towards consumers</li> <li>• Cybersecurity</li> <li>• Responsibility in selecting and presenting appropriate and safe content</li> </ul>	<ul style="list-style-type: none"> <li>• Health and safety of products and services to customer</li> <li>• Discrimination</li> <li>• Data privacy</li> <li>• Misleading marketing/Non-transparent marketing</li> <li>• Cybersecurity</li> <li>• Responsibility in selecting and presenting appropriate and safe content</li> </ul>	<ul style="list-style-type: none"> <li>• Health and safety of products and services to customer</li> <li>• Discrimination</li> <li>• Data privacy (employee/customer/partner)</li> <li>• Misleading marketing/Unfair marketing practices towards consumers</li> <li>• Cybersecurity</li> <li>• Freedom of association</li> <li>• Illegal employment practices</li> <li>• Freedom of expression</li> <li>• Working conditions</li> <li>• Occupational health and safety</li> </ul>

### 2. Risk Rating: our risks ratings consider the criteria scale of severity and likelihood (see below for more information).

- a. Inherent Risk Rating: are human rights risks that did not take into consideration any existing measures or controls True Group’s may have.
- b. Residual Risk Rating: are human right risks after considering the existing measures and controls. High residual risks are considered human rights salient issues, in which require implementation of additional measures.

## Human Rights Risks Assessment Matrix

The assessment of human rights risk level will be conducted using a matrix below to determine the significance of the human rights, where the Axis-X is the level of likelihood and Axis-Y is the level of severity.

### Risk Rating Scale

<b>Severity</b>	Critical	High	High	High	High	High
	Serious	Medium+	Medium+	Medium+	High	High
	Moderate	Medium	Medium	Medium+	Medium+	Medium+
	Minor	Low	Medium	Medium	Medium	Medium
	Insignificant	Low	Low	Low	Medium	Medium
		Rare	Unlikely	Possible	Likely	Almost Certain
		<b>Likelihood</b>				

**Remarks:** Residual risks levels “High” and “Medium” are considered key risks that True Group needs to understand the effectiveness of its existing controls.

### Determining Severity (Y-Axis)

Severity			
Severity Level	Scale <i>(seriousness of impact)</i>	Scope <i>(how many people are or will be affected)</i>	Irremediable Nature/Remediability <i>(difficulty to restore the people impacted to a situation before impact)</i>
<b>Critical (5)</b>	Significant impact to health and safety: fatality	Impact to all stakeholders in the group (People, Customer, Partner, Social&Environment)	Impossible to restore or will take longer than 5 years (>60 months) to restore the impact
<b>Serious (4)</b>	Moderate impact to health and safety: serious injury that needs rehabilitation (loss time injury)	Impact to most stakeholders in particular stakeholder group (3of4 Groups) (People, Customer, Partner, Social&Environment)	Take between 3 to 5 years (36-60 months) to restore the impact
<b>Moderate (3)</b>	Slight impact to health and safety: minor injury or illness (loss time injury)	Impact to most stakeholders in particular stakeholder group (2of4 Groups) (People, Customer, Partner, Social&Environment)	Take between 1 to 3 years (12-36 months) to restore the impact
<b>Minor (2)</b>	Minor impact to health and safety: first aid case	Impact to some stakeholders in particular stakeholder group (1of4 group) (People, Customer, Partner, Social&Environment)	Take between 0.5 to 1 year (1 year) to restore the impact
<b>Insignificant (1)</b>	NO impact to health and safety	No negative impact to stakeholder	Take less than 0.5 year (6 months) to restore the impact

