



# Thaioil Public Company Limited

Human Rights Due Diligence Process and  
Human Rights Impact Assessments and Management (HRIAM) Report 2020

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## CHALLENGES, RISKS, AND IMPACTS

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

# CHALLENGES, RISKS, AND IMPACTS





# Our Commitment

## Our Commitment

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

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

## Our Strategy

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





Human Rights Policy in the Workplace

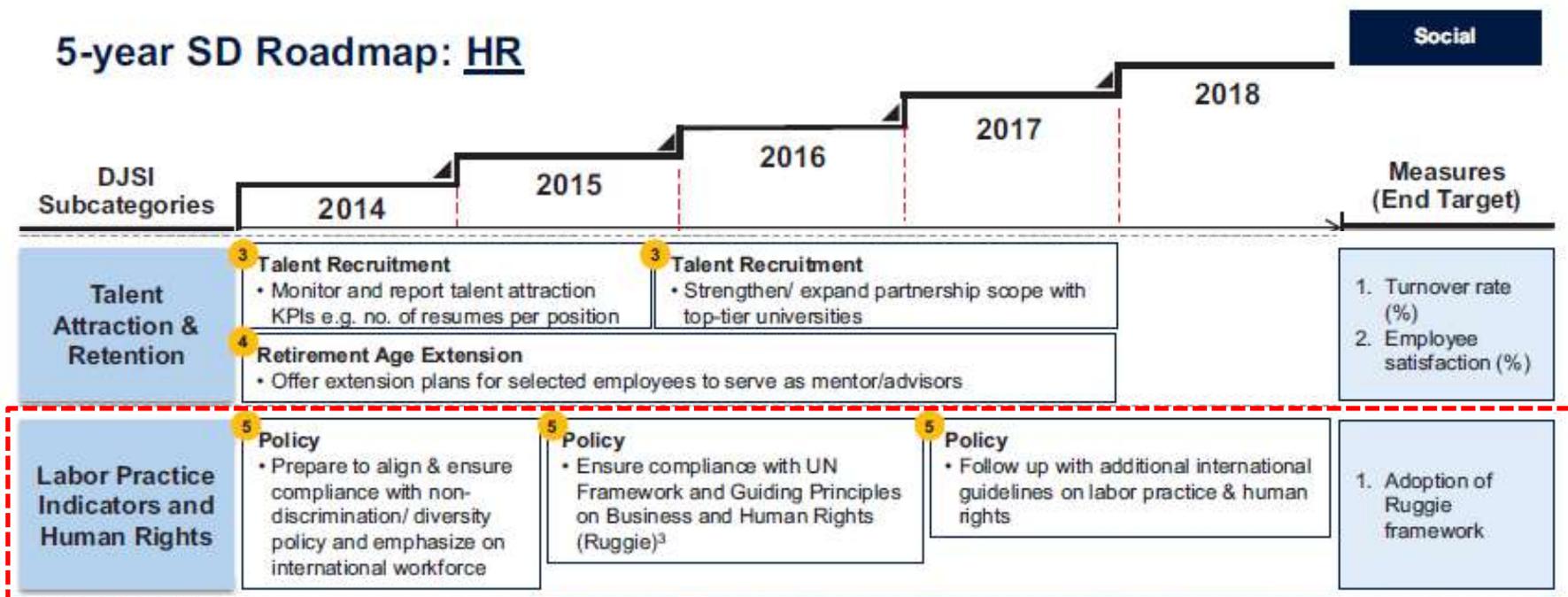
- Human Rights Policy
- 7-Step Human Rights Due Diligence Process

Thaioil Group Business and Human Rights Policy for Supply Chain

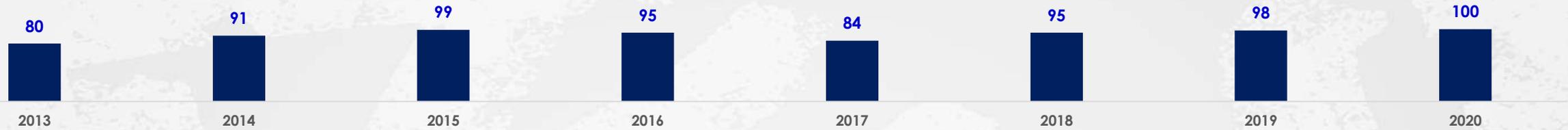
- Human Rights Working Team
- Human Rights Position Paper
- Human Rights Risk Assessment (March)
- Human Rights Training (June)
- Human Rights Impact and Assessment Report



## 5-year SD Roadmap: HR



Note: <sup>1</sup>ROI can be measured by other measures e.g. # of reports, patents, efficiency level; <sup>2</sup>Prerequisite with discussion with Strategic Planning (SP); <sup>3</sup>e.g. expansion to Indonesia - preparation to provide to local workforce; <sup>4</sup>ISSD will be the project sponsor for this initiative; Source: HR Department Analysis (3/12/13); PrimeStreet Analysis



Human Rights Policy in the Workplace

- Human Rights Policy
- 7-Step Human Rights Due Diligence Process

Thaioil Group Business and Human Rights Policy for Supply Chain

- Human Rights Working Team
- Human Rights Position Paper
- Human Rights Risk Assessment (March)
- Human Rights Training (June)
- Human Rights Impact and Assessment Report

2021	2022	2023	2024	2025	Social Measures
1. Align & ensure compliance with National Action Plan on Business and Human Rights (NAP) phase 1 (แผนปฏิบัติการระดับชาติว่าด้วยธุรกิจกับสิทธิมนุษยชน ระยะที่ 1 ช่วงระหว่างปี 2562-2565)				1. Align & ensure compliance with National Action Plan on Business and Human Rights (NAP) phase 2.	<ul style="list-style-type: none"> <li>• Adoption of Ruggie framework</li> <li>• Adoption of Thailand NAP</li> </ul>
2. Adopt the best practice of global companies applying human rights global standard.	2. Monitor and adopt market practice of global companies and global practices continuously. Also, evaluate and compare Thaioil human rights implementation results against market practices.				<ul style="list-style-type: none"> <li>• Human rights Maturity Level of Thaioil. 'Best Class level'</li> <li>• No complaint on human rights</li> <li>• Completed &amp; Updated Human Rights Procedure</li> <li>• Human Rights Award (รางวัลองค์กรต้นแบบด้านสิทธิมนุษยชน)</li> </ul>
3. Follow up with additional international guideline on Human Rights.	3. Put in place effective remedy and grievance mechanisms.	3. Monitor and report remedy and grievance mechanisms performance.			
4. Incorporate Human right policy throughout Thaioil affiliates.	4. Deploy Thaioil human rights policy, procedure, practice to its affiliates in phasing. Also, Monitor and report Thaioil affiliates performance.				
5. Ensure the protection of migrant rights and ethical recruitment practices.	5. Monitor & report migrant rights and ethical recruitment practices performance.				
6. Develop Thaioil Human Rights micro leanings and do communication/marketing to all stakeholders					



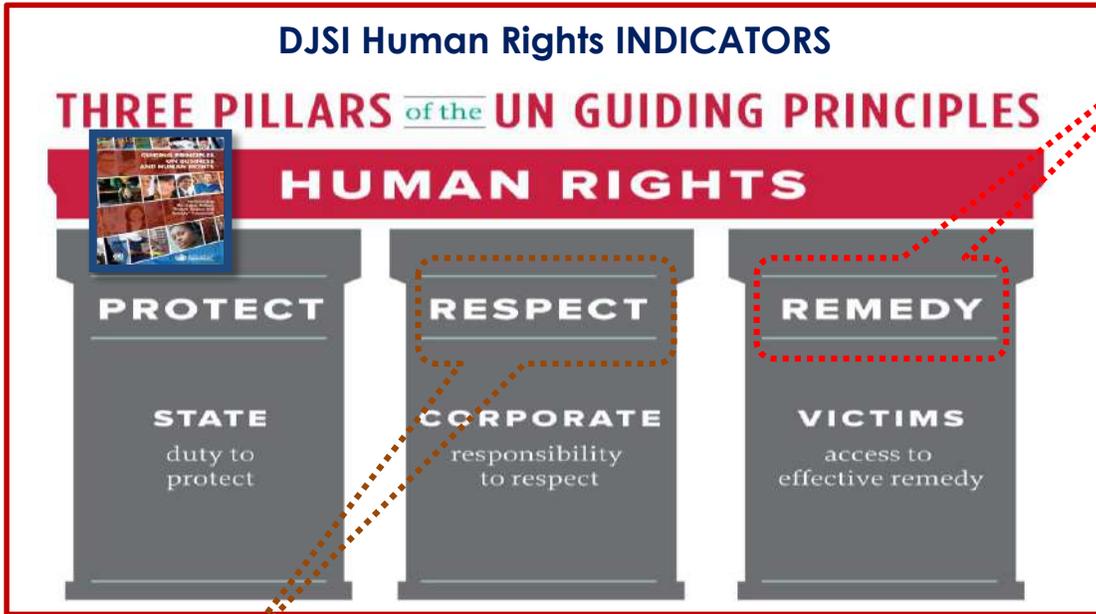
## Our Thairoil Group Human Rights Policy

