



HUMAN RIGHT DUE DILIGENCE : **HRDD**



As of 2025

BCPG Public Company Limited

BCPG Public Company Limited and its subsidiaries (“the Group”) are committed to adhering to the United Nations Global Compact (UN Global Compact), the ISO 26000 Social Responsibility standard, the Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Women’s Empowerment Principles (WEPs), and the National Action Plan on Business and Human Rights (NAP). This demonstrates our responsibility and builds confidence in conducting business with respect for human rights as a policy commitment to ethical corporate governance and social responsibility.

The Group has established a Human Rights Due Diligence (HRDD) process to monitor actual and potential human rights impacts arising from business activities throughout the value chain. This process aims to avoid, prevent, and mitigate impacts through inclusive engagement, ensuring that product and service generation, labor practices, vendor relations, workplace environment, and joint ventures do not result in adverse human rights impacts on stakeholders, while demonstrating social and environmental responsibility.

Furthermore, a comprehensive human rights risk assessment is conducted to identify preventive and mitigation measures across operations. The risk assessment criteria evaluate two factors: likelihood and severity of impact. It covers all aspects of human rights and includes all potentially affected stakeholder groups.

Based on the risk assessment results, the Group formulates control and mitigation measures for potential business impacts, alongside prevention and corrective guidelines, to ensure that human rights management within the organization operates effectively to control all relevant impacts.

Content

	หน้า
1. Policy Commitment.....	2
2. Human Rights Risk and Impact Assessment	2
3. Integrating and Acting upon Findings	5
3.1 Identification of Human Rights Issues	5
3.2 Human Rights Risk Assessment and Prioritization	7
3.3 Risk Assessment Results	8
3.4 Risk Management	9
4. Tracking and Communicating Performance.....	11
5. Remediation	12

Human Rights Due Diligence: HRDD

BCPG Public Company Limited and its group of companies (“the Group”) have conducted Human Rights Due Diligence as an ongoing risk management process. The purpose is to identify, prevent, mitigate, and account for how the Company addresses human rights impacts arising across its business activities, based on the 5-step Human Rights Due Diligence process under the United Nations Guiding Principles on Business and Human Rights (UNGP).

Human Rights Due Diligence Process



1. Policy Commitment

The Group is committed to respecting the human rights of all stakeholders by adhering to international human rights principles and labor standards, including the Universal Declaration of Human Rights (UDHR) and the United Nations Guiding Principles on Business and Human Rights (UNGPs). This encompasses anti-human trafficking, the prohibition of forced labor and child labor, non-discrimination, prevention of all forms of harassment or sexual harassment, freedom of association, the right to collective bargaining, equal remuneration, and other relevant human rights aspects.

Furthermore, the Company has announced its Business Responsibilities on Human Rights Policy, which comprehensively reflects international human rights principles and labor standards. The scope of this policy outlines the Company's expectations regarding human rights compliance not only across its direct operations, but also extending to its subsidiaries and business partners. Further details regarding the Human Rights Policy are available on the Company's website.

2. Human Rights Risk and Impact Assessment

The Group conducts human rights risk assessments to identify actual and potential risks arising from its direct operations or linked through its business relationships. These assessments consider both internal and external stakeholder groups who may be directly or indirectly affected by the Company's business activities throughout the value chain.

Furthermore, the human rights risk assessment process accounts for vulnerable groups—such as forced labor, women, children, indigenous peoples, migrant workers, third-party contract workers, and local communities—that may be impacted by business activities. It also covers risk issues regarding equal remuneration and non-discrimination. The human rights risk assessment encompasses 100% of the Company's business operational sites in Thailand, totaling 22 operational areas.

The human rights risk assessment categorizes key affected groups into four main categories:

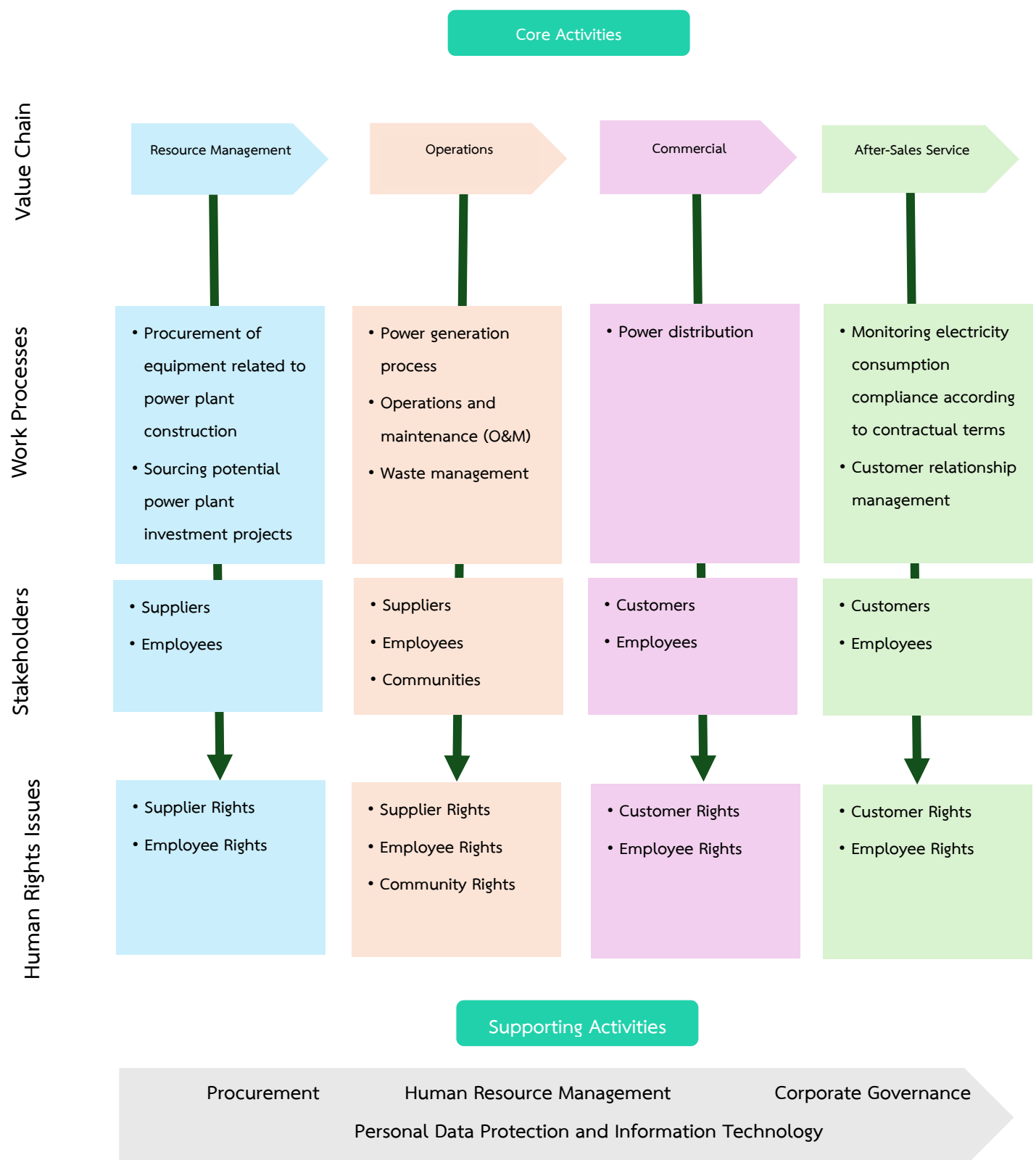
- **Employees**
- **Suppliers**
- **Customers**
- **Communities**

This framework covers both core and support business processes, with details provided in the Identification and Materiality Assessment of Human Rights Impacts section.

The human rights risk assessment encompasses all business activities in Thailand.