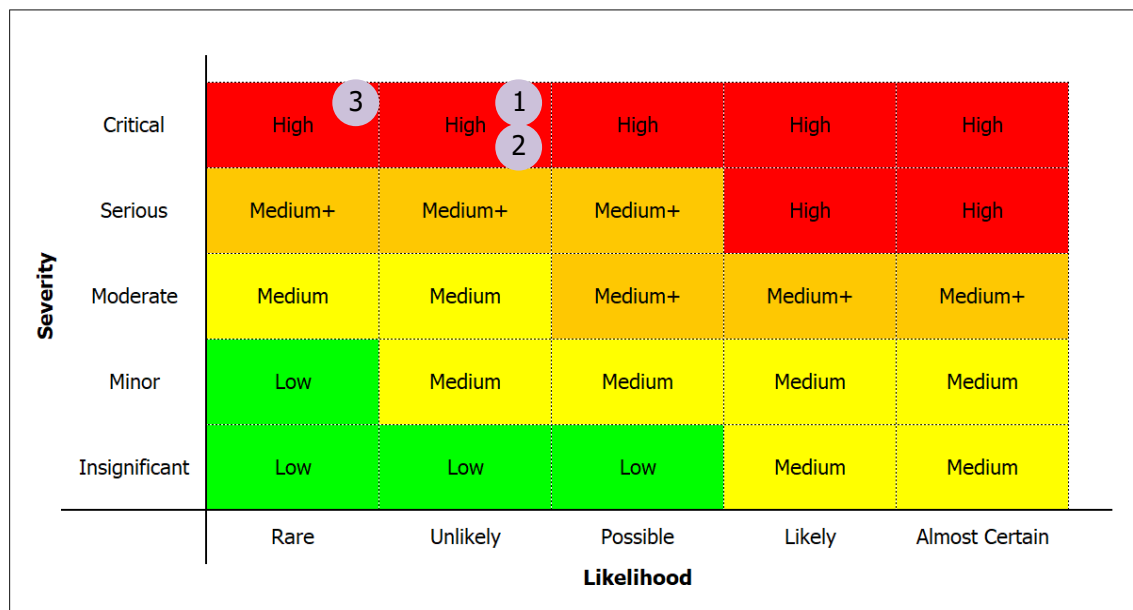
### Determining Likelihood (X-Axis)

Likelihood			
Level	Description	Frequency	Probability
<b>Almost Certain</b>	Could happen frequently. Continuously experienced. (Very likely to occur)	Regular occurrence Circumstances frequently encountered - daily/weekly/monthly	91–100%
<b>Likely</b>	Could happen often. Occurs frequently. (Likely to occur)	Circumstances occasionally encountered (few times a year)	61–90%
<b>Possible</b>	Could happen occasionally. Occurs occasionally, or several times in a service life. (May occur about half of the time)	Likely to happen at some point within the next 1-2 yrs	41–60%
<b>Unlikely</b>	Could happen but rare. Remote chance of occurrence; unlikely, but can reasonably be expected to occur. (Unlikely to occur)	Only likely to happen 3 or more years	11–40%
<b>Rare</b>	Remote possibility. Occurs only very rarely. Unlikely but possible. (Very unlikely to occur)	Has happened rarely / never happened before	0–10%

### 3. Integrate finding and take appropriate action

#### Results of Human Rights Risk Assessment

##### Risk Rating Scale



#### Human Rights Salient Issues in TrueGroup

1. Employee health and road safety
2. Customer/Consumer Privacy
3. Procurement of quality and safe products and services

Level of Risk Impact: ■ HIGH ■ MEDIUM ■ LOW

(More information in True Sustainability Report 2022, page 48-49)

### Percentage of Sites with Human Rights Risks and Mitigation Plan (True Group)

- 100 %** of own operation sites were assessed (60 Operation Sites)
- 31.67 %** of activities in own value chain operation sites with human rights risk
- 100%** of all high risk activities with mitigation plan and remediation process implemented

### Percentage of suppliers with Human Rights Risks and Mitigation Plan (Tier 1 Supplier)

- 100%** of total Tier 1 supplier with were assessed (2,001 Tier 1 in 98 product categories)
- 2.50%** of Tier 1 supplier was found to be at human rights risk.
- 100%** of Tier 1 supplier with human rights risks and with mitigation plan and remediation process implemented

### Percentage of Joint ventures with Human Rights Risks and Mitigation Plan (all joint ventures not included in Own Operations)

- 100%** of Joint ventures portfolios were assessed (6 number of investment portfolios)
- 0%** of Joint ventures portfolios with human rights risk
- 100%** of all high risk activities with mitigation plan and remediation process implemented