### Empower Human Life through Sustainable Energy and Chemicals

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

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





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

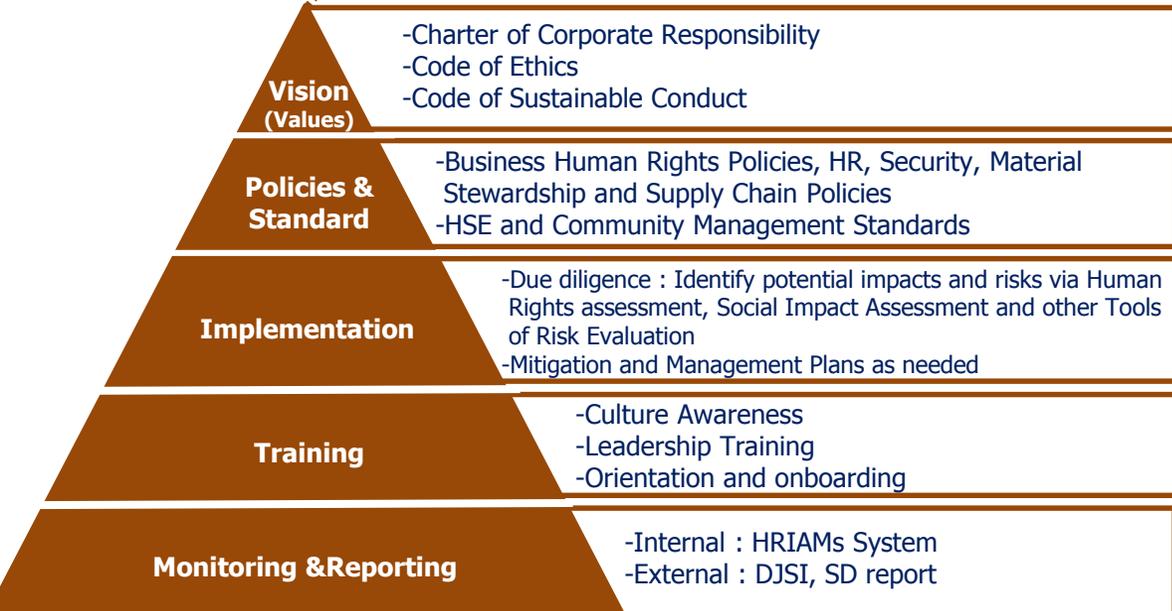
The human rights issues related to **the vulnerable groups covers all Stakeholders and value chain.**

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

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

### Thailoil Value Chain

Employee and Contractors	Safety, Security and Environment	Social and Communities	Suppliers and Sub-contractors	Customer and Consumer
<b>PM</b>	<b>QM &amp; CA</b>	<b>CA</b>	<b>PC</b>	<b>CM &amp; TR</b>
<u>Labour Right</u>	<u>Safety, Security and Environment</u>	<u>Community Right</u>	<u>Supplier engagement &amp; code of conduct</u>	<u>Customer Right</u>
<ul style="list-style-type: none"> <li>- Working conditions</li> <li>- Anti-Slavery and Human Trafficking Policy</li> <li>- Freedom of association and collective bargaining</li> <li>- Forced and compulsory labor</li> <li>- Equal pay policy</li> <li>- Child labor,</li> <li>- Non-Discrimination and Anti-Harassment Policy</li> <li>- Safety and Health at Work Policy</li> </ul>	<ul style="list-style-type: none"> <li>- Safty &amp; Security management,</li> <li>- Security Training,</li> <li>- Warter security,</li> <li>- Impact of pollution,</li> <li>- Waste and hazardous materials management,</li> <li>- Preservation of biodiversity</li> </ul>	<ul style="list-style-type: none"> <li>- Standards of living and quality of life,</li> <li>- Community health and safety,</li> <li>- Community engagement,</li> <li>- Cultural heritage,</li> <li>- Minorities including indigenous peoples,</li> <li>- Resettlement</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with TOP Group Business and Human Rights Policy for Stakeholder (TOP) and Supplier Code (14 +17 issues)</li> </ul>	<ul style="list-style-type: none"> <li>- Consumer Health and Safety,</li> <li>- Data Privacy,</li> <li>- Access to energy</li> </ul>
<b>Existing control level by stakeholders</b> <i>(TOP GROUP Risk Assessment by CR)</i>				



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

## Action in 2015 – 2017

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

หน้าในเอกสาร  
หนังสือเลขที่ 1182558

ถึง พนักงานทุกคน

จาก ประธานเจ้าหน้าที่บริหารและกรรมการผู้จัดการใหญ่ วันที่ 25 สิงหาคม 2558

#### เรื่อง นโยบายด้านสิทธิมนุษยชนในสถานที่ทำงาน

เพื่อเป็นกรอบในการปฏิบัติงานที่มีคุณค่าและมั่นคงในความสัมพันธ์กับคู่ค้า  
การดูแลขององค์กรที่ครอบคลุม โดยที่ครอบคลุมตั้งแต่ในขั้นต้นไปจนถึงในขั้นสุดท้าย และต้อง  
มุ่งคำมั่นที่จะไม่ละเมิดสิทธิมนุษยชนและเคารพสิทธิมนุษยชนของทุกคน โดยที่ปฏิบัติอย่างสม่ำเสมอ  
โดยไม่คำนึงถึงถิ่นที่อยู่นั้น ไม่มีการแบ่งแยกเชื้อชาติ ศาสนา สัญชาติ สัญชาติ ราชอาณาจักร  
ความพิการ (ไม่ว่าจะเป็นโรค หรือความพิการหรือความบกพร่องทางสติปัญญา) หรือเชื้อชาติ ภูมิภาค  
และวัฒนธรรม เพื่อให้สอดคล้องกับหลักการของและนโยบายด้านสิทธิมนุษยชนในสถานที่ทำงาน  
ตามเอกสารแนบ และให้ครอบคลุมตั้งแต่เริ่มต้นที่ 25 สิงหาคม 2558 เป็นต้นไป

บริษัทฯ จะไม่ละเมิดสิทธิมนุษยชนในข้อขัดแย้งกับกฎหมายและข้อปฏิบัติขององค์กร  
บริษัทฯ จะไม่ละเมิดสิทธิมนุษยชนในข้อขัดแย้งกับกฎหมายและข้อปฏิบัติขององค์กร

(นางสมิลา วัฒนศิริ)  
ประธานเจ้าหน้าที่บริหารและกรรมการผู้จัดการใหญ่

#### นโยบายด้านสิทธิมนุษยชนในสถานที่ทำงาน

เรื่อง ข้าราชการพนักงาน  
สิทธิมนุษยชน เป็นสิทธิขั้นพื้นฐานและเสรีภาพที่บุคคลมีโดยชอบด้วยกฎหมาย  
บุคคลในทุกระดับที่ปฏิบัติงานของ บริษัท ให้อำนาจบุคคลคนละคนละอย่างกับสิทธิมนุษยชน  
ซึ่งมีสาระสำคัญว่า สิทธิขั้นพื้นฐานที่บุคคลคนละคนละอย่างกับสิทธิมนุษยชน  
และสิทธิมนุษยชนขั้นสูง

บริษัทฯ จะไม่ละเมิดสิทธิมนุษยชนในข้อขัดแย้งกับกฎหมายและข้อปฏิบัติขององค์กร  
บริษัทฯ จะไม่ละเมิดสิทธิมนุษยชนในข้อขัดแย้งกับกฎหมายและข้อปฏิบัติขององค์กร

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

หน้าในเอกสาร  
หนังสือเลขที่ 2170259

ถึง พนักงานทุกคน

จาก ประธานเจ้าหน้าที่บริหารและกรรมการผู้จัดการใหญ่ วันที่ 25 สิงหาคม 2559

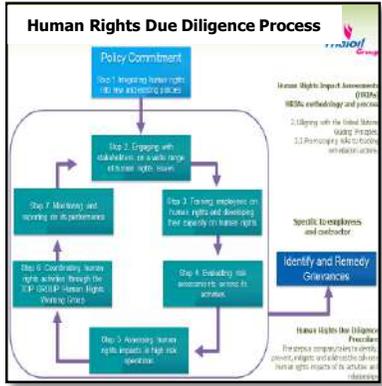
#### เรื่อง นโยบายด้านธุรกิจและสิทธิมนุษยชนสำหรับคู่ค้า

เพื่อเป็นการสนับสนุนในการปฏิบัติงานที่มีคุณค่าและมั่นคงในความสัมพันธ์กับคู่ค้า  
ที่มีคุณค่าและมั่นคงในความสัมพันธ์กับคู่ค้าที่มีคุณค่าและมั่นคงในความสัมพันธ์กับคู่ค้า  
บุคคลในทุกระดับที่ปฏิบัติงานของ บริษัท ให้อำนาจบุคคลคนละคนละอย่างกับสิทธิมนุษยชน  
ซึ่งมีสาระสำคัญว่า สิทธิขั้นพื้นฐานที่บุคคลคนละคนละอย่างกับสิทธิมนุษยชน  
และสิทธิมนุษยชนขั้นสูง

#### หลักปฏิบัติสำหรับคู่ค้า ด้านนโยบายธุรกิจและสิทธิมนุษยชน

1. การดูแลของ  
บริษัท ให้อำนาจบุคคลคนละคนละอย่างกับสิทธิมนุษยชน  
ซึ่งมีสาระสำคัญว่า สิทธิขั้นพื้นฐานที่บุคคลคนละคนละอย่างกับสิทธิมนุษยชน  
และสิทธิมนุษยชนขั้นสูง

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



#### Human Rights Risk Assessment focus in Employee and Contractor



## Action in 2018-2021

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



7. Add Human right criteria for TOP contractor yearly contract evaluation.
8. Incorporate Human right policy through TOP group supply chain
9. Develop
  - Our TOP GROUP Human Rights Policy,
  - Thaioil Group Human Rights Management System Procedure and
  - Grievance mechanisms and effective Remedy Framework Procedure and Fitness for Work and Return to Work Procedure
10. 2021 Thaioil GROUP Human Rights Policy in Workplace (revision2)
11. 2021 Thaioil GROUP Business and Human Rights Policy for Supply Chain – Business Partners Code of Conducts-Business and Human Rights Policy (revision2)

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

2.1 Thaioil and Subsidiaries' employees in all levels, must have clear and thorough understandings about relevant laws associated with work and direct responsibilities, and strictly follow them. Should the employees be uncertain of practices, it is advised to consult the law office and must not act without instruction.

2.2 Thaioil and Subsidiaries comply and categorize laws, rules and regulation for employees to study, and appropriately and adequately educate employees on the relevant laws and regulations.

2.3 Thaioil and Subsidiaries must strictly follow the international human rights, educate employees on the international human rights so that they are able to apply with their work, and must not support any business which violates the international human rights standard.

2.4 Employees who are assigned to operate abroad should study about laws, cultures and traditions of the destined country prior to travelling, to ensure that products, product samples, brought equipment and travel document as well as travelling purpose and operation are legal and do not go against cultures and traditions of the destined country.



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

1) Thaioil and Subsidiaries strictly monitor the Universal Declaration of Human Rights at national and international levels, including the constraints posed by labor laws in each country where a business operates, by instituting workplaces that are safe, internationally-standardized hygienic, and narcotics-free. Thaioil and Subsidiaries treat all employees equally; do not discriminate due to the similarity or difference of birth origin, gender, age, skin color, race, nationality, religion, belief, political view, disability, family background, or any other status unrelated to business operation. Thaioil and Subsidiaries also respect individual rights and freedom, and protect personal data.