Company Name	Location	Risk Assessment Status
1. BCPG Public Company Limited ("BPI")	Bang Pa-in District, Phra Nakhon Si Ayutthaya Province	✓
2. BCPG Public Company Limited ("WPPB")	Phra Phutthabat District, Saraburi Province	✓
3. BCPG Public Company Limited ("WTMG")	Tha Muang District, Kanchanaburi Province	✓
4. Bangchak Solar Energy Co., Ltd. ("CPM1")	Bamnet Narong District, Chaiyaphum Province	✓
5. Bangchak Solar Energy Co., Ltd. ("BNN")	Bamnet Narong District, Chaiyaphum Province	✓
6. Bangchak Solar Energy Co., Ltd. ("BPH")	Bang Pahan District, Phra Nakhon Si Ayutthaya Province	✓
7. Bangchak Solar Energy (Buriram) Co., Ltd. ("BRM")	Prakhon Chai District, Buriram Province	✓
8. Bangchak Solar Energy (Buriram 1) Co., Ltd. ("BRM 1")	Nong Ki District, Buriram Province	✓
9. Bangchak Solar Energy (Nakhon Ratchasima) Co., Ltd. ("NMA")	Dan Khun Thot District, Nakhon Ratchasima Province	✓
10. Bangchak Solar Energy (Prachinburi) Co., Ltd. ("PRI")	Kabin Buri District, Prachinburi Province	✓
11. Bangchak Solar Energy (Prachinburi) Co., Ltd. ("CWSC")	Wiset Chai Chan District, Ang Thong Province	✓
12. Bangchak Solar Energy (Prachinburi) Co., Ltd. ("CBPI")	Bang Pa-in District, Phra Nakhon Si Ayutthaya Province	✓
13. Bangchak Solar Energy (Prachinburi) Co., Ltd. ("CAYA")	Phra Nakhon Si Ayutthaya District, Phra Nakhon Si Ayutthaya Province	✓
14. BSE Power (Kanchanaburi) Co., Ltd. ("BSP-KAN")	Bo Phloi District, Kanchanaburi Province	✓
15. BSE Power (Kanchanaburi 1) Co., Ltd. ("BSP-KAN1")	Bo Phloi District, Kanchanaburi Province	✓
16. BSE Power (Lopburi) Co., Ltd. ("BSP-LOP")	Khok Samrong District, Lopburi Province	✓
17. BSE Power (Prachinburi) Co., Ltd. ("BSP-CPRS")	Mueang Prachinburi District, Prachinburi Province	✓
18. BSE Power (Udon Thani) Co., Ltd. ("UTH")	Si That District, Udon Thani Province	✓
19. BSE Power (Phet Nakhon) Co., Ltd. ("WCB")	Wichian Buri District, Phetchabun Province	✓
20. BSE Power (Phet Nakhon) Co., Ltd. ("KAT")	Phipun District, Nakhon Si Thammarat Province	✓
21. BCPG Wind (Ligor) Co., Ltd. ("LLG")	Pak Phanang District, Nakhon Si Thammarat Province	✓
22. Asia Link Terminal Co., Ltd. ("ALT")	Ban Laem District, Phetchaburi Province	✓

Identification and Materiality Assessment of Human Rights Impacts



3. Integrating and Acting upon Findings

The Group analyzes and integrates human rights assessment results into its internal management practices upon completing risk assessments, establishing risk management plans by applying standards and guidelines—such as the Code of Practice (CoP) and the Security, Safety, Health, and Environment (SSHE) Management System—to mitigate or control potential impacts. The process for analyzing and integrating human rights assessment findings consists of the following steps:

3.1 Identification of Human Rights Issues

Identification of human rights issues relevant to the Company's business activities covers both core and support business processes. The scope of human rights and associated definitions applied by the Company are detailed in the table below:

Scope of Human Rights Risk Assessment			
Employee Rights	Supplier Rights	Customer Rights	Community Rights
• Discrimination against employees • Occupational health and safety • Personal data protection • Freedom of association and collective bargaining • Fair and legal employment	• Discrimination against suppliers • Occupational health and safety • Personal data protection • Labor auditing and legal employment	• Occupational health and safety • Personal data protection	• Occupational health and safety • Access to water and sanitation • Land acquisition
Employee Rights			
• Non-Discrimination: Equal treatment of all employees, including equal and fair remuneration, without discrimination based on ethnicity, skin color, gender, religion, geographic origin, educational institution, political opinion, or any other criteria. • Occupational Health and Safety: Management of occupational health and safety for employees across company premises and operational sites, including initiatives to promote awareness, access, and assistance regarding health and safety practices for all employees. • Employee Personal Data Protection: Safeguarding employees' personal data from infringement, supported by guidelines for managing and protecting data privacy.			