### Mitigation Measures

HUMAN RIGHTS RISK	IMPACTED ENTITY	MITIGATION	PERFORMANCE RESULTS
Employee health and road safety	<ul style="list-style-type: none"> <li>• Employees</li> </ul>	<ul style="list-style-type: none"> <li>• Provided road accident prevention training for employees.</li> <li>• Used a GPS tracker to monitor employee driving.</li> <li>• Put preventive measures and company vehicle rules in place.</li> </ul>	<ul style="list-style-type: none"> <li>• 100% of employees using company vehicles received road accident prevention training courses.</li> <li>• There were no employee fatalities from road accidents.</li> <li>• Other safety training courses are detailed under the topic of Human Resource Management on 2022 SD Report page 47.</li> </ul>
Customer/Consumer Privacy	<ul style="list-style-type: none"> <li>• Customer</li> <li>• Employee</li> </ul>	<ul style="list-style-type: none"> <li>• Adopted a personal data protection policy and complied with effective security measures, such as encryption and access authorization.</li> <li>• Conducted a random audit, facilitated by a quality assurance unit.</li> </ul>	<ul style="list-style-type: none"> <li>• 100% of employees with access to customer data signed an agreement to protect customer privacy.</li> <li>• There was 0% customer data security breach.</li> <li>• Personal data protection</li> </ul>

HUMAN RIGHTS RISK	IMPACTED ENTITY	MITIGATION	PERFORMANCE RESULTS
		<ul style="list-style-type: none"> <li>• Provided training to raise understanding of personal data management.</li> </ul>	<p>policy and security measures to be reviewed at least once a year.</p>
<p>Procurement of quality and safe products and services</p>	<ul style="list-style-type: none"> <li>• Customer</li> <li>• Suppliers</li> </ul>	<ul style="list-style-type: none"> <li>• Inspected products and services for quality, safety, and environmental friendliness, according to the ISO 9001:2015 Standards.</li> <li>• Organized a product inspection by third parties.</li> <li>• Conducted a supplier sustainability on-site audit.</li> <li>• Provided product safety and quality development training to upgrade suppliers to strategic partners.</li> </ul>	<ul style="list-style-type: none"> <li>• 100% of factories were certified for ISO 9001:2015.</li> <li>• 100% of products and equipment were inspected to ensure they meet standards and conform with laws and safety requirements.</li> <li>• 100% of suppliers passed the supplier sustainability audit.</li> <li>• 100% of products and equipment were inspected to ensure they meet standards and conform with laws and safety requirements.</li> <li>• 100% of suppliers completed product safety training and quality assessment in collaboration with relevant agencies.</li> </ul>

#### **4. Track and communicate performance**

In addition to the continuous review of human rights due diligence process and reporting of human rights performances, True Group has also been constantly tracking any cases of violations in which our operations may have to our stakeholders. To do so, we have implemented various communication channels that are easily access and always reachable by all stakeholders, to ensure that any violations that may exists are thoroughly mitigate and to provide appropriate remediation in the case of actual violations.

Communication channels detailed as follows: Internal Communications, True Connect Application, True Care Center Chatbot, Sustainability Report, Annual Report, True official Web site.

In addition, anyone can raise any questions or concerns regarding our human rights practices or violations, via:

- Email Address : [auditcommittee@truecorp.co.th](mailto:auditcommittee@truecorp.co.th);
- Company Website: <https://www.true.th/true-corporation/site/sustain-operation>

## 5. Remediate adverse impacts

In 2022, True Group organized a workshop on the Human Rights Due Diligence Process, which is regularly every two years with preparing risk prevention and mitigation measures, providing reasonable remedies (both finance and non finance). With the collaboration of all departments within True Group and our joint ventures, and representatives of suppliers and contractors, the review covered 100% of True Group’s operations and value chain. For 2022, there was a case of human rights violation where an employee reported a verbal abuse by supervisor. The company formed an investigation committee, which confirmed the complaint’s validity. The supervisor was verbally warned, and HR department conducted a one-on-one training program for the supervisor twice a week during a three-month period. The behavior of the involved employee was closely monitored and there was no further human rights violation.

We have set up complaint channels in each operation designed especially for emergency use and crisis. We have also defined procedures to ensure that affected individuals have immediate access to remedy.

Affected individuals can submit complaints through complaint centers set up in each operation, or through True’s Call Center. True Group will then investigate the root cause of the complaint, and then implement mitigation and protection measures.

In the event that we cannot conclude the incident during the prevention and remediation process, True will establish protection and remediation measures through working with the external stakeholders such as local administrations, community leaders, and relevant government agencies in order to manage the complaints to meet all parties’ expectations.