2) Thaioil and Subsidiaries must actively ensure that the business operation does not involve with the violation of human rights, and that it participates and adopts guidelines helpful to world society, including United Nations' human rights principles.

3) Thaioil and Subsidiaries must educate the employees on human rights' principles in order to apply with their operation, and must not support business and/ or activities violating international human rights.”

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

### Business Partners Code of Conducts Business and Human Rights Policy (revision2)

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



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

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

#### 1. Scope of this Privacy Policy

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

#### 2. Definition

2.1. “Personal Data” means data about a person that can directly or indirectly identify such person but does not include data of a deceased person in particular

2.2. “Sensitive Personal Data” means data that is a truly personal matter but is sensitive and may risk unfair discrimination such as race, ethnicity, political views, creed, religion or philosophy behavior, sexual behavior, criminal history, health data, disability, labor union data, genetic data, biological data or any other data that affects the Data Subject in the same way as prescribed by the Personal Data Protection Committee

2.3. “Processing” means actions relating to the collection, use, disclosure, deletion or destruction of Personal Data

2.4. “Data Subject” means natural person who is the owner of the Personal Data and such Personal Data is directly or indirectly identifiable to such person

2.5. “Data Controller” means person or juristic person having the authority to make decision about the collection, use, or disclosure of Personal Data

2.6. “Data Processor” means person or juristic person undertaking the collection, use or disclosure of Personal Data in accordance with an order or on behalf of TOP. Thus, this person or juristic person is not a Data Controller

#### 3. Collection of Personal Data

3.1. TOP will collect Personal Data with purposes, scope and apply lawful and fair methods. The collection will be done only as necessary for the business objectives of TOP.

3.2. In the case of collection of Sensitive Personal Data, TOP will ensure that the Data Subject acknowledges and give consent to such collection via electronic method or other methods. TOP will explicitly request for consent from the Data Subject prior to the collection of Sensitive Personal Data unless such collection of Personal Data and Sensitive Personal Data falls under an exception provided under the Personal Data Protection Act B.E.2562 or other laws.

## Our Procedure

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

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

### Thaioil GROUP Human Rights Working Team

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

# Our Procedure





**Thaioil Group Human Rights Impact Assessment and Management Procedure**  
**(แนวปฏิบัติการประเมินและจัดการผลกระทบ**  
**ด้านสิทธิมนุษยชนกลุ่มไทยออยล์)**

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

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.....  
**(CHIRAPORN KAMON-IN)**  
**MANAGER - INDUSTRIAL/EMPLOYEE RELATIONS**



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

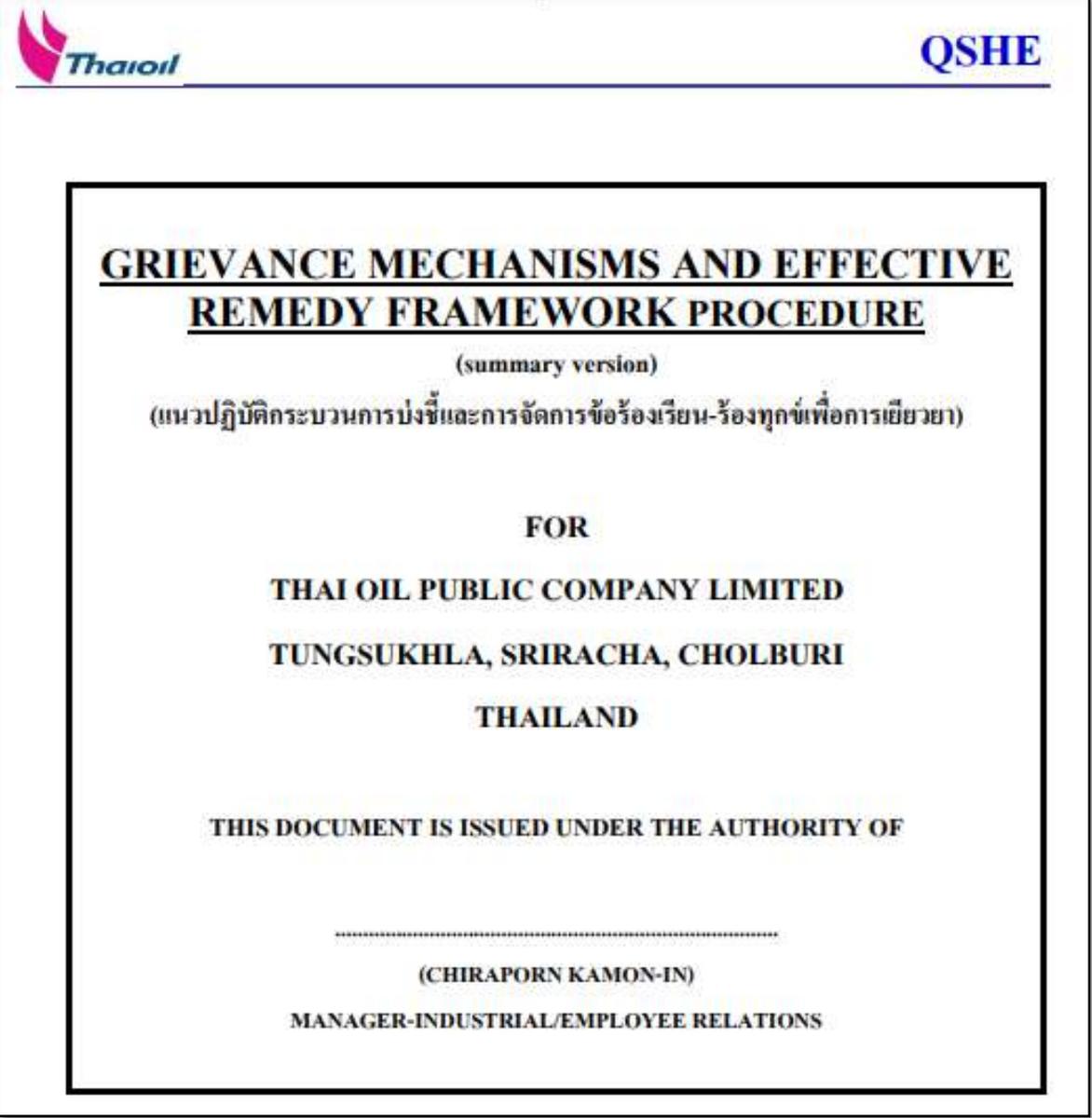
**Summary:**

This document outlines Thaioil Group Human Rights Impact Assessment and Management Procedure. The document is publicly disclosed in the URLs:  
[https://www.thaioilgroup.com/upload/content\\_file/202107020803\\_ThaioilGroupHumanRightsImpactAssessmentandManagementProcedure\\_TH.pdf](https://www.thaioilgroup.com/upload/content_file/202107020803_ThaioilGroupHumanRightsImpactAssessmentandManagementProcedure_TH.pdf)

The content of the document includes;

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





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

**Summary:**

This document outlines Thai Oil Group Grievance Mechanisms and Effective Remedy Framework Procedure. The document is publicly disclosed in the URLs:  
[https://www.thaioilgroup.com/upload/content\\_file/202106291600\\_202011131654\\_GrievancemechanismsandeffectiveRemedyFrameworkPROCEDURE20201.pdf](https://www.thaioilgroup.com/upload/content_file/202106291600_202011131654_GrievancemechanismsandeffectiveRemedyFrameworkPROCEDURE20201.pdf)

The content of the document includes;

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



## FITNESS FOR WORK AND RETURN TO WORK PROCEDURE

FOR

THAI OIL PUBLIC COMPANY LIMITED

TUNGSUKLA, SRIRACHA, CHOLBURI

THAILAND

THIS DOCUMENT IS ISSUED UNDER THE AUTHORITY OF

.....  
(ARPAKORN WONGSATHAPORNPAT)

MANAGER - HR SERVICES



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

### Summary:

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

The content of the document includes;

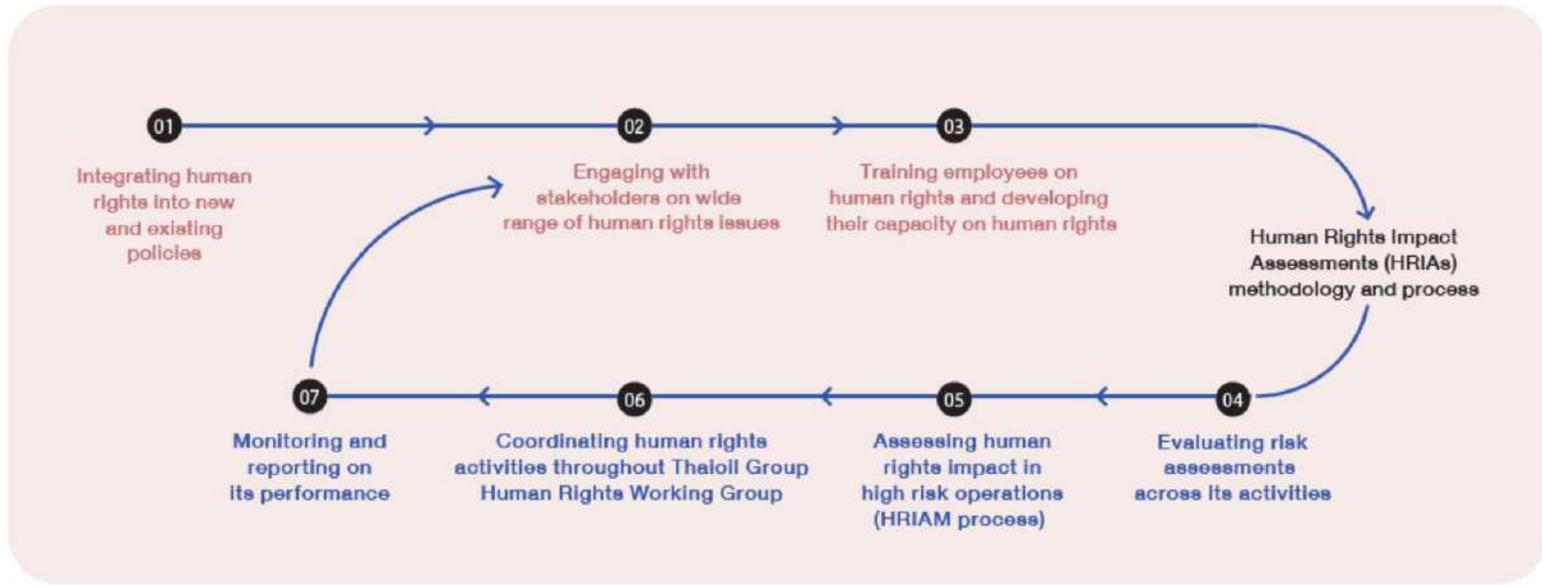
- Responsibility and department in charge (pdf page 3-4)
- Remedy Procedure and Continual Improvement for sick employees, pregnant employees and employees who are unable to perform the job description agreed with the company (pdf page 4-7)



