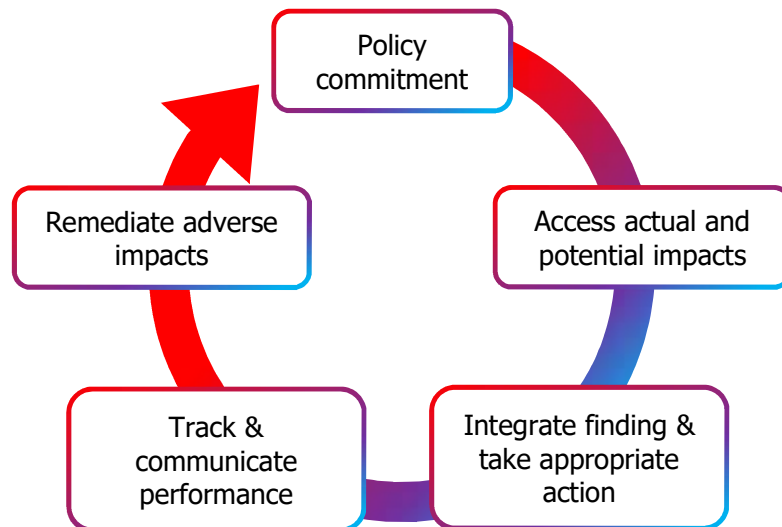# Human Rights
Due Diligence Report

Human Rights

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

Human Rights Due Diligence Process

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

Reference: UN Guiding Principles on Business and Human Rights

1. Policy commitment

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

True is committed to preventing all forms of illegal labor practices (such as human trafficking, child labor, forced labor), discrimination, and harassment. Additionally, True is dedicated to respecting and promoting equal remuneration, diversity, freedom of association, the right to collective bargaining, and the respect of other rights, including employee health and safety, working conditions, community health and safety, standard of living, cybersecurity, and data privacy of stakeholders.

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

## 2. Assess actual and potential impacts

True has assigned a third-party consulting company to evaluate Human Rights due diligence and risk assessment processes covering 100% of our own operations and relevant stakeholders throughout the value chains, including vulnerable groups that are at risk of being impacted by our operations.

Human Rights Risk Assessment

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

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

Scope of True Human Rights Risks Assessment: True Value Chain
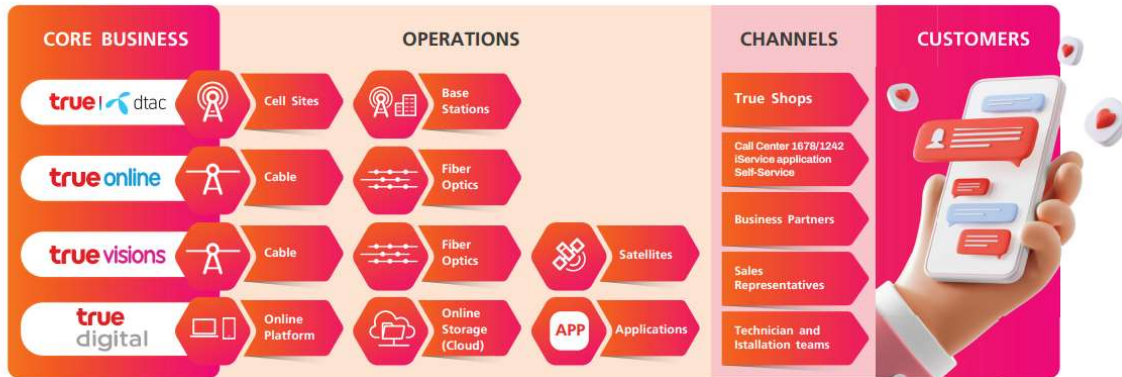
Methodology

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

1. **Identification of Human Rights Issues**:

    a. Identifying all relevant human rights issues related to True's business activities in the value chain.

    b. Identifying affected rights holders (e.g. employees, communities, customers) and vulnerable groups (i.e. women, pregnant women, children, indigenous people, migrant labor, third-party contracted labor, local community, LGBTQI+, and elderly)

Through screening of human rights issues that are relevant to True's business activities and value chain, we reviewed peer benchmarking of similar industries/sectors and various international benchmarking resources. The scope of relevant human rights issues for True's in 2023/2024, as shown below:

Employees Rights	Community Rights	Customers Rights	Suppliers Rights
• Discrimination/Harassment • Data privacy (employee/customer/partner) • Freedom of association • Freedom of expression • Illegal forms of labour • Working conditions • Occupational health and safety	• Land Acquisition • Community Health and Safety • Community Standard of Living • Safety Content	• Customer data privacy • Misleading Marketing • Discrimination • Customer Health and Safety • Network Outage/Service Quality • Access to Connectivity • Unintended Subscription to Additional Services • Online & Call-Center Scams & Frauds	• Health and safety • Working conditions • Supplier data privacy • Freedom of association and assembly • Discrimination / Harassment • Illegal forms of labour

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

   a. Inherent Risk Rating: are human rights risks that did not take into consideration any existing measures or controls True's may have.

   b. Residual Risk Rating: are human right risks after considering the existing measures and controls. High residual risks are considered human rights salient issues, in which require implementation of additional measures.

Human Rights Risks Assessment Matrix

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

Severity \ Likelihood	Rare	Unlikely	Possible	Likely	Almost Certain
Critical	High	High	High	High	High
Serious	Medium	Medium	Medium	High	High
Moderate	Low	Low	Medium	Medium	Medium
Minor	Insignificant	Low	Low	Low	Low
Insignificant	Insignificant	Insignificant	Insignificant	Low	Low

Likelihood

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

Risk Rating Definition

Level	Description	Management's Action
High	The loss, injury, damage, disadvantage, or anything that has a **severe effect** on organizational objectives, operations, reputation, assets or individuals.	Requires management's **high-priority attention and remedy and need Board's approval.**
Medium	The