

GPSC Human Rights Risk Assessment 2021



Table of Content

- The 5 Steps of Human Rights Risk Assessment.....p.3
- Planning & Scoping.....p.4
 - 26 Human Rights Issues
 - The 9 Affecting Stakeholder Groups
- Data Collection and Baseline Development.....p.6
 - Site Coverage
- Risk Assessment.....p.7
 - Human Rights Matrix
 - Identified Human Rights Risk
 - Results
 - Risk Description
 - Example
- Impact Mitigation & Remediation Plan.....p.13
- Reporting & Evaluation.....p.16
- Annex.....p.17
 - Example of Human Rights Risk Register
 - Example of Human Rights Assessment in Tier-1 Suppliers
 - List of operation and joint venture

Human Rights Risk and Impact Assessment Methodology

The 5 Steps of Human Rights Risk Assessment



Human Rights Risk and Impact Assessment Methodology

1. Planning & Scoping: 26 Human Rights Issues

Labor Rights	Community Rights	Supply Chain	Security and Safety	Environment	Consumer Rights
<ul style="list-style-type: none"> Freedom of association and Collective bargaining Forced and Compulsory labor Child Labor Discrimination Harassment Human trafficking Equal remuneration Other rights such as favorable working conditions Working hours 	<ul style="list-style-type: none"> Standards of living and quality of life Community health and safety Community engagement Cultural heritage Minorities Including Indigenous Peoples and Resettlement 	<ul style="list-style-type: none"> Supplier engagement Supplier code of Conduct 	<ul style="list-style-type: none"> Security Management Security training Health safety 	<ul style="list-style-type: none"> Water security Impact of pollution Waste and hazardous materials management Preservation of biodiversity Broadening access to energy 	<ul style="list-style-type: none"> Consumer health and safety Data privacy

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1. Planning & Scoping: The 9 Affecting Stakeholder Groups

Group 1 Shareholders

Group 2 Investors

Group 3 Government agencies and institutions

Group 4 Employees

Group 5 Supplier and contractors

Group 6 Partners/Join Ventures

Group 7 Customers

Group 8 Communities and society

Group 9 Vulnerable groups:

- Women
- Elderly
- People with disability
- Children
- Indigenous people
- Migrant labor
- Third-party contracted labor
- Local communities
- Others such as LGBTQI and religious minority

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2. Data Collection and Baseline Development: Site Coverage

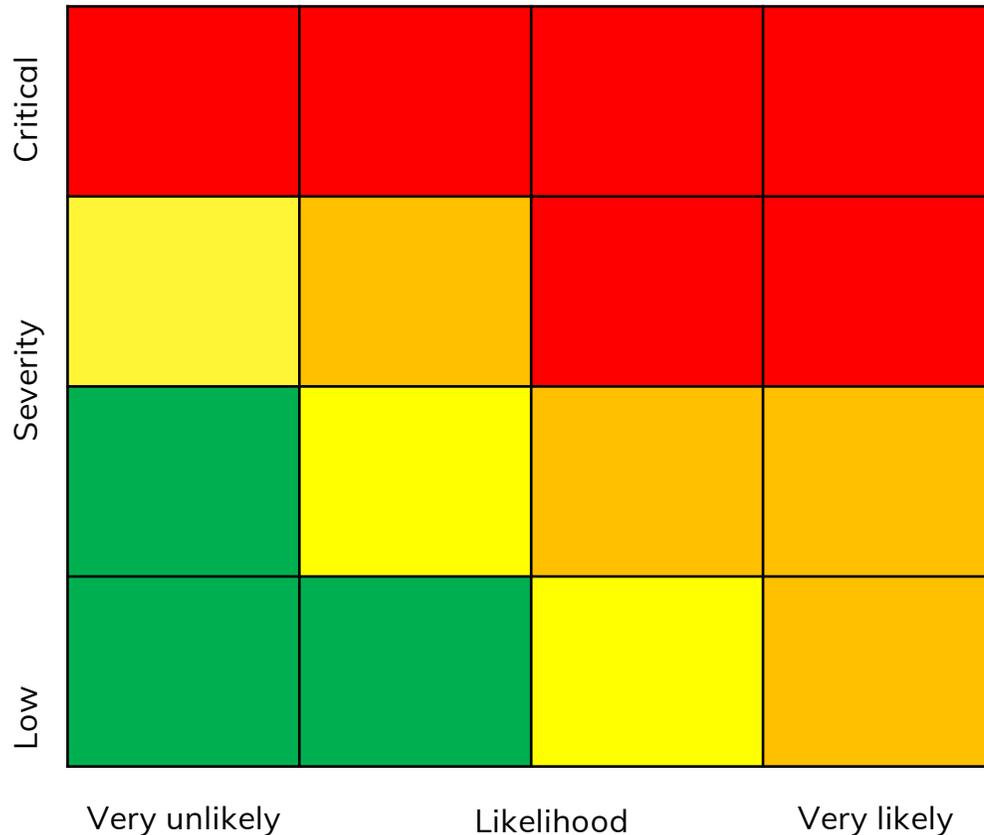
	% site of total assessed in last three years
Own Operation	100
Contractor Tier 1 Supplier	100
Joint Venture	100