Scope of Human Rights Risk Assessment
● Freedom of Association and Collective Bargaining: The right of employees to associate freely and bargain collectively for fair employment benefits. ● Lawful Employment Practices: Full compliance with labor laws, including the total prohibition of forced labor, child labor, and human trafficking.
Customer Rights
● Non-Discrimination against Customers: Guidelines and practices ensuring equal treatment of all customers without discrimination, fully respecting individual equality. ● Customer Service and Data Protection: Fair service management, understanding customer needs, and providing effective guidance and problem resolution. This includes conducting customer satisfaction surveys to drive continuous service improvement, as well as protecting customer data from privacy violations.
Community Rights
● Community Health and Safety: Operational measures to prevent negative impacts on community health and safety, such as avoiding company-related accidents and minimizing pollution in surrounding communities. ● Access to Water and Sanitation: Ensuring operations do not obstruct community access to clean water resources, such as avoiding water source blockages or over-extracting local water supplies that could induce droughts. ● Land Acquisition: Conducting impact assessments prior to project development to prevent human rights violations, land rights infringements, or encroachment on lands historically occupied by local communities.

3.2 Human Rights Risk Assessment and Prioritization

Human Rights Risk Assessment Criteria

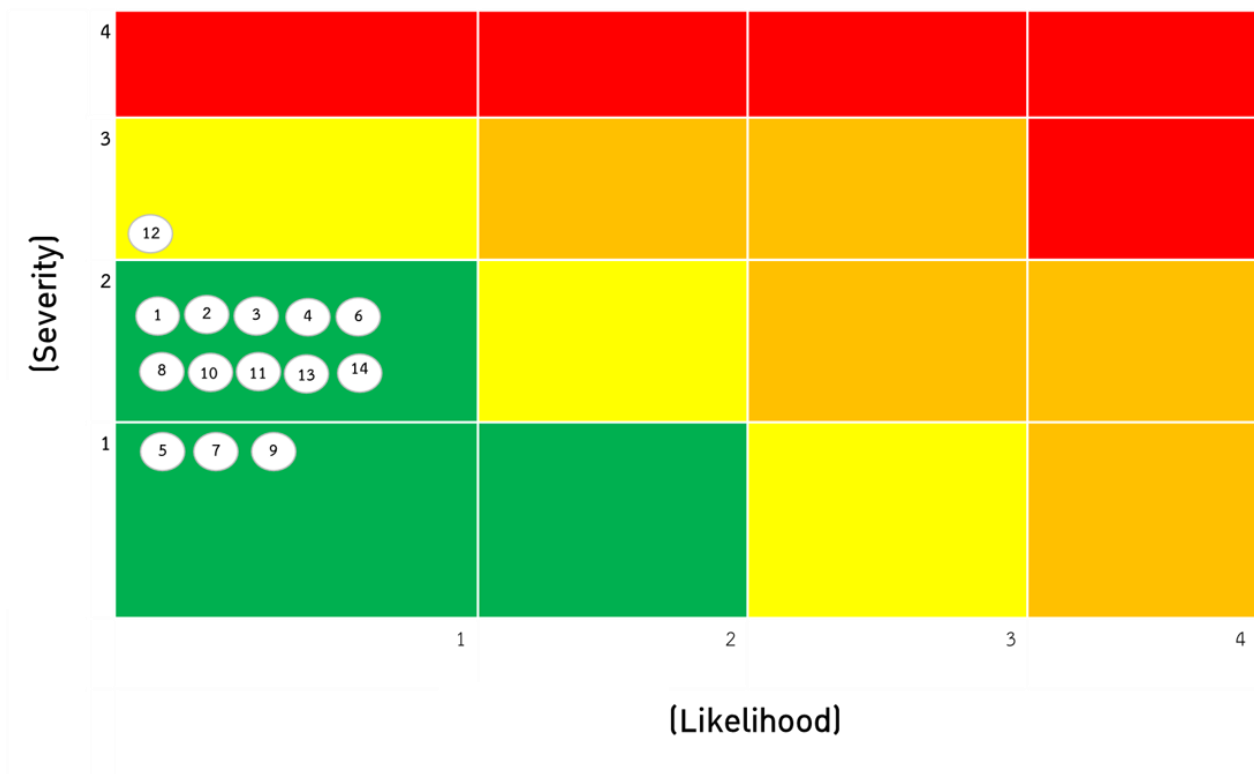
Risk Level	Likelihood (Frequency) (X)	Impact (Y)		
		Level/Scale	Scope/ Number of Affected Stakeholders	Remendability
(4) Very High	(4) Occurred very frequently in past operations.	Confirmed non-compliance with applicable laws resulting from grievances or human rights violations, requiring additional remedial action plans or mediation by independent external entities.	Affects > 2 stakeholder groups.	Remedy to restore affected stakeholders to their pre-impact state requires > 3 years.
(3) High	(3) Occurred several times in past operations.	Human rights grievances or violations identified that do not violate laws and can be resolved or mitigated through existing grievance mechanisms.	Affects 2 stakeholder groups	Remedy to restore affected stakeholders to their pre-impact state requires > 1 – 3 years.
(2) Medium	(2) Occurred occasionally in past operations.	Human rights concerns raised by stakeholders that cannot be resolved at the operational site level.	Affects 1 stakeholder group.	Remedy to restore affected stakeholders to their pre-impact state requires ≤ 1 year
(1) Low	(1) Hardly ever occurred in past operations.	Human rights concerns raised by stakeholders that can be resolved at the operational site level.	No impact on stakeholders.	No effect / Not applicable.