# Our Salient human rights issues

## Our Salient human rights issues

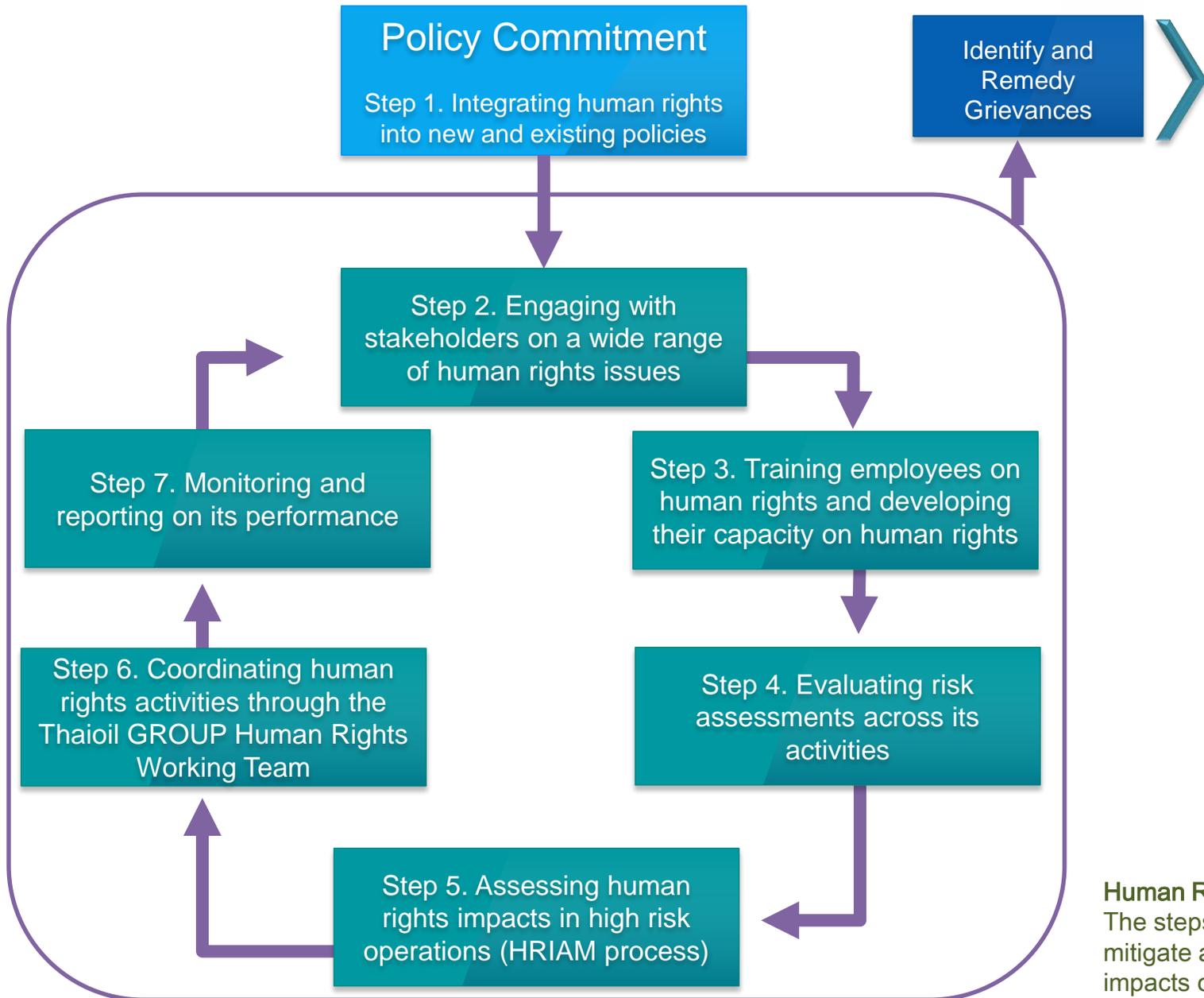
Human rights risk assessment is part of Thaioil's 7-step human rights due diligence process.



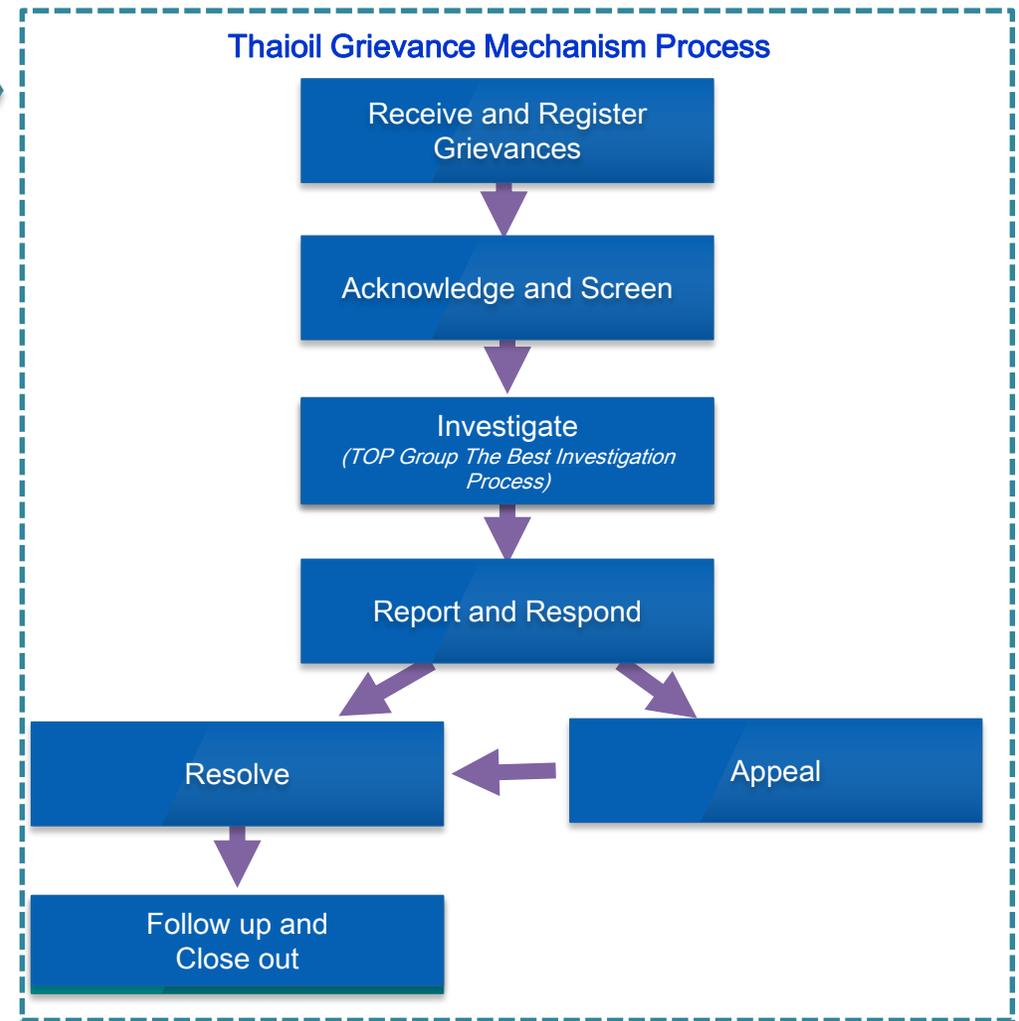
Thaioil's human rights due diligence process is aligned with the UN Guiding Principles on Business and Human Rights. See more details on the [Thaioil website](#).



# Human Rights Due Diligence Process



# Grievance Mechanism Process



**Human Rights Due Diligence Procedure**  
 The steps a company takes to identify, prevent, mitigate and address the adverse human rights impacts of its activities and relationships



Step 5. Assessing human rights impacts in high risk operations



Step 4. Evaluating risk assessments across its activities

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

Step 7. Monitoring and reporting on its performance

## HRIAM process ;

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

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

### 2. HRIAs methodology and process.

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

### 3. Scoping human rights risks.

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

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

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

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

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

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

- 6.1. HRIAs Reports and Action Plans.
- 6.2. The challenge of communicating results.

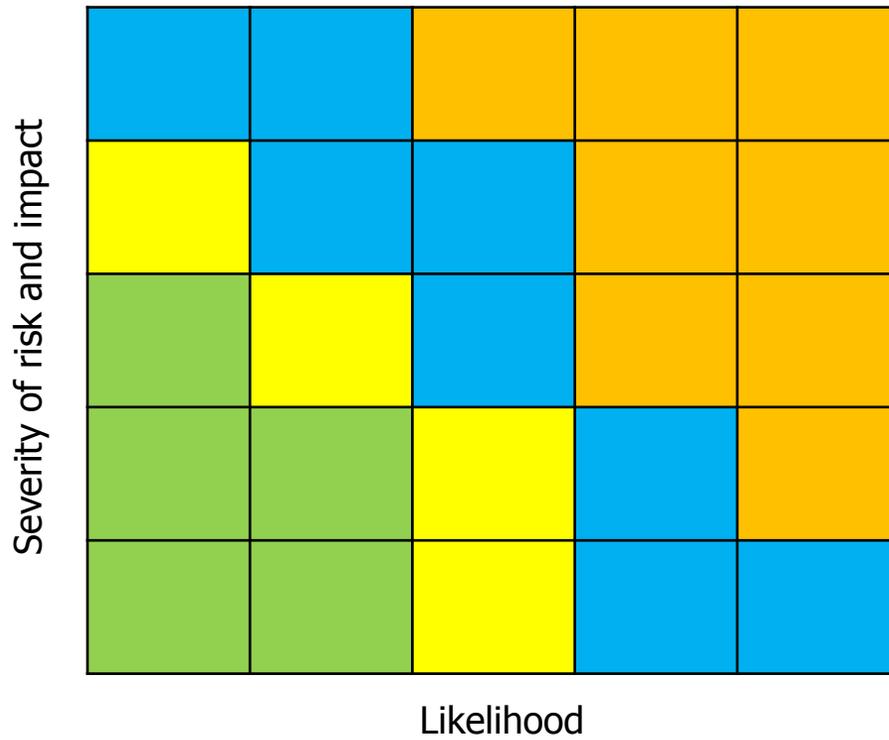
### 7. Mainstreaming human rights into Thaioil GROUP's policies and procedures.