Within the last three years (since 2018), GPSC Group assessed all sites (100%) where GPSC group operates, including GPSC own operation, contractors and tier 1 suppliers, and joint venture.

In 2021, GPSC conducted also the human rights assessment of all operating locations. And, we create the mitigation and remediation plans for all levels of risks, from low risk to high risk. For mitigation plan, we creating additional measure to control over the risk.

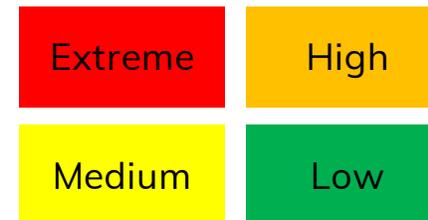
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3. Risk Assessment: Human Rights Matrix



GPSC uses the human rights matrix (see the figure) to assess the human rights risks of the nine affecting stakeholders on 26 human rights issues, for all the GPSC sites. The human rights matrix consists of severity (y-axis) and likelihood (x-axis). (Please see annex for likelihood and severity criteria).

Level of risks



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3. Risk Assessment: Identified Human Rights Risk



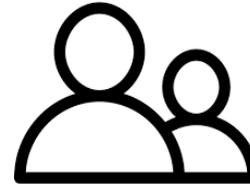
Employees:

- Health and safety
- Working conditions
- Discrimination
- Freedom of expression and association
- The right to collective bargaining



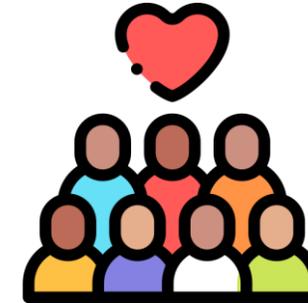
Business Partners Suppliers and Contractors:

- Illegal forms of labour
- Health and safety
- Working conditions
- Security forces
- Data privacy



Customer:

- Customer's data privacy
- Customer health and safety

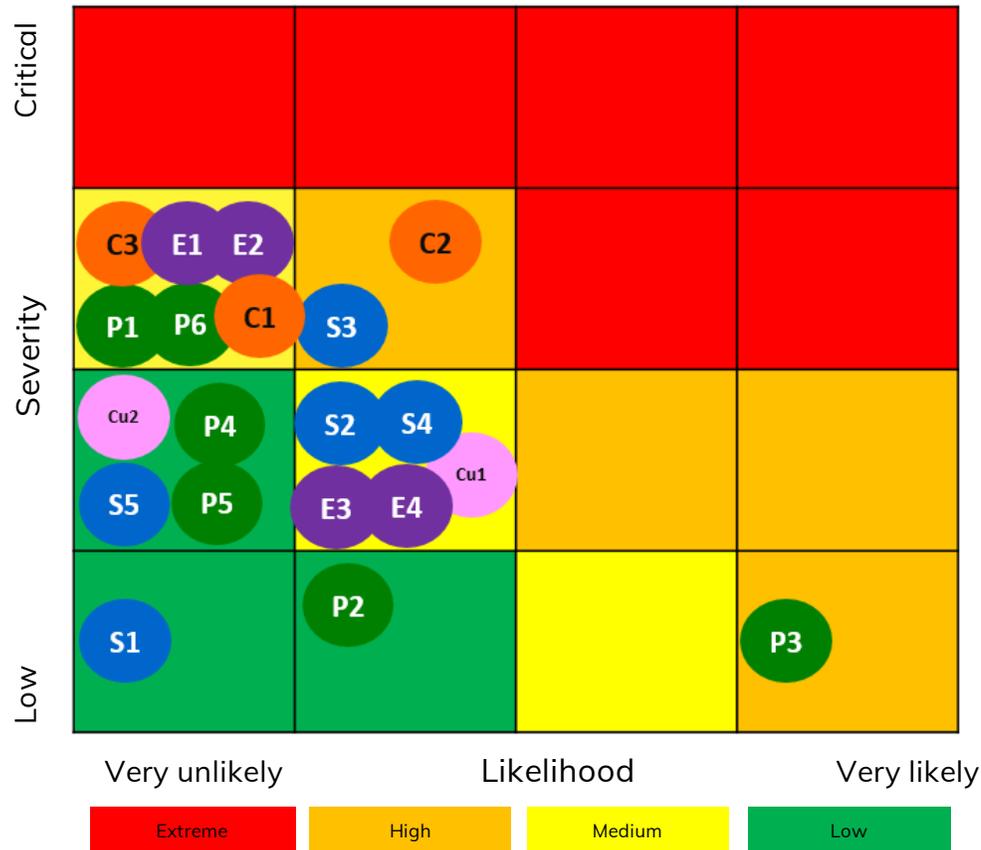


Community and Society:

- Community health and safety
- Water conflict
- Water pollution
- Noise pollution
- Air pollution
- Waste management
- Hazardous waste management

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3. Risk Assessment: Results in 2021



Employee
 E1 = Working conditions
 E2 = Safe and health working conditions
 E3 = Discrimination
 E4 = Freedom of association

Communities
 C1 = Standard of living and quality of life
 C2 = Community health and safety
 C3 = Community engagement

Supply Chain
 S1 = Working conditions of suppliers
 S2 = Safe and health working conditions of suppliers
 S3 = Illegal forms of labor
 S4 = Security and safety personnel practices
 S5 = Data privacy for suppliers

Environmental Health Security and Safety
 P1 = Community Safety
 P2 = Water Pollution
 P3 = Noise pollution
 P4 = Air pollution
 P5 = Waste

The results of risk assessment of human rights showed zero salient or extreme issues (very likely likelihood and critical severity). Nonetheless, our human rights risk assessment revealed three high risk of human rights issue:

- Illegal form of labour (S3)
- Community Health and Safety (C2)
- Noise Pollution (P3)

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3. Risk Assessment: Risk Description

Risk	Description of Impact
Illegal form of labour (S3)	<ul style="list-style-type: none">Construction and maintenance are areas of risk for the use of migrant labour. Other business partners supplying equipment and materials may also be at risk of other illegal forms of labour. Use of illegal forms of labour are human rights risks, as the workforce (i.e. child labour, migrant labour, forced labour) do not have the ability to argue for their rights.
Community Health and Safety (C2)	<ul style="list-style-type: none">Any GPSC business activities that affect community health and safety. For example, a poor waste management of GPSC might lead to communicable disease in the communities nearby. Another example is the transportation accidents from GPSC logistic. The latter example produce a ripple effect to customers who receives lower product quality as a results of the transportation accident.
Noise Pollution (P3)	<ul style="list-style-type: none">Throughout company's activities, from construction, operation to maintenance, noise can be generated. Improper control of noise could lead not only to health risks but also conflict with local communities. The noise may also be regarded as a disturbance to animals inhabiting in those areas as well.

Human Rights Risk and Impact Assessment Methodology

3. Risk Assessment: Risk Register Example

No.	Human rights issue	Description of impact	Existing Control	Type	Start		Mitigation Plan	Time Frame		Responsible Person
					L	H		From	To	
Labor Rights										
1	Safe and Healthy Working Conditions	There is a variety of health and safety risks in the development and maintenance of the power plant. In the power plant, employees are exposed to physical health and safety risks including both accidents and conditions developed over time. Examples include electrocution, heatstroke, hand arm vibration syndrome (HAVS), and exposure to chemicals. In the office, employees may be exposed to less immediate health and safety risks such as ergonomic injuries. Psychological health and safety risks are also present, such as overstress.	<ul style="list-style-type: none"> - Welfare Committee - First Day Orientation - GPSC Annual Training Plan - คู่มือจัดการทำงานเป็นไปตามกฎหมาย - Employee Code of Conduct - EHS - Health & medical care procedure - คณะกรรมการความปลอดภัย - Employee Medical Expense Reimbursement procedure 		1	3	<ul style="list-style-type: none"> - Continuously enhance awareness raise and train all employees that they must work and behave safely. - 'Low residual risk. GLOW should continue with its existing human rights controls 			Supattra, Supaporn, Anchana, Salida
2	Working conditions	Employees' rights may be violated if they are not granted fair working conditions, including but not limited to fair compensation, access to leave, social security, and tasks that do not exceed the job description. As work in the power plant can often expand beyond normal working hours during the day, and can often extend for long periods, particular attention must be paid proper overtime compensation and the scope of the job description.	<ul style="list-style-type: none"> - Employee Code of Conduct - Human Rights Policy - Compliance with local regulation - Grievance mechanisms - Whistle blowing system - Employee Manual - OT monitoring and approval by Supervisor and HR - Participation in forum for leading companies in power & utilities sector - Employee Engagement Survey and bring result into Improvement action plan of each department - Employment Contract that align with Thai Labor Law - Provide Welfares and Benefits to Employee and thier family which exceeding from minimum requirement of Thai Labor Law - Employee Self Services System that can access to thier own personal data ie. compensation, leave. - คู่มือจัดการทำงานเป็นไปตามกฎหมาย 		1	3	<ul style="list-style-type: none"> - Continuously monitor all HR activities to ensure alignment of Laws and Company Regulation - 'Low residual risk. GLOW should continue with its existing human rights controls 			Supattra, Supaporn, Anchana, Salida

On every site, GPSC examined the measure to prevent the stakeholders from human rights risk. In the risk register document, we, together with human rights specialists, then evaluated the likelihood and severity of each human rights risk. For the risk that is extreme or high, we would come up with additional measure.

Human Rights Risk and Impact Assessment Methodology

3. Risk Assessment: Results

Category	% site of total assessed in last three years	% site of total assessed where risks have been identified	% of site risk with mitigation actions taken
Own operation (% of sites)	100	0	100
Contractors and Tier 1 suppliers (as a % of Tier 1 Suppliers)	100	0	100
Joint Venture (as a % of joint ventures)	100	0	100

With these three high risks of human rights, GPSC has implemented mitigation plans, together with remediation actions, to reduce future impact and recover the affecting stakeholders on every site.

Previous Human Rights Due Diligence:



Human Rights Risk and Impact Assessment Methodology

4. Mitigation and Remediation Plans: Illegal form of labour (S3)

Existing Measure	Mitigation	Remediation
<ul style="list-style-type: none"> • Procurement Policy • Supplier Code of Conduct • Supplier Auditing • Supplier Contract Management • Better coal code • Warning letters • Data Privacy & Protection Act (Partial control) 	<ul style="list-style-type: none"> • Develop a Sustainable Sourcing Policy with explicit mention of Human Rights topics (i.e. prohibition of the use of illegal forms of labour) Please see an example of Unilever's Responsible Policy (https://www.unilever.com/Images/responsible-sourcing-policy-interactive-final_tcm244-504736_en.pdf) • Conduct initial due diligence for selected high-risk suppliers • Integrate sustainability questions into a pre-qualification process • Conduct supplier audit through self-assessment, site visits, depending on levels of risk associated with suppliers • Establish timeframes (audit plan) for monitoring based on the activities and level of risks associated with the supplier • Provide capacity building for non-conformance suppliers • Revise Corporate Supplier Code of Conduct and Standard T&Cs 	<ul style="list-style-type: none"> • GPSC Group provides compensation in forms of financial and non-financial to alleviate affected employees respecting human rights.

Human Rights Risk and Impact Assessment Methodology

4. Mitigation and Remediation Plans: Community Health and Safety (C2)

Existing Measure	Mitigation	Remediation
<ul style="list-style-type: none"> • Emergency drills • Grievance plan • External communications procedure • Communication with the communities on the topics of environmental management and operation via multiple channels: <ul style="list-style-type: none"> • Open House, Knock door visit, and dinner talk activities • Power plant funding committee • Tripartite committee • Community leaders • CSR action plan both long-term and short-term • CSR activities • Community satisfaction survey • Community association • Eco factory, green industry, and carbon certification • Cooperation with others association, e.g., Environmental Monitoring, MPR, and AIE-CSR 	<ul style="list-style-type: none"> • Maintenance equipment on a regular basis • Operating the equipment according to handbooks • Employee training programs to increase safety • Communication during emergency drill • Having the sparing parts of equipment at the right amount 	<ul style="list-style-type: none"> • GPSC Group provides compensation in forms of financial and non-financial to alleviate affected employees respecting human rights.

Human Rights Risk and Impact Assessment Methodology

4. Mitigation and Remediation Plans: Noise Pollution (P3)

Existing Measure	Mitigation	Remediation
<ul style="list-style-type: none"> • Install buffer to reduce noise pollution emitted to outside • Develop low-noise technology • EIA & EHIA Mitigation & monitoring plan • Health & Safety policy • Environmental policy • Crisis management & emergency communication policy • External communication Policy • Emergency response plan (HO/ plan site) • Stop Work Authority (SWA) • Permit to work (Procedure & Training) • EHS term & condition in every supplier contract • KYC (Know your customer) • Health & Safety standards • Managing Rule Breaking (MRB) Principle & Training • Safety Culture Survey 	<ul style="list-style-type: none"> • Strictly followed the mitigation measures and monitoring measures. Actions are subject to impact alleviation and monitoring measures established by third parties. 	<ul style="list-style-type: none"> • GPSC Group provides compensation in forms of financial and non-financial to alleviate affected employees respecting human rights.

Human Rights Risk and Impact Assessment Methodology

5. Reporting & Evaluation

- Please visit GPSC website as we continuously update the results of our human rights due diligence and other the human rights details in relation to our business.

<https://www.gpscgroup.com/en/sustainability/social/human-rights>

ANNEX

Likelihood and Severity Criteria

Likelihood Level	Description
Very unlikely (1)	Human right violation has never occurred in the company's business activity, but has happened to peers (never/unlikely to happen in 10 years). (<10%)
Unlikely (2)	Human rights violation has happened in the past and may continue to occur sometimes in a department (happened/may happened 1-4 times in 10 years) (>10% - <50%)
Likely (3)	Human right violation has happened in the past and may continue to occur frequently today (happened/may occur 5-8 times in 10 years) (>50%-<90%)
Very likely (4)	Human right violation has occurred in an ongoing manner until now (happened/may happened every year) (>90%)

	Severity level			
	Low	Medium	High	Critical
Scale	Minor impact to health and safety: first aid case	Slight impact to health and safety: minor injury or illness (no loss time)	Moderate impact to health and safety: serious injury that needs rehabilitation	Significant impact to health and safety: physical disability or fatality
Scope	No negative impact to stakeholder	Impact to some stakeholders in particular stakeholder groups	Impact to most stakeholders in particular stakeholder group	Impact to all stakeholders group
Remediation	Take less than a year to restore impact	Take 1-3 years to restore impact	Take 3-5 years to restore impact	Impossible to restore or will take longer than 5years to restore the impact