Note: The Human Rights Risk Assessment Criteria are aligned with the Enterprise Risk Assessment Criteria for 2025.

3.3 Risk Assessment Results

Based on the human rights risk assessment conducted across 22 operational areas of the Company, human rights risks were evaluated at low-to-moderate levels. The Company has established mitigation and rehabilitation guidelines for key human rights risk issues relevant to its business operations, as detailed in the "Preventive and Impact Mitigation Measures for Human Rights Risk Issues" section.

Risk Heat Map



Human Rights Issues

Employee Rights	Supplier Rights	Customer Rights	Community Rights
1. Non-Discrimination against Employees	6. Non-Discrimination against Suppliers	10. Occupational Health and Safety	12. Community Health and Safety
2. Occupational Health and Safety	7. Occupational Health and Safety	11. Personal Data Protection	13. Access to Water and Sanitation
3. Personal Data Protection	8. Personal Data Protection		14. Land Acquisition
4. Freedom of Association and Collective Bargaining	9. Labor Audit and Lawful Employment Practices		
5. Lawful Employment Practices			

3.4 Risk Management

The Group analyzed 14 potential human rights risk areas to assess their impact and developed preventive and mitigation measures as follows:

Preventive and Mitigation Measures for Human Rights Risks

Employee Rights	
Human Rights Issues	Preventive and Mitigation Measures
1. Discrimination against employees	✓ Comply with the Human Rights Policy and the Labour Protection Act.
2. Occupational health and safety	✓ Convene regular Occupational Safety, Health, and Working Environment Committee meetings to ensure safety measures meet established standards.
3. Personal data protection	✓ Strictly adhere to ISO 45001 and ISO 14001 requirements.
4. Freedom of association and collective bargaining	✓ Provide annual health check-ups for employees based on risk factors.
5. Legal labor employment	✓ Comply with the Personal Data Protection Policy.
	✓ Hold Welfare Committee meetings to gather feedback and implement beneficial welfare initiatives for employees.

Suppliers Rights	
Human Rights Issues	Preventive and Mitigation Measures
1. Discrimination against employees	✓ Criteria for supplier selection and procurement procedures are established in accordance with standard operating procedures.
2. Occupational health and safety	✓ Supplier training is provided prior to site entry to ensure safe operations within power plant premises.
3. Personal data protection	✓ Employment terms and conditions require suppliers to strictly adhere to plant regulations and requirements, including holding valid work permits and complying with ISO 45001, ISO 14001, and the Code of Practice (CoP).
4. Legal labor employment	✓ Supplier self-assessments regarding permits and health readiness are required for high-risk work, such as working in confined spaces or working at heights.
	✓ Environmental performance is monitored through company-defined supplier audits; if a supplier fails to comply with the specified standards, personnel replacement or selecting new suppliers will be considered.

Customer Rights	
Human Rights Issues	Preventive and Mitigation Measures
- Occupational Health and Safety - Personal Data Protection	✓ Transparent and easily accessible grievance mechanisms are provided across all channels, with procedures in place to investigate, resolve, and follow up on complaints. ✓ Customer screening processes are conducted in accordance with legal requirements. ✓ Customer satisfaction surveys are conducted. ✓ Personal Data Protection Policy is strictly adhered to.

