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Human Rights Risk and Impact Assessment Methodology

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## 1 INTRODUCTION

Human rights issues in business is one of the priorities keenly watched by investors, governmental sector, the public, private sector and media. Business itself assumes the role of human right support, accomplished by elevating quality of life via business activities, by further developing public utility to ensure the public access. Simultaneously, there are also possibilities of human rights violations occurring in business activities. This comprises an unsafe working environment, pollution infringing the rights of local communities, to name a few. Human rights violation may lead to negative impacts to overall business activities, such as cancellation of contracts, negative impacts on corporate image, as well as social backlash.

Soon after, the United Nations published a guideline on the subject, titled "United Nation Guiding Principles on Business and Human Rights: UNGP" to aid good human rights performance in business. The guideline is in accordance to the principles and framework of Protect, Respect, and Remediation. One of the key processes identified in the Guiding Principles on Business and Human Rights is comprehensive Human Rights Due Diligence (HRDD). This began from a declaration of corporate commitment to uphold human rights, via internal policies and regulations, Human Rights Risk Assessment (HRRRA) to study corporate human rights risks in business activities and enable for remediation if stakeholders' rights were violated by the company.

## 2 GOALS AND OBJECTIVES

Global Power Synergy Company Public Company (Limited) or GPSC Group (the company) recognizes the importance of upholding human rights in all business activities of GPSC Group, GPSC Group's value chains, and GPSC Group's new business relations .This was reflected clearly in corporate Human Rights Policy. In 2018, the company first launched comprehensive human right due diligence, based on human right risks assessment conducted in the same year. Human right risks and impact assessment (HRA) methodology is used as a tool for enabling companies to assess the company-associated human rights impacts to both internal and external stakeholders. In addition, this methodology allows the company and its subsidiary to identify and prioritize corporate human right risks, and, therefore, will help the company to effectively plan and manage these critical human rights risks through both existing and additional mitigation measures.

## 3 SCOPE

The methodology of human right risks and impact assessment applies to GPSC Group own operation, GPSC Group's contractors, tier 1 supplier, and joint ventures. The methodology mainly refers stipulation of related international agencies, such as United Nations Guiding Principles on Business and Human rights, International Finance Corporation (IFC) , and Danish Institution for Human Rights (DIHR).

## 4 DEFINITION OF HUMAN RIGHTS

Human rights are the basic freedom and protections that all people are entitled to. All human rights are underpinned by the following 4 principles (Guide to Human Rights Impact Assessment and Management: HRIAM) including:

- **Universal** All people are born with and are entitled to the same human rights, regardless of nationality, residence, gender, race, ethnicity, religion and cultural heritage.
- **Inalienable** Human rights should not be taken away or compromised except in specific situations and according to due process.
- **Indivisible** All human rights should be equally considered. Civil and political rights are of equal importance to economic, social and cultural rights.
- **Interdependent and interrelated** Human rights are mutually reinforcing. The enjoyment of one human right often relies wholly, or in part, on the existence of other human rights. Similarly, the interference of one human right often negatively affects other human rights.

Furthermore, there are other human rights stipulations and standards placed on the aforementioned criteria, such as International Bill of Rights. The Bill comprises of Universal Declaration of Human Rights (UDHR), International Covenant on Civil and Political Rights (ICCPR), and International Covenant on Economic, Social and Cultural Rights (ICESCR) as demonstrated in **BOX 4.1**

### BOX 4.1 Human Rights

Human rights are typically divided into 2 categories, civil and political rights and economic, social and cultural rights

- 1) **International Covenant on Civil and Political Rights (ICCPR)** Civil and political rights protect the individual from unwarranted infringement by government and private organisations and guarantee the individual the ability to participate in civil and political life without discrimination or repression. Examples of civil and political rights includes the: right to life, freedom of religion, freedom of speech, freedom of assembly, and rights to due process and a fair trial.
- 2) **International Covenant on Economic, Social and Cultural Rights (ICESCR)** Economic, social and cultural rights are found on the belief that people can enjoy rights, freedoms and economic justice all at the same time. Examples of economic, social and cultural rights includes the right to work, the right to just and favourable working conditions, the right to an adequate standard of living and the right to education.

## 5 ROLES AND RESPONSIBILITIES

Relevant personnel involved in the implementation of human right risk and impact assessment methodology comprises of the following:

## 5.1 OWNER

Sustainability and Climate Change Policy Department is the owner of this methodology. Their role is as follows.

- Developing the process of human right risk and impact assessment, and review the aforementioned methodology for future improvement, and
- Ensuring this methodology is effectively implemented by relevant corporate departments i.e. human rights impacts are identified and mitigated.

## 5.2 CUSTODIANS

Sustainability and Climate Change Policy Department is responsible in managing documents and leading human right risk and impact assessment methodology. This is because human rights is a component of sustainability management. Other departments involved with this methodology are those responsible for human capitals, community and government relations, supply chain; department on safety, security, occupational health and the environment; department on investment, analysis, planning and customer relationship. The roles are as follows.

- Identifying human right issues and severity of impacts related to respective departments
- Setting control measures and mitigate impacts specified
- Review human right risks assessment according to human right impact assessment annually
- Review and update relevant documents regularly

## 6 HUMAN RIGHT RISKS AND IMPACT ASSESSMENT PROCESS

The process of human right impact assessment is conducted systematically as shown in **Figure 6.1** Human Rights Risks and Impact Assessment Process.



Figure 6.1 Human Rights Risks and Impact Assessment Process

Source: IFC's Guide to Human Rights Impact Assessment and Management

## 6.1 PLANNING AND SCOPING

### 6.1.1 Scoping for HRIA

The first step of human right risks and impact assessment is to scope. Scoping enables executives to become aware of stakeholders likely to be impacted by the company's business activities. The findings reflect the scope of data collection and anticipated impacts. Such findings can be obtained from following methods:

- Review of peers' human right issues through primary source, such as publicly disclosed human rights performance, which may be disclosed through corporate website, sustainability report, and PTT Human Rights Management System Manual (Table 6.1).
- Review risks of human rights violation within the geography of operation.
- Review of human rights risks from publications by United Nations and non-profit organizations, such as Human Rights Watch, Amnesty International, Business for Social Responsibility Organization, Business & Human Rights Resource Center.

Table 6.1 Human Rights Issues for Human Rights Risk Assessment of Oil & Gas and Power & Utility Industrial sectors

| Labor Rights   | Community Rights   | Supply Chain  | Security and safety   | Environment   | Consumer Rights                                |
|--|--|---|---|---|--|
| - Freedom of Association and Collective Bargaining<br>- Forced and Compulsory Labor<br>- Child Labor<br>- Discrimination<br>- Harassment<br>- Human trafficking<br>- Equal remuneration,<br>- Other rights such as favorable working conditions<br>- Working hours | - Standards of Living and Quality of Life<br>- Community Health and Safety<br>- Community Engagement<br>- Cultural Heritage<br>- Minorities Including Indigenous Peoples<br>- Resettlement | - Supplier Engagement<br>- Supplier Code of Conduct | - Security Management<br>- Security Training<br>- Health and safety | - Water Security - Impact of Pollution<br>- Waste and Hazardous Materials Management<br>- Preservation of Biodiversity<br>- Broadening Access to Energy | - Consumer Health and Safety<br>- Data Privacy |

Source: Human Rights Management System (HRMS)

Business and human rights scholars association (BSR), '10 human rights priorities power and utilities-sector'

Furthermore, when it comes to scoping, the company must consider both human rights risks already occurred and those likely to occur throughout the entire value chain. This includes direct business activities by the company and indirect activities by suppliers, contractors, or trade partners; both of which may cause complicity in human rights violation. More information can be found in **Box 6.1**.

**BOX 6.1 Complicity in Human Rights Violation**

Human Rights Impact Assessment must consider complicity in human right violation, by considering the following:

- **Direct complicity:** This occurs when a business assists another organization or individual in perpetrating a human rights violation. For example, a company donates equipment to state security



forces when the company knows (or should have known) that the equipment could be used to violate human rights.

- **Beneficial complicity:** This occurs when a business directly benefits from a human rights abuse committed by another organization or individual. For example, state security forces may use disproportionate force in protecting a company's interest.
- **Silent Complicity:** This occurs when a company fails to challenge systematic human rights violations regardless of whether these violations are related to its business, such as discrimination against certain labor groups when it comes to employment.

Source: United Nations Global Compact

Once the data from the primary source has been reviewed, relevant human rights issues will be categorized to demonstrate the scope of assessment. Example of the company's scope in human rights assessment, categorized according to stakeholders in business value chain, is demonstrated in Figure 6.2



Figure 6.2 Example of the company's scope in human right risks and impacts assessment

Source: Human Rights Issues according to peers and other publications from governmental agencies or other reputable non-governmental agencies

## 6.2 DATA COLLECTION AND BASELINE DEVELOPMENT

Data collection and baseline development is a critical informative step to obtaining human rights risks issues, as confirmed by participants of human rights risks assessment process, who have direct association with these risks. This was according to the scope of issue initially studied in 6.1. Notably, participants of the assessment process may also propose additional risks issues beyond the established scope. Results following data collection and baseline development are as follows.

- Potential human rights risks and impacts associated with the company's activities.

- Identification of right holders or individuals affected from the risk issues associated to the company's activities, such as shareholders, investors, government agencies and institutions, employees, supplier and contractors, partners, customers, communities and society, and vulnerable groups, namely women, elderly, people with disability, children, indigenous people, migrant labor, third-party contracted labor, local communities, and other such LGBT and religious minority.
- Existing mitigation measures/controls the company uses to mitigate these risks.
- Identify salient issues that company must monitor and review, as well as issuing measures to reduce said risks. Further information on salient issues can be found at 6.3.2.

To obtain such information, the company must have data collection with responsible departments in business activities associated with risks identified in 4. The following methods may be used.

#### 6.2.1 CONDUCTING WORKSHOPS WITH REPRESENTATIVES FROM RESPONSIBLE DEPARTMENTS

The approach in conducting a workshop comprises grouping participants of assessment process according to the predefined topic identified in 6.2. The assessment scope is divided according to right holders or individuals affected by business activities throughout the company's value chain, such as employees, communities and environment, suppliers and contractors, and consumers.

1. Each group identifies all human risks associated with its function that may potentially occur and receptors for each risk. The Universal Declaration of Human Rights related to predefined topic (**Attachment 1**), right holders and potential impacts towards them. An example of human right risks from this process are presented in **Attachment 2**, Human Rights Risk Register Spreadsheet, GPSC's Detailed Assessment, titled Human Rights Issue and Description of Impact.
2. Each shares how predefined human right risks are being managed through existing measures and/or risks control by the company. Example of data from this process is presented in **Attachment 2**, Human Rights Risk Register Spreadsheet, GPSC's Detailed Assessment, titled Existing Human Rights Controls.
3. Each group convene to rank inherent and residual risks against pre-defined scoring criteria. Risk assessment criteria is presented in **6.3**.

#### 6.2.2 Data collection through human right risks register

The company may request for relevant information through the use of human right risk register (**Attachment 2**). Documents may be distributed to representatives of responsible departments, who will fill out the form and submit to Sustainability and Climate Change Policy Department as the Department is the central unit in data collection. Human right risk register comprises of data on human right risks and impact assessment

related to the company's business activities, prevention measures, or risk controls currently in place. This includes scoring of likelihood and severity of residual risks.

**6.3 RISK ASSESSMENT**

Severity assessment of impact adheres to human right risks assessment criteria (Figure 6.3). Risk scoring is according to the 2 primary dimensions of human right risk assessment, which are severity and likelihood, to identify the level of risk. There are 4 levels, which are extreme, high, medium and low. Further information regarding risk assessment criteria is available in 6.3.1.

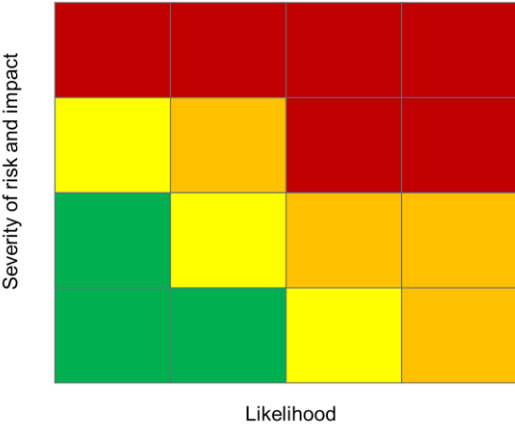
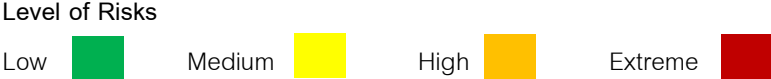


Figure 6.3 Human Rights Risk Assessment



**6.3.1 Human Right Risks Assessment Criteria**

Guiding principle on business and human rights identifies severity of issues as a component to observe when human right impact assessment is implemented. The details is presented in Box 6.3. Presently, the company has develop human right risks assessment criteria, which can be used in tandem with the scoring criteria outlined by guiding principle on business and human rights, as presented in Table 6.2

**BOX 6.3 HUMAN RIGHTS ASSESSMENT CRITERIA: SEVERITY**

- Scale How grave the impact is, for instance, impacts on the right to life or the health and safety of individual workers;
- Scope: How many people are or will be affected - for example, impacts on the livelihoods of entire communities or the freedom of association of an entire workforce;

- **Remediability:** Whether it will be difficult to restore the people impacted to a situation that is equivalent to their situation before the impact – for example where religious and cultural heritage of indigenous people has been destroyed.

Source: UN Guiding Principles on Business and Human Rights Article 14

#### Tale 6.2 Human Right Risks Assessment Criteria

| Criteria for Severity   |   |  |   |   |
|-------------------------|---|--|---|---|
|                         | Low (1)   | Medium (2)   | High (3)  | Critical (4)  |
| <b>Scale</b>            | 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 (loss time injury) | Significant impact to health and safety: physical disability or fatality                |
| <b>Scope</b>            | No negative impact to stakeholder                     | Impact to some stakeholders in particular stakeholder group                | Impact to most stakeholders in particular stakeholder group                                       | Impact to all stakeholders group (such as local communities, employees, and suppliers)  |
| <b>Remediability</b>    | Take less than a year (<1 year) to restore the impact | Take 1-3 years to restore the impact                                       | Take 3-5 years to restore the impact  | Impossible to restore or will take longer than 5 years (>5 years) to restore the impact |
| Criteria for Likelihood |   |  |   |   |
|                         | Very unlikely (1)                                     | Unlikely (2)   | Likely (3)  | Very likely (4)   |

|  |  |  |   |   |
|--|--|--|---|---|
|  | <p>Almost Never (&lt;10%)</p> <p>Human right violation has never occurred in the company's business activity, but has happened to peers (never/unlikely to happen in 10 years)</p> | <p>Unlikely (<math>\geq 10\%</math> - <math>\leq 50\%</math>)</p> <p>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)</p> | <p>Likely (<math>\geq 50\%</math> - <math>\leq 90\%</math>)</p> <p>Human right violation has happened in the past and may continue to occur frequently today (happened/may occur 5-8 times in 10 years)</p> | <p>Very likely (<math>\geq 90\%</math>)</p> <p>Human right violation has occurred in an ongoing manner until now (happened/may happened every year)</p> |
|--|--|--|---|---|

### 6.3.2 Human Rights Risk Assessment

For Human Rights Risks and Impact Assessment, there are two types of risk to consider:

- **Inherent risk**, which is the level of risk inherent, or natural, to the situation. It is based on the nature of the context when no mitigation measures are in place.
- **Residual risk**, which is the level of risk with all the measures and controls are in place.

The process to assess impact of identified human right risks is as follows.

1. Assess **inherent risk level** of identified human right risks using the risk criteria in Table 6.2, which assess the likelihood and the severity (scale, scope and remendability), and determine the significance of the risks prior to the company's implementation of control or mitigation measures.
2. Assess **residual risks level** by using the same assessment criteria with inherent risk level. However, in this step, the company needs to consider current mitigation measure and controls identified in 6.2. This helps assess the level of residual risk. Example of an assessment of inherent and residual risks is presented in **Figure 6.4**.

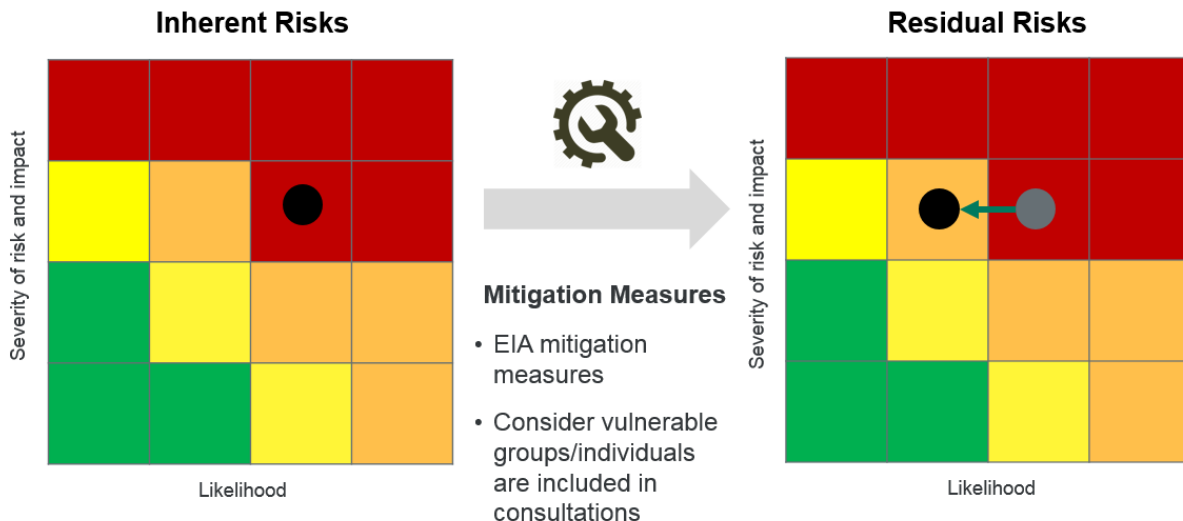


Figure 6.4 Example of an assessment of inherent and residual risks for the company's air pollution issue

3. Select the top **human rights salient issues** once all residual risks are finalized and placed in the matrix. The salient issues refer high priority risks that require further actions to appropriately mitigate the risks. In other words, those human rights risks are determined to have high level of impact, the company should therefore prioritize them. This can be achieved by reviewing existing risk management measure, as well as publishing additional measures to further mitigate risks. Example of salient issues is presented in 6.5.

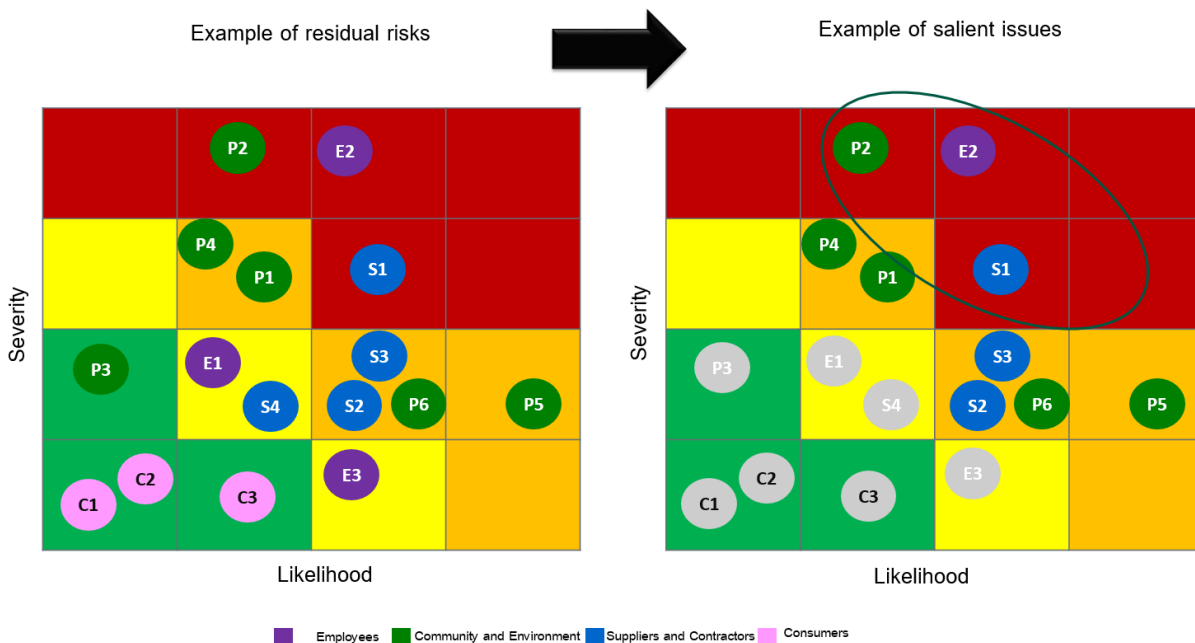






Figure 6.5 Ranking of residual risks or salient issues

### 6.3.3 Results of Human Rights Impacts Assessment

Results from human right risks and impacts assessment enable the company to be able to plan and manage aforementioned impacts. The company's actions depend on the level of risks. Further details are presented in Table 6.3

Table 6.3 Actions for Risk Mitigation

| Level of risk   | Actions   |
|---|---|
|  Low     | The company continues existing mitigation measures and regularly monitor business activities associated with the risks.                                 |
|  Medium  | The company should give attention and consistently monitor particular business activities identified as having medium risk level.                       |
|  High    | The company has to executive any mitigation measures immediately to lower the risk to an acceptable level.  |
|  Extreme | Extremely high level of risk to the point it is unacceptable. The company must terminate or stop the business activities causing the risks immediately. |

### 6.4 IMPACT MITIGATION AND MANAGEMENT

Once the impacts have been assessed, management measures will need to be identified, particularly for those with high and extreme level of risks. When these management measures have been implemented, the performance must be monitored and review to ensure continuous development for maximum efficiency. After impact management was put in place, the impacts should be re-assess to inform the company of residual impact. Considerations in establishing guidelines and measures in human right impact management are presented in Box 6.4.

#### BOX 6.4 Mitigation Hierarchy

- Any measures taken must be compatible with international human rights standards as well as a human rights-based approach
- Remediation should be explicitly included; this includes understanding and explaining that compensation and remediation are not synonymous, and that compensation should only be considered as a last resort; and,
- Human rights impacts cannot be subject to 'offsetting' in the same way that, for example, environmental impacts can be. For example, a carbon offset is a reduction in emissions of carbon dioxide made in order to compensate for or to offset an emission made elsewhere. With human rights impacts on the other hand, due to the fact that human rights are indivisible and interrelated, it is not considered appropriate to offset one human rights impact with a 'positive contribution' elsewhere.

For example, if business activities have caused an adverse impact on the right to health of workers due to inadequate personal protective equipment and health and safety procedures, these impacts cannot be offset by the business offering more jobs to local workers or scholarship to poor students.

**Source:** Human Rights Impact Assessment Guidance and Toolbox by Danish Institute for Human Rights

In the process of designing mitigation and management measures for human rights impacts, the company can exercise their 'leverage' with relevant departments involved with said human right risks. This influences their behaviors and lower the risks from business activities in which they are responsible for. **Table 6.4** demonstrate an example in which the company can create 'leverage.'

**Table 6.4** Examples of exercising and increasing leverage to address human rights impacts

| Examples of types of leverage            | Descriptions   | Examples of exercising leverage  |
|--|--|--|
| Traditional commercial leverage          | Leverage that sits within the activities the company routinely undertakes in commercial relationships, such as contracting.                                    | <ul style="list-style-type: none"> <li>• Include human rights standards in contracts</li> <li>• Audit for compliance with the human rights standards included in the contract</li> <li>• Include human rights in pre-qualification criteria in bidding processes; and/or</li> <li>• Provide commercial incentives for suppliers that are based on human rights consideration, e.g. targets for local content</li> </ul>  |
| Broader business leverage                | Leverage that a company can exercise on its own but through activities that are not routine or typical in commercial relationships, such as capacity building. | <ul style="list-style-type: none"> <li>• Build the capacity of suppliers to meet the responsibility to respect human rights</li> <li>• Ensure that procurement and purchasing staff send the same messages on human rights in their conversations with suppliers and decision-making about contracts; and/or</li> <li>• Use relevant international and industry standards to drive expectations by requiring supplier compliance with such standards.</li> </ul> |
| Leverage together with business partners | Leverage created through collective action with other companies in or beyond the same industry.  | <ul style="list-style-type: none"> <li>• Work with business peers to establish common requirements of suppliers; and/or</li> <li>• Engage bilaterally with peer companies who may be facing similar supply chain issues to share lessons learnt and to identify possible solutions.</li> </ul>   |



| Examples of types of leverage                     | Descriptions  | Examples of exercising leverage   |
|---|---|---|
| Leverage through bilateral engagement             | Leverage generated through engaging bilaterally and separately with one or more other actors, such as: government; business peers; an international organization; or a CSO. | <ul style="list-style-type: none"> <li>Engage CSOs and relevant international organizations who can provide relevant information on local actors or circumstances in supplier countries; and/or</li> <li>Engage with a range of actors bilaterally to identify and implement solutions to specific human rights supply chain issues that have been identified.</li> </ul> |
| Leverage through multi-stakeholder collaboration: | Leverage generated through collaborative action – collectively with business peers, governments, international organizations and/or NGOs or CSOs.                           | <ul style="list-style-type: none"> <li>Develop shared standards for suppliers through multi-stakeholder initiatives, thereby enhancing the credibility of the standards; and/or</li> <li>Use the business’s brand and reputation to convene relevant stakeholders to address any systemic issues that have been identified</li> </ul>                                     |

Source: Human Rights Impact Assessment Guidance and Toolbox by Danish Institute for Human Rights

Box 6.4 provides a list of example management measures that have been successfully used within the exploration and production sector. Once the management measures have been identified, the impacts should be re-assessed for identification of residual impact.

**BOX 6.4 Management Measures**

The company has established an operating methodology that guide day-to-day management of an asset. This will form an integral part of the overall management system. Examples of management measures commonly employed include:

- Establishment of a memorandum of understanding with the local police or security force. An MOU helps set out the expectations in instances where the local police or security force becomes involved in managing a protest or other form of community at an asset. This will help reduce the company’s potential in becoming complicit in the human rights violations;
- Preparation of a chance find methodology. This type of methodology can help minimise the potential impacts on cultural heritage values during construction and operation of an asset;
- Development of a code of conduct and training for staff, including contractors. This will help to ensure that all staff of aware of their obligations when interacting with local community members as well as aware of their rights as workers;
- Establishment of a rigours procurement process that includes ongoing monitoring. This will help minimise the potential for GPSC to be complicit in a human rights violation.

## 6.5 REPORTING AND EVALUATION

### 6.5.1 Reporting of Assessment Results

The company will consolidate results from human right risk and impact assessment in a human rights risk register, to inform executives of the situation and future action plans. **(Attachment 2)** any important changes associated to human rights issues for development of new business units, or to add on into existing projects. Sustainability and Climate Change Policy Department will report to the executives for consideration or improvement of overall human right risks within human right risk register.

### 6.5.2 Monitoring and assessment

Guiding principle on business and human right risks has clearly identified that human right risks and impact assessment needs to be implemented continuously with regular reviews. Human rights risks issues associated to the company's business activities may change, according to the changing activities and stakeholder groups. Notably, performance monitoring and assessment is another crucial process. Establishing the indicators enables performance monitoring and assessment, as well as demonstrate effectiveness of the process, and promoting continuous process improvement. Presently, PTT Group has established a set of human rights indicators for monitoring and assessment of risks generated by associated business activities. The details are presented in Table 6.5.

Table 6.5 Example of PTT's Human Rights Indicators

| Human rights issues | Example of Human rights indicators   |
|---------------------|--|
| Labor Rights        | <ul style="list-style-type: none"> <li>• Percentage of employees that are trained on issues of human rights</li> <li>• Percentage of female employees in senior executive level</li> <li>• Number of grievances or lawsuits related to human rights violation by the conduct of corporate. The incidents may not be expected or operation mismanagement from laws or regulation on human rights (number events on discrimination)</li> <li>• Employees turnover rate caused by the violation of human rights , such as; employees resigning due to working unsafety or unhealthy conditions</li> </ul> |
| Community Rights    | <ul style="list-style-type: none"> <li>• Percentage of operation or areas of operation that are assessed on human rights risks and those risks are recognized under the risk management plan</li> </ul>  |

| Human rights issues | Example of Human rights indicators  |
|---------------------|---|
|                     | <ul style="list-style-type: none"> <li>• Number of grievances that the company receives and resolved, such as; number of involuntary resettlements, number of cases of indigenous rights violations, and etc.</li> <li>• Number of recurrent cases of the same incidents caused by human rights violation, such as; violation of indigenous rights</li> </ul>   |
| Supply Chain        | <ul style="list-style-type: none"> <li>• Percentage of institutions and business units that conduct risk assessment in their supply chain (Environment, social, governance, and human rights)</li> <li>• Percentage of suppliers that acknowledge the company's sustainable supplier code of conduct</li> <li>• Percentage of suppliers that receive training on human rights</li> <li>• Number of suppliers whose operations are assessed on human rights performance</li> <li>• Number of disruptions or severe accidents cause by mismanagement of supply chain</li> </ul>   |
| Safety and Security | <ul style="list-style-type: none"> <li>• Percentage of operation or areas of operation that are assessed on safety and security risks</li> <li>• Percentage of operation or areas of operation that are assessed on safety and security risks and those risks are recognized under the risk management plan</li> <li>• Percentage of subcontractor security staffs that are trained on human rights</li> <li>• Number of grievances or lawsuits related to human rights violation by the conduct of corporate. The incidents may not be expected or operation mismanagement from laws or regulation on human rights (number human rights violations incidents that occur with subcontractor security staffs.)</li> </ul>  |
| Environment         | <p><b>Water Management</b></p> <ul style="list-style-type: none"> <li>• Number of projects that are results of participations of society and community on water management</li> <li>• Number of disputes or conflicts with stakeholders on water management</li> </ul> <p><b>Impact of Pollution, Waste Management and Hazardous Materials Management</b></p> <ul style="list-style-type: none"> <li>• Environmentally controlled indicators that are not aligned with regulations, such as; VOCs, Sox and NOx</li> <li>• Environmentally controlled indicators that have been improved.</li> <li>• Number of grievances due to the company's operations caused by non-compliance on SSHE (including waste and hazardous substances management)</li> <li>• Number of lawsuits due to the company's operations caused by non-compliance on SSHE</li> </ul> |

| Human rights issues | Example of Human rights indicators  |
|---------------------|---|
|                     | <ul style="list-style-type: none"> <li>• Fines or penalty that is due to non-compliance of operation on SSHE</li> </ul>   |
|                     | <p><b>Preservation of Biodiversity</b></p> <ul style="list-style-type: none"> <li>• Percentage of areas of operations that risk assessment on biodiversity is conducted.</li> <li>• Number of activities and areas of operations having biodiversity risks that have risks mitigation plan</li> <li>• Number of development projects or research programs to support in activities that promote biodiversity</li> <li>• Increasing or decreasing rate of target/ threaten, key species</li> </ul> |
| Customer Rights     | <ul style="list-style-type: none"> <li>• Number of recurrent complaints on company products and services due to the same causes</li> <li>• Number of violations on laws and regulations on product labelling or standards on health, safety, security, social, and environment throughout product life cycle. This includes number of incidents that violate consumer rights.</li> <li>• Percentage of incomplete cases of providing information required by law to customers.</li> </ul>         |

Source: PTT Human Rights Management System (HRMS)

## 7 REFERENCES

Table 7.1 describes information sources for the development of HRIA methodology and supported data (as normative references of human rights risks and impact assessment). Sustainability and Climate Change Policy Department should be aware of human rights issues, situations, standards and law and regulation which could affect to human rights risk in business activities and impact on relevant stakeholders.

Table 7.1 Normative Reference

| Normative Reference                | Hyperlink   | Description   |
|------------------------------------|---|---|
| International Bill of Human Rights | <a href="http://www.ohchr.org/Documents/Publications/Compilation1.1en.pdf">http://www.ohchr.org/Documents/Publications/Compilation1.1en.pdf</a> | International Bill of Human Rights consists of: <ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights 1948 as the fundamental human rights framework</li> <li>• International Covenant on Civil and Political Rights 1966</li> </ul> |

| Normative Reference                          | Hyperlink  | Description  |
|--|--|--|
|  |  | <p>states to Civil and Political Rights such as the right to life, the right to freedom of thought, conscience and religion, the right to freedom of association, etc.</p> <ul style="list-style-type: none"> <li>• International Covenant on Economic, Social and Cultural Rights (ICESCR) 1966 aims to ensure the protection of economic, social and cultural rights; such as, the equal right of men and women, the right to work, the right to an adequate standard of living, etc.</li> </ul>   |
| <p>International Labor Organization: ILO</p> | <p><a href="http://www.ilo.org/declaration/lang--en/index.htm">http://www.ilo.org/declaration/lang--en/index.htm</a></p> | <p>International Labor Organization (ILO) aims to promote rights at work, encourage decent employment opportunities, enhance social protection and strengthen dialogue on work-related issues.</p> <p>The ILO Declaration on Fundamental Principles and Rights at Work consists of principles and rights in four categories, whether or not they have ratified the relevant Conventions:</p> <ul style="list-style-type: none"> <li>• Freedom of association and the effective recognition of the right to collective bargaining;</li> <li>• The elimination of forced or compulsory labor;</li> </ul> |

| Normative Reference                     | Hyperlink   | Description  |
|---|---|--|
|   |   | <ul style="list-style-type: none"> <li>• The abolition of child labor; and</li> <li>• The elimination of discrimination in respect of employment and occupation</li> </ul>   |
| Business & Human Rights Resource Center | <a href="http://business-humanrights.org/en/regions-countries">http://business-humanrights.org/en/regions-countries</a>   | <p>Business &amp; Human Rights Resource Center is the knowledge hub that tracks human rights policy and performance of various global industries. However, the Business &amp; Human Rights Resource Center still lacks overview of crucial human rights issues in each country.</p> <p>Business &amp; Human Rights Resource Center commits to represent fairly all sides of debates on business and human rights issues, including highlighting good practice as well as criticisms of companies' impacts which are advocated by civil society organizations, media agencies, companies and governments.</p> |
|   | <a href="http://business-humanrights.org/en/sectors">http://business-humanrights.org/en/sectors</a>   | <p>Business &amp; Human Rights Resource Center presents case studies and human rights data which are link to various business sectors.</p>   |
| International Finance Corporation (IFC) | <a href="http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/guide+to+human+rights+impact+assessment+and+management/guide+to+hr+iam/to">http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/guide+to+human+rights+impact+assessment+and+management/guide+to+hr+iam/to</a> | <p>International Finance Corporation (IFC) provides a principle-based framework, best practices, resources and networking events related to human rights. IFC presents a linkage among human</p>   |

| Normative Reference                                      | Hyperlink   | Description  |
|--|---|--|
|  | ols+and+tables/hriam+table/hriam++table   | rights with business risks, impacts and opportunities; which can be used as a human rights identification manual in individual level in operating areas.   |
| Danish Institute for Human Rights                        | <a href="https://www.humanrights.dk/business/tools/human-rights-impact-assessment-guidance-and-toolbox">https://www.humanrights.dk/business/tools/human-rights-impact-assessment-guidance-and-toolbox</a> | <p>Human Rights Impact Assessment Guidance and Toolbox illustrates approach for human rights risk and impact identification and mitigation measures to respond those identified risks and impacts. The Human Rights Impact Assessment Guidance and Toolbox by Danish Institute for Human Rights is internationally recognized tool for human rights impact assessment, which consists of following steps:</p> <ul style="list-style-type: none"> <li>• Planning and scoping;</li> <li>• Baseline data collection;</li> <li>• Impact assessment;</li> <li>• Mitigation and management; and,</li> <li>• Reporting and evaluation.</li> </ul> |
| Office of the High Commissioner for Human Rights (OHCHR) | <a href="http://www.ohchr.org/EN/Countries/Pages/HumanRightsintheWorld.aspx">http://www.ohchr.org/EN/Countries/Pages/HumanRightsintheWorld.aspx</a>   | Office of the High Commissioner for Human Rights (OHCHR) represents the world's commitment to universal ideals of human dignity. Human rights reporting, such as concluding observations, are provided specific recommendations of human rights to country members of United Nation (UN).  |
| World Report by Human Rights Watch                       | <a href="https://www.hrw.org">https://www.hrw.org</a>   | Human Rights Watch is a non-profit/ non-governmental human   |

| Normative Reference | Hyperlink | Description  |
|---------------------|-----------|--|
|                     |           | rights organization which is known for its accurate fact-finding, impartial reporting, effective use of media, and targeted advocacy, often in partnership with local human rights groups. The organization has published the World Report which is assessed the human rights risks and impacts in a country worldwide. The Report aims to promote civil and political rights rather than social, economic and cultural risks. |

8 ATTACHMENTS

Attachment 1 Supporting documents from GPSC comprehensive human rights due diligence

Attachment 2 Human Rights Risk Register