# Human Rights Risks Assessment Matrix

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

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



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

**Remarks:** Residual risks levels "Extreme"  and "High"  are considered key risks that Thairoil needs to understand the effectiveness of its existing controls.

## Thaioil Human Rights Risks Assessment Criteria : Severity

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

## Thaioil Human Rights Risks Assessment Criteria : Likelihood

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

# Human Rights Impact Assessments and Management (HRIAM)

Definition and goal



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

*“all stakeholders”*

**Main human rights issues and vulnerable groups**

## Thaioil’s Vulnerable Groups.

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

## The Human Rights Protection of Vulnerable Groups ;

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

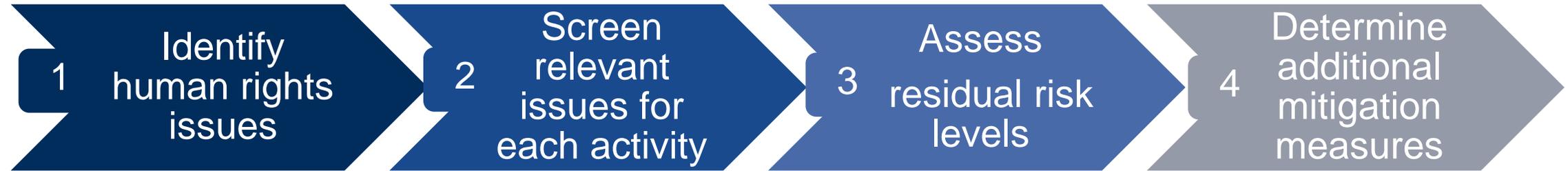
# Scope of Thaioil Human Rights Risks Assessment : Thaioil Value Chain

Employee and Contractors	Safety, Security and Environment	Social and Communities	Suppliers and Sub-contractors	Customer and Consumer
PM	QM & CA	CA	PC	CM & TR
<p><u>Labour Right</u></p> <ul style="list-style-type: none"> <li>- Working conditions</li> <li>- Anti-Slavery and Human Trafficking Policy</li> <li>- Freedom of association and collective bargaining</li> <li>- Forced and compulsory</li> <li>- Equal pay policy</li> <li>- Child labor,</li> <li>- Non-Discrimination and Anti-Harassment Policy</li> <li>- Safety and Health at Work Policy</li> </ul>	<p><u>Safety, Security and Environment</u></p> <ul style="list-style-type: none"> <li>- Safety &amp; Security management,</li> <li>- Security Training,</li> <li>- Water security,</li> <li>- Impact of pollution,</li> <li>- Waste and hazardous materials management,</li> <li>- Preservation of biodiversity</li> </ul>	<p><u>Community Right</u></p> <ul style="list-style-type: none"> <li>- Standards of living and quality of life,</li> <li>- Community health and safety,</li> <li>- Community engagement,</li> <li>- Cultural heritage,</li> <li>- Minorities including indigenous peoples,</li> <li>- Resettlement</li> </ul>	<p><u>Supplier engagement &amp; code of conduct</u></p> <p>Compliance with TOP Group Business and Human Rights Policy for Stakeholder (TOP) and Supplier Code (14 +17 issues)</p>	<p><u>Customer Right</u></p> <ul style="list-style-type: none"> <li>- Consumer Health and Safety,</li> <li>- Data Privacy,</li> <li>- Access to energy</li> </ul>

Existing control level by stakeholders

*(Thaioil Risk Assessment by CR)*

# Human Rights Risk Assessment Overview



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

Screen issues according to relevance with the identified activity.

Assess residual risk levels considering existing mitigation measures.

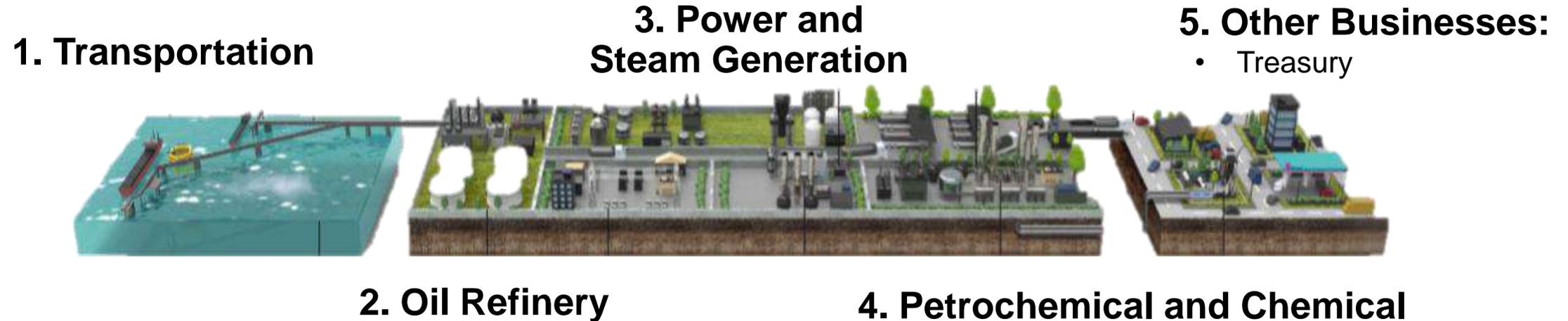
Integrate findings and determine additional mitigation measures to lower risk levels for salient human rights issues.

***This document details the risk assessment approach and findings in 2020 for both in own operations and the supply chain.***



## **Human Rights in Own Operations**

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



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

Main activities: Operations

Supporting Activities: Human Resources, Procurement, Customer Relations, CSR

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

**The assessment considered the following rights holders and vulnerable groups affected by Thairoil operations.**

- Employees
- Community members
- Third-party contracted labour, subcontractors, and suppliers onsite
- Customers and end consumers
- Vulnerable groups ; *Children, Indigenous peoples, Migrant workers, Religious or ethnic minorities, Persons with disabilities, Women, elderly, patients and transgender*

# Steps 1 and 2 : Scope and screen relevant issues

## Human Rights Issues Identified and Screened

Human Rights Issues	Transportation					Oil Refinery					Power and Steam Generation					Petrochemical and Chemical					Treasury
	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5	
Working Conditions	✓	✓	✓			✓	✓	✓			✓	✓	✓			✓	✓	✓			✓
Employee Health and Safety	✓		✓			✓		✓			✓		✓			✓		✓			✓
Illegal Forms of Labour	✓	✓	✓			✓	✓	✓			✓	✓	✓			✓	✓	✓			
Community Health and Safety	✓					✓					✓					✓					
Community Standard of Living	✓					✓					✓					✓					
Land Acquisition						✓					✓										
Security Practices	✓					✓					✓					✓					
Customer Safety																✓					
Data Privacy				✓					✓					✓					✓		✓

1 Operations  
 2 Human Resources  
 3 Procurement  
 4 Customer Relations  
 5 CSR

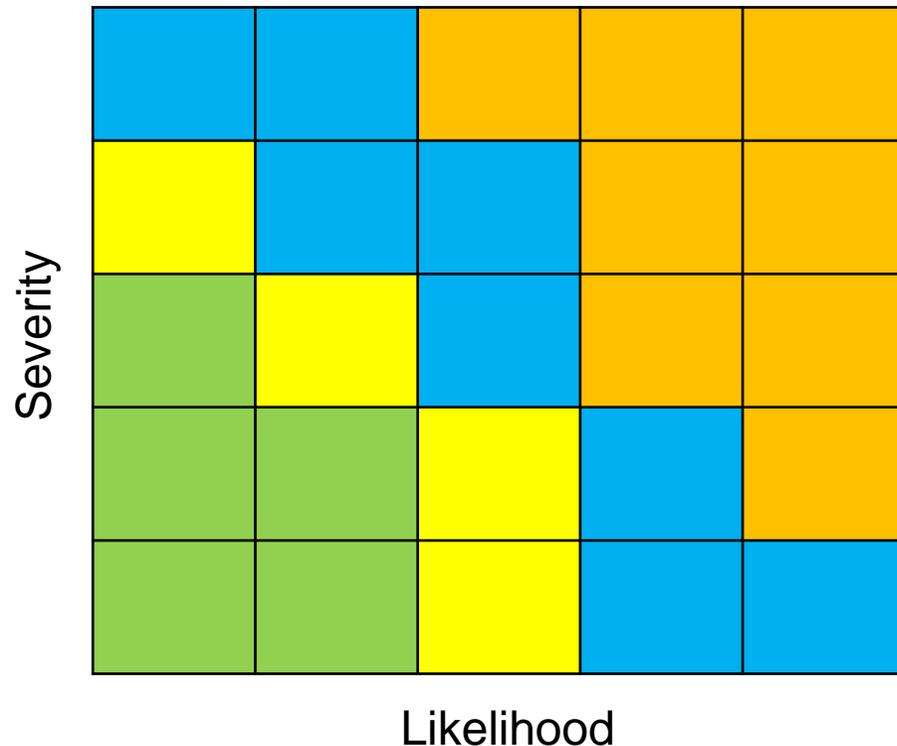
The supporting activities of the Treasury business are under the responsibility of Oil Refinery through shared service.

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

### *Risk Assessment Matrix*

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

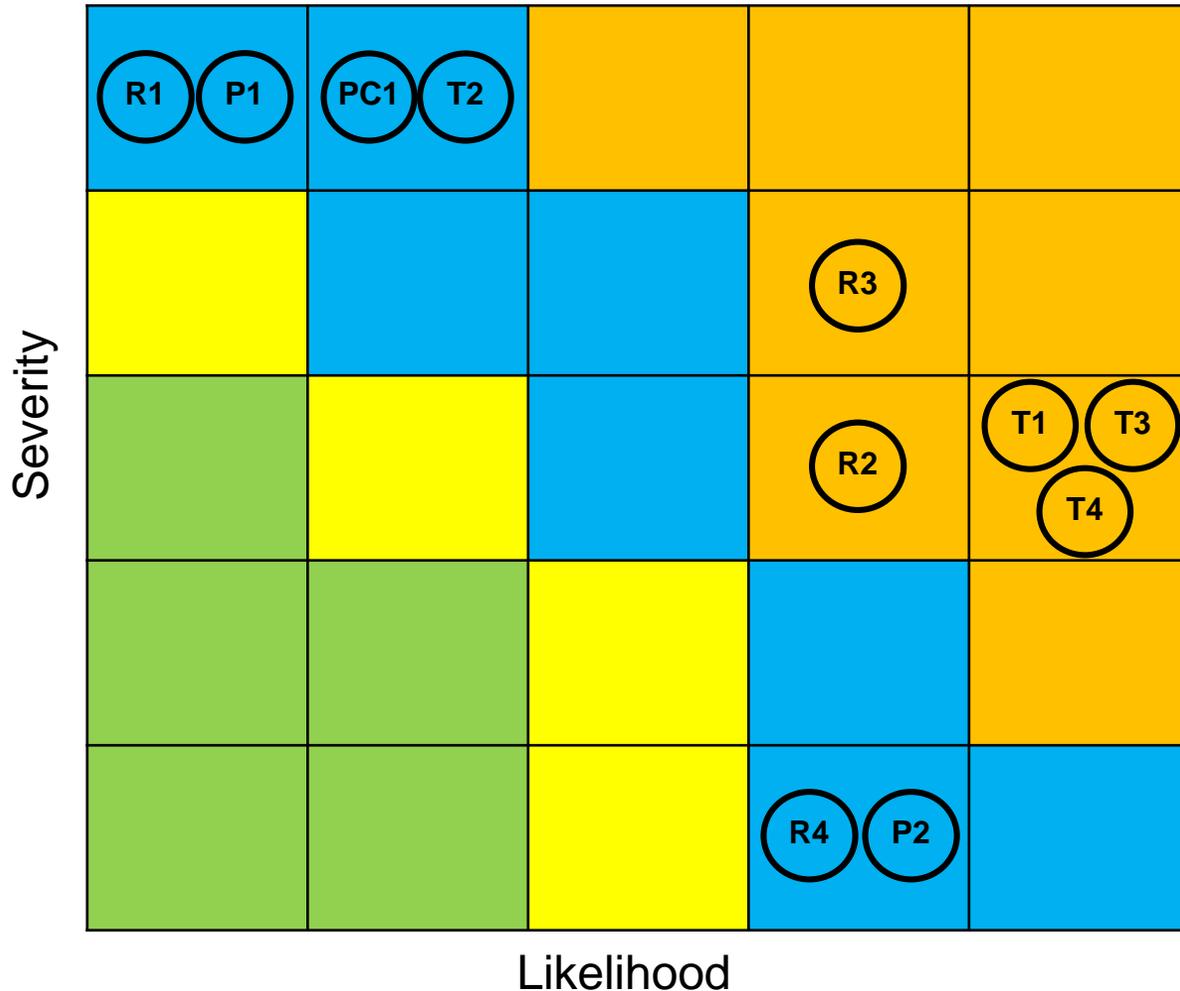
The assessment takes into account Thaioil vulnerable groups covers all Stakeholders, specifically our employees, Contractor, Sub-contractor, Community, Suppliers, Customers, women and children, Indigenous peoples, migrant workers, Religious or ethnic minorities, local community, Persons with disabilities,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



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

# Step 3 (2) : Assess residual risk levels

## Human Rights Salient Issues



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

# Step 4 : Determine additional mitigation measures

## Human Rights Salient Issues and Mitigation Measures

Activity and Sub-Activity	Human Rights Issue	Description of Risks	Existing and Additional Mitigation Measures	Result Monitoring
Transportation	1 Employee Health and Safety <b>T2</b>	<ul style="list-style-type: none"> <li>Failure to properly conduct safety inspection of ships</li> <li>Inadequate safety equipment</li> </ul>	<ul style="list-style-type: none"> <li>Ensure strict compliance with safety procedures, especially regarding inspection of safety equipment and high risk activities</li> </ul>	<ul style="list-style-type: none"> <li>100% complied with ILO standards</li> <li>100% for preparing communication plans to employees in advance.</li> <li>100% for Planning crew rotation</li> </ul>
	2 Working Conditions <b>T1 T3 T4</b>	<ul style="list-style-type: none"> <li>Long working hours and limited rest time and holidays due to unplanned changes in shipping schedules</li> </ul>	<ul style="list-style-type: none"> <li>Communicate to employees about potential scenarios where they may have to stay in the ship longer than planned</li> <li>[PLANNED] Investing more to bring employees back to shore when not able to dock (e.g., through small boats)</li> <li>[PLANNED] Planning crew rotation and monitoring to align with plans</li> </ul>	<ul style="list-style-type: none"> <li>100% complied with safety inspection standards</li> <li>100% for prepare an audit plan and conduct audits according to the plan.</li> </ul>
	3			
Oil Refinery	1 Employee Health and Safety <b>R1</b>	<ul style="list-style-type: none"> <li>Inadequate safety training</li> <li>Safety risks, such as gas leaks</li> </ul>	<ul style="list-style-type: none"> <li>Safety management system certified by international standards</li> <li>Ensure strict compliance with safety procedures</li> </ul>	<ul style="list-style-type: none"> <li>100% complied with safety management system certified by international standards</li> </ul>
	Community Health and Safety <b>R2</b>	<ul style="list-style-type: none"> <li>Safety risks from normal operations</li> <li>Impacts from construction, such as property damage that can cause safety impacts</li> </ul>	<ul style="list-style-type: none"> <li>Evacuation procedures in the event of emergency</li> <li>Community engagement and grievance mechanisms</li> </ul>	<ul style="list-style-type: none"> <li>Community in all areas in which Thairoil operates</li> <li>50% have improved the workflow in emergency situations taking into account the COVID-19 situation.</li> <li>50% have improved and communicated community engagement and grievance mechanisms, including the COVID-19 situation.</li> <li>34 complaints submitted by communities in 2020.</li> </ul>
	Community Standard of Living <b>R3</b>	<ul style="list-style-type: none"> <li>Impacts from construction, such as noise and property damage</li> </ul>	<ul style="list-style-type: none"> <li>Community engagement and grievance mechanisms</li> <li>Payment of incurred costs from property damage</li> </ul>	
	3 Working Conditions <b>R4</b>	<ul style="list-style-type: none"> <li>Working conditions for subcontractors that do not comply with labour laws</li> <li>Instances wherein suppliers employ subcontractors without informing Thairoil</li> </ul>	<ul style="list-style-type: none"> <li>Monitoring supplier compliance with contract, which includes a clause on compliance with Supplier Code of Conduct with human rights principles</li> <li>[PLANNED] Increase monitoring on subcontractors</li> </ul>	<ul style="list-style-type: none"> <li>100% complied with contract, which includes a clause on compliance with Supplier Code of Conduct with human rights principles</li> <li>100% for prepare an audit plan and conduct audits according to the plan.</li> </ul>

## Step 4 : Determine additional mitigation measures

## Human Rights Salient Issues and Mitigation Measures

Activity and Sub-Activity	Human Rights Issue	Description of Risks	Existing and Additional Mitigation Measures	Result Monitoring
Power and Steam Generation	1 Employee Health and Safety <b>P1</b>	<ul style="list-style-type: none"> <li>Inadequate safety training</li> <li>Safety risks, such as gas leaks</li> </ul>	<ul style="list-style-type: none"> <li>Safety management system certified by international standards</li> <li>Ensure strict compliance with safety procedures</li> </ul>	<ul style="list-style-type: none"> <li>100% complied with safety management system certified by international standards</li> <li>50% have prepared an audit plan and conduct audits according to the plan.</li> </ul>
	3 Working Conditions <b>P2</b>	<ul style="list-style-type: none"> <li>Working conditions for subcontractors that do not comply with labour laws</li> <li>Instances wherein suppliers employ subcontractors without informing Thairoil</li> </ul>	<ul style="list-style-type: none"> <li>Monitoring supplier compliance with contract, which includes a clause on compliance with Supplier Code of Conduct with human rights principles</li> <li>[PLANNED] Increase monitoring on subcontractors</li> </ul>	<ul style="list-style-type: none"> <li>100% complied with contract, which includes a clause on compliance with Supplier Code of Conduct with human rights principles</li> <li>100% for prepare an audit plan and conduct audits according to the plan.</li> </ul>
Petrochemical and Chemical	1 Community Health and Safety <b>PC1</b>	<ul style="list-style-type: none"> <li>Chemical leaks during distribution and logistics activities, especially flammable substances</li> </ul>	<ul style="list-style-type: none"> <li>Inspection of vehicles</li> <li>[PLANNED] Increase inspection and maintenance procedures</li> </ul>	<ul style="list-style-type: none"> <li>50% have prepared an audit plan and conduct audits according to the plan.</li> </ul>
Other Businesses: Treasury	- (No salient issue.)	(No salient issue.)	(No salient issue.)	All Thairoil affiliate strictly complied with amended laws.

1 Operations

2 Human Resources

3 Procurement

4 Customer Relations

5 CSR

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

**100%**

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

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

**38%**

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

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

**100%**

% of risk with mitigation or remediation process implemented

*(See Step 4 : Determine additional mitigation measures)*



## Human Rights Risk Assessment in Own Operations 2020

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

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

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

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



## **Human Rights in the Supply Chain**

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

Non-Crude Procurement		Crude Procurement		
Material Supplier Group	Service Supplier Group	International Oil Company (10)	Trader (18)	Shipping (17)
<ul style="list-style-type: none"> <li>- Electrical equipment and accessories (40)</li> <li>- General consumable and supply (147)</li> <li>- Instrument equipment and accessories (73)</li> <li>- IT and communication equipment (6)</li> <li>- Marine, offshore, and accessories (3)</li> <li>- Mechanical equipment (110)</li> <li>- Oil, chemical, and laboratory supply (70)</li> <li>- Pipe, valve, flange and fitting (32)</li> <li>- Safety equipment (25)</li> </ul>	<ul style="list-style-type: none"> <li>- Civil equipment and services (29)</li> <li>- Electrical and instrument and services (60)</li> <li>- General non-technical service (215)</li> <li>- General technical service (44)</li> <li>- IT and communication (45)</li> <li>- Mechanical engineering and service (70)</li> <li>- Piping engineering and service (5)</li> <li>- Manpower (8)</li> <li>- Consulting service (56)</li> <li>- Project management and engineering design (8)</li> <li>- Utility and intercompany (2)</li> </ul>			

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

- Suppliers' employees
- Suppliers' community members
- Third-party contracted labour, subcontractors, and suppliers onsite
- Customers and end consumers of suppliers
- Vulnerable groups ; *Children, Indigenous peoples, Migrant workers, Religious or ethnic minorities, Persons with disabilities, Women, elderly, patients and transgender*

# Steps 1 and 2 : Scope and screen relevant issues

## *Human Rights Issues Identified and Screened*

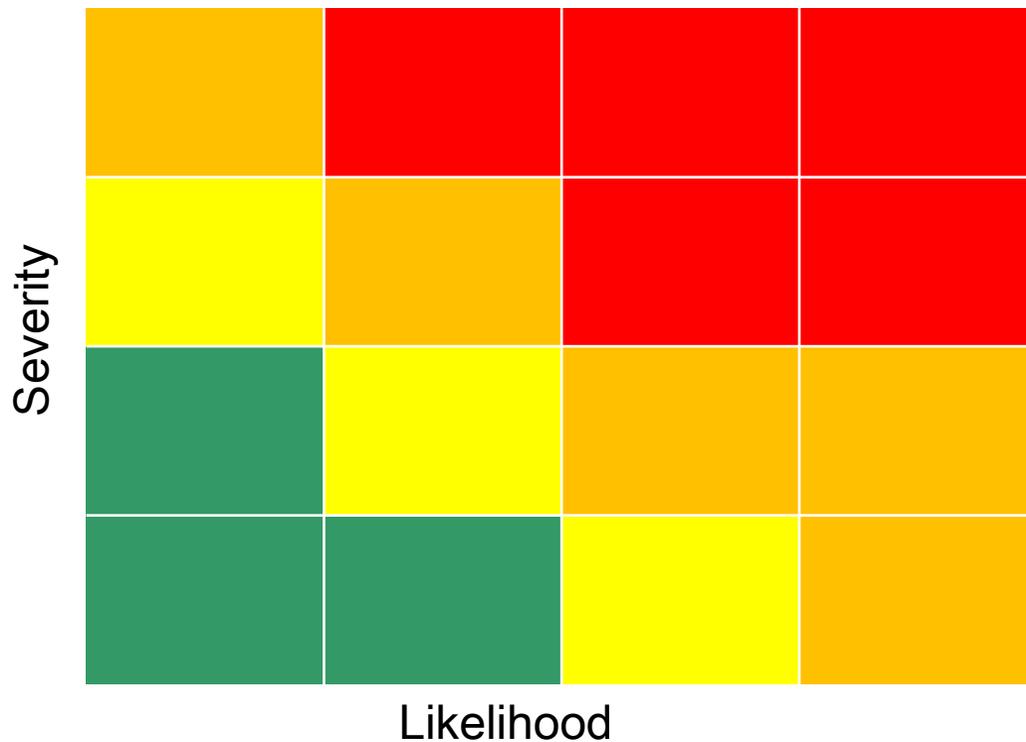
<i>Human Rights Issues</i>	Non-Crude Procurement		Crude Procurement		
	Material Supplier Group	Service Supplier Group	International Oil Company	Trader	Shipping
<i>Working Conditions</i>	✓	✓	✓	✓	✓
<i>Employee Health and Safety</i>	✓	✓	✓		✓
<i>Illegal Forms of Labour</i>	✓	✓	✓		✓
<i>Community Health and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

# Step 3 (1) : Assess residual risk levels

## Risk Assessment Matrix

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

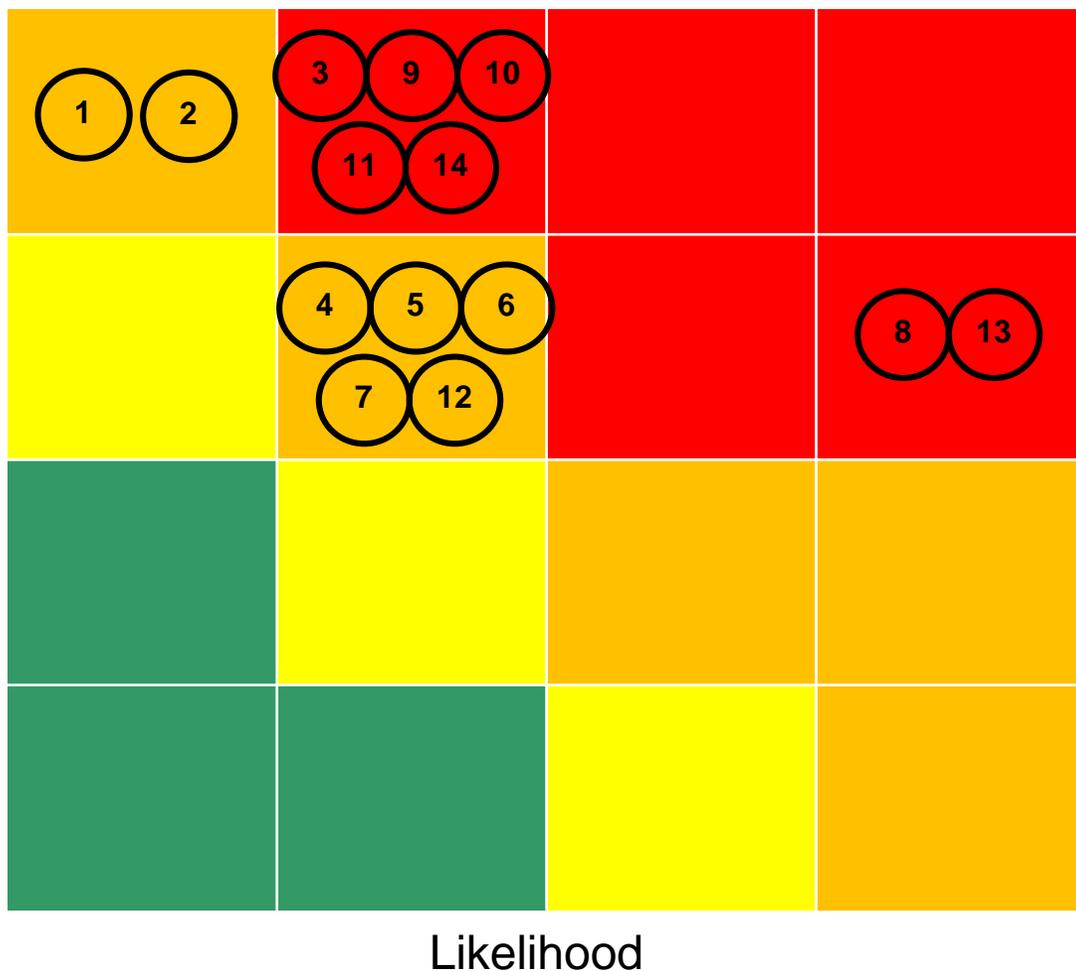
The assessment takes into account Thaioil vulnerable groups covers all Stakeholders, specifically our employees, Contractor, Sub-contractor, Community, Suppliers, Customers, women and children, Indigenous peoples, migrant workers, Religious or ethnic minorities, local community, Persons with disabilities,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



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

# Step 3 (2) : Assess residual risk levels

## Human Rights Salient Issues



NON-CRUDE PROCUREMENT		CRUDE PROCUREMENT	
<b>Marine, offshore, and accessories*</b>		<b>International Oil Company</b>	
1	Employee health and safety	10	Employee Health and Safety
<b>Mechanical equipment and accessories*</b>		11	Community Health and Safety
2	Employee Health and Safety	12	Community Standard of Living
<b>Oil, chemical, catalyst, and laboratory</b>		<b>Ship Owner</b>	
3	Employee health and safety	13	Working conditions
4	Community health and safety	14	Employee Health and Safety
<b>Civil equipment and services</b>		*Only manufacturers	
5	Employee health and safety		
<b>Mechanical engineering and service</b>			
6	Employee health and safety		
<b>Piping engineering and service</b>			
7	Employee health and safety		
<b>Project management and engineering</b>			
8	Working conditions		
9	Employee health and safety		

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

### *Human Rights Salient Issues and Mitigation Measures*

Supplier Type	Supplier Group	Human Rights Issue	Description of Risks	Mitigation Measures and Remediation Actions	Result Monitoring
Non-Crude Procurement	Marine, offshore, and accessories	Employee Health and Safety	<ul style="list-style-type: none"> <li>Accidents in transport (e.g., planes or shipping)</li> </ul>	<ul style="list-style-type: none"> <li>Supplier screening, audit, and self-assessments regarding safety</li> <li>[PLANNED] Follow up P.O. during the coronavirus pandemic</li> </ul>	<ul style="list-style-type: none"> <li>All Supplier strictly complied with amended laws and service agreement.</li> <li>In 2020, Thairoil revisited the ESG Plus Verification project in light of the COVID-19 pandemic, and adapted the approach for third party assessment towards the use of audit reports and certifications such as ISO 14001, ISO 18001, ISO 26000, ISO 20400, and CAC certification for verification. Based on this approach,                             <ul style="list-style-type: none"> <li>37 suppliers – 95% of high risk suppliers and 65% of critical suppliers – passed the verification.</li> </ul> </li> <li>Organizing meetings between contractors and Thairoil Group’s executives to reiterate the importance of safety in the workplace and prepare readiness for the major turnaround to ensure that tasks can be completed as planned;</li> </ul>
	Mechanical equipment and accessories	Employee Health and Safety	<ul style="list-style-type: none"> <li>Accidents in transport (e.g., planes or shipping)</li> </ul>	<ul style="list-style-type: none"> <li>Supplier screening, audit, and self-assessments regarding safety</li> <li>[PLANNED] Follow up P.O. during the coronavirus pandemic</li> </ul>	
	Oil, chemical, catalyst, and lab supply	Employee Health and Safety	<ul style="list-style-type: none"> <li>Inadequate safety equipment</li> <li>Chemical leaks</li> </ul>	<ul style="list-style-type: none"> <li>Supplier screening, audit, and self-assessments regarding safety</li> <li>Suppliers’ plans to install water curtain to prevent chemical leaks</li> <li>[PLANNED] Increase process safety inspection in supplier operations</li> <li>[PLANNED] Collect safety performance statistics from suppliers (e.g., TRIR)</li> </ul>	
		Community Health and Safety	<ul style="list-style-type: none"> <li>Chemical leaks</li> <li>Wastewater discharge</li> <li>Emissions</li> <li>Road accidents and other impacts from distribution and logistics activities</li> </ul>	<ul style="list-style-type: none"> <li>Communicate Thairoil’s policy regarding human rights and ESG</li> <li>[PLANNED] Increase process safety inspection in supplier operations</li> </ul>	

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

### Human Rights Salient Issues and Mitigation Measures

Supplier Type	Supplier Group	Human Rights Issue	Description of Risks	Mitigation Measures and Remediation Actions	Result Monitoring
Non-Crude Procurement	Civil equipment and service	Employee Health and Safety	<ul style="list-style-type: none"> <li>Accidents from use of machinery</li> </ul>	<ul style="list-style-type: none"> <li>Supplier screening, audit, and self-assessments regarding safety</li> <li>Subcontractors are provided with PPE and safety training</li> <li>[PLANNED] Prepare toolboxes for subcontractors and revisit number of safety officers</li> </ul>	<ul style="list-style-type: none"> <li>Other than directly providing recommendations to suppliers who have high risk levels and/or non-compliance with the SCOC, Thailoil also gives opportunities for suppliers to join other activities to promote capability and capacity in managing environmental, social, and governance (ESG) performance, such as:               <ul style="list-style-type: none"> <li>Inviting 52 key suppliers that have expressed interest through the annual supplier survey to listen to the SME Executive Briefing in the CAC SME Certification Project;</li> <li>Inviting 169 key suppliers to attend the PTT Group CG Day with PTT Group;</li> <li>Communicating CSR in Supply Chain through our website</li> <li>Communicating the Company's corporate vision, procurement principles, construction plans, approach to supplier performance evaluation and awards giving, Thailoil Group Supplier Code of Conduct and expectations relating to ESG aspects, as well as Thailoil's approach to circular economy, human rights in the supply chain, and corporate governance, during the annual supplier conference, in which the theme for this year is "Partner for Life";</li> </ul> </li> </ul>
	Mechanical engineering and service	Employee Health and Safety	<ul style="list-style-type: none"> <li>Accidents from use of machinery</li> </ul>	<ul style="list-style-type: none"> <li>Supplier screening, audit, and self-assessments regarding safety</li> <li>Subcontractors are provided with PPE and safety training</li> </ul>	
	Piping engineering and service	Employee Health and Safety	<ul style="list-style-type: none"> <li>Accidents from use of machinery</li> </ul>	<ul style="list-style-type: none"> <li>Supplier screening, audit, and self-assessments regarding safety</li> <li>Subcontractors are provided with PPE and safety training</li> </ul>	
	Project management and engineering design	Working Conditions	<ul style="list-style-type: none"> <li>Contractors missing payment to subcontractors</li> </ul>	<ul style="list-style-type: none"> <li>Grievance procedure and investigation</li> </ul>	
Employee Health and Safety		<ul style="list-style-type: none"> <li>Drinking while working</li> <li>Bringing lighters into working area</li> </ul>	<ul style="list-style-type: none"> <li>Supplier screening, audit, and self-assessments regarding safety</li> <li>Sending warning letters to suppliers with incidents</li> </ul>		

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

### *Human Rights Salient Issues and Mitigation Measures*

Supplier Type	Supplier Group	Human Rights Issue	Description of Risks	Mitigation Measures and Remediation Actions	Result Monitoring
Crude Procurement	International Oil Company	Employee Health and Safety	<ul style="list-style-type: none"> <li>Oil spills</li> </ul>	<ul style="list-style-type: none"> <li>Supplier Code of Conduct that covers human rights</li> <li>[PLANNED] Collecting information from suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Reviewing supplier evaluation results – which reflected supplier performance in meeting Thairoil’s expectations regarding work quality, occupational health and safety, and timeliness of product/ service delivery – and awarded certificates and plaques of honour to contractor companies who successfully fulfilled their duties during the 2020 major turnaround; and</li> <li>Organizing supplier relationship building activities to ensure that suppliers are aware of, understand, and follow Thairoil’s commitment regarding transparency in procurement processes, such as the No Gift Policy.</li> </ul>
		Community Health and Safety	<ul style="list-style-type: none"> <li>Oil spills</li> </ul>	<ul style="list-style-type: none"> <li>Supplier Code of Conduct that covers human rights</li> <li>[PLANNED] Collecting information from suppliers</li> </ul>	
		Community Standard of Living	<ul style="list-style-type: none"> <li>Impacts from oil spills to local economy (e.g., fishery)</li> </ul>	<ul style="list-style-type: none"> <li>Supplier Code of Conduct that covers human rights</li> <li>[PLANNED] Collecting information from suppliers</li> </ul>	
	Ship Owner	Working Conditions	<ul style="list-style-type: none"> <li>Long working hours and limited rest time and holidays due to unplanned changes in shipping schedules</li> </ul>	<ul style="list-style-type: none"> <li>Proper employee communication regarding potential scenarios where they may have to stay in the ship longer than planned</li> <li>Invest in increasing capacity to transfer crew members such that they may not have to remain on the ship longer than planned</li> </ul>	
		Employee Health and Safety	<ul style="list-style-type: none"> <li>Failure to properly conduct safety inspection of ships</li> <li>Inadequate safety equipment</li> </ul>	<ul style="list-style-type: none"> <li>Ensure strict compliance with safety procedures, especially regarding inspection of safety equipment</li> </ul>	

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

**100%**

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

*1,093 suppliers assessed / 1,093 active suppliers*

**24%**

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

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

**100%**

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

*(See Step 4 : Determine additional mitigation measures)*

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



## **Human Rights Risk Assessment in the Supply Chain 2020**

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

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

## Spotlight on issues

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

Spotlight on Human  
Right Mindset

Spotlight on  
COVID-19

# Spotlight on issues



In 2020, Thaioil Group developed our communications strategy and organized additional activities to promote human rights for our stakeholders.

We used the **“3 parts for fulfilling human rights”** framework, which includes:

## Part I = Ensuring education for all :

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



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



The screenshot displays the Thailoil Academy mobile application interface. At the top, there is a navigation bar with the Thailoil Academy logo, a search bar containing the text 'human rights', and user profile information for 'Matiwan Than...'. Below the search bar, the 'Content Type' filter is set to 'Online Course (3)'. The main content area shows three search results, each featuring a course card with a title, a brief description, and a 'Thailoil' logo. The first result is 'Human Rights for Sustainability : การติดตามตรวจสอบกระบวนการสิทธิมนุษยชน...'. The second is 'Human Rights for Sustainability : TOP Group Human Right Policy'. The third is 'Human Rights for Sustainability : Introduction to Human Rights'. On the left side of the screen, there is a vertical sidebar with various icons for navigation. A large promotional banner for 'Thailoil Academy' is overlaid on the left, featuring Thai text: 'เคยสงสัยมั๊ย ??? บริษัทเรามีการประเมินผลงานพนักงาน และวางแผนสายอาชีพเราอย่างไร THAILOIL ACADEMY แอปพลิเคชัน ครอบคลุมใจ', 'SCAN เลย', 'Performance Management System', 'Career And Development Plan', and 'ต้องการติดตั้ง application ลงมือถือ'. At the bottom of the banner, it says 'ด้วยความปรารถนาดีจากฝ่ายบริหารจัดการทรัพยากรบุคคลและองค์กร'.

In 2020, Thaioil Group developed our communications strategy and organized additional activities to promote human rights for our stakeholders.

We used the “3 parts for fulfilling human rights” framework, which includes:

## Part II = Improving mental health care:

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



### Health Meter

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



### Health Resilience

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



### Flexible Benefits

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



### PM4U Connected

For the PM4U Connected Project, Thaioil created a digital collaboration platform called “**Sab-Jam**” to foster close connections and promote an organizational culture that will contribute to employee happiness.

**SUKJAI PODCAST**

ชวนฟัง SUKJAI PODCAST ได้ทั้งความรู้ ได้ทั้งวิตามินใจ

**HOW TO GROUP OF PLAYLIST**

- 1. SUBSCRIBE YOUTUBE CHANNEL**
- 2. SELECT PLAYLIST**
- 3. STAY UPDATE BI-WEEKLY**

**Healthy Work-Life**  
Focus on resilience in the workplace e.g. mediation at the workplace, building happiness when burnout, creating empathy at work.

**Healthy Relationship**  
An insight or guidance about relationship including family, couple, friend, colleague and cyber friend.

**Healthy Brain**  
A process of consciously improving oneself in various aspects of life; for example; Self-esteem, Self-management, critical thinking.

**Healthy Mind**  
A podcast to help employees to manage anxiety, stress, insomnia, relax, focus and meditate.

**Healthy Financial**  
How to improve your money resilience & stay financially motivated

Listen on **Sukjai Youtube Channel**

Subscribe now!!

## Part III = Working with the right to health:

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

### Work from Home :

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

I-COVID CENTER

### COVID-19 Control Measures

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#### KEY OBJECTIVES

#### PEOPLE FIRST

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

Promote employee awareness in complying with all established measures, and encourage personal hygiene habits through initiatives such as handing out Hygiene Kits and establishing the I-COVID center

#### BUSINESS CONTINUITY

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

**3 Ps**

CORPORATE MEASURES (3 Ps)

#### SOCIAL CARE

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

- Establish a policy of no travel or transit to infected countries and locations
- Establish control measures for external onsite visits, such as Health Declaration, Self Monitoring, Physical Distancing
- Organize Work from Home initiatives and working through a Collaboration Platform

Cluster Mission Critical Activities - MCA; Operations Group and Engineering, to protect the operation areas that, if compromised, would pose business impacts



# THANK YOU



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