Community Rights	
Human Rights Issues	Preventive and Mitigation Measures
- Occupational Health and Safety - Access to Water and Sanitation - Land Acquisition	✓ Electricity generation and factory operating license conditions are strictly complied with. ✓ Code of Practice (CoP) guidelines are strictly followed, along with environmental quality monitoring and measurements for regulatory oversight. ✓ ISO 45001 and ISO 14001 standards are strictly adhered to, with continuous reviews and improvements to align with the organizational context. ✓ Water source studies are conducted prior to commercial operations, with raw water reservoir capacities designed to adequately supply the power plant year-round. ✓ Water usage and abstraction permits from public water sources are legally obtained, strictly following specified pumping schedules and volume limits. ✓ Legal assessments are conducted prior to land acquisition, alongside public hearings and transparent communication of operational processes to local communities.

4. Tracking and Communicating Performance

The Group monitors, tracks, and reports on human rights performance, establishing appropriate timelines for tracking and evaluation based on the specific context of each project plan. Audits are conducted to ensure the effectiveness of management processes, and performance outcomes, as well as management results, are disclosed to stakeholders to prevent potential negative impact risks arising from corporate activities. Human rights risk assessments are reviewed periodically every year through the Human Rights Impact Assessment (HRIA) process, and related documentation is regularly updated.

In 2025, performance key metrics were as follows:

- 100% of the company's business operations and activities in Thailand were evaluated through human rights risk and impact assessments.
- 100% of business operations and activities identified with human rights risks had mitigation measures and grievance mechanisms in place.
- In 2025, zero (0) cases or lawsuits involving human rights violations occurred, including anti-human trafficking, forced labor, child labor, discrimination, all forms of sexual harassment or abuse, freedom of association, collective bargaining rights, equal remuneration, and other human rights aspects.

Furthermore, the company annually reports its human rights performance via the Annual Report (Form 56-1 One Report), the Annual Sustainability Report, and the corporate website. Communication channels catered to all stakeholder groups are maintained, alongside grievance and whistleblowing channels for reporting any alleged human rights violations or discrimination resulting from business operations. Investigations into impacts are carried out through whistleblowing procedures or other mechanisms—such as negotiation, mediation, and remediation—ensuring legitimacy, accessibility, fairness, alignment with human rights principles, and strict confidentiality via the channels specified below:

Whistleblowing and Grievance Channels:

- Corporate Website: www.bcpgroup.com
- Sealed Letter: Addressed to the Audit Committee Chairman at the Corporate Headquarters address:
BCPG Public Company Limited, No. 2098, M Tower, 12th Floor, Sukhumvit Road, Phra Khanong Tai Subdistrict, Phra Khanong District, Bangkok 10260
- E-mail:
 - auditcommittee@bcpgroup.com (Head of Internal Audit Office)
 - ico@bcpgroup.com (Audit Committee)
 - cg@bcpgroup.com (Chairman of the Board, Chairman of the Corporate Governance Committee, and Company Secretary)
- Telephone: Head of Internal Audit Office at Tel: +66 2 335 8906

5. Remediation

The Group is committed to mitigating potential risks and violations by conducting regular human rights risk assessments to identify rights violation scenarios within business activities. Remedial measures for human rights impacts are maintained through formal grievance mechanisms when it is determined that the company has caused or contributed to adverse human rights impacts. Prompt corrective actions are executed to prevent rights violations. In the event of a human rights violation, the company adheres to a fair investigation process with the following procedures:

Corrective Action and Remediation

If any business activity is found to cause, contribute to adverse impacts, or violate human rights, corrective action or remediation will be carried out through appropriate negotiation processes. Immediate access to remedy is considered to ensure affected individuals receive effective remedies aimed at restoring damaged circumstances to an appropriate or improved state (e.g., formal apologies, financial or non-financial compensation, or restitution).

Suspension During Investigation

1. The company may suspend an employee accused of misconduct during the investigation process. The suspension order shall be issued in writing, specifying the offense and a suspension period not exceeding 7 days, with payment of not less than 50% of the working-day wages received prior to suspension. The employee shall be notified prior to the suspension taking effect.
2. If the investigation concludes that the employee is not guilty, the company shall pay the remaining wage portion withheld during the suspension period, together with interest at 15% per annum.

Disciplinary Actions

To correct and improve employee behavior, the company will consider disciplinary actions according to the severity of the offense, which may include any of the following measures:

1. Verbal warning
2. Written warning
3. Suspension:
 - Unpaid suspension for 3 days
 - Unpaid suspension for 7 days
4. Termination with or without severance pay, depending on the case
5. Dismissal without severance pay and other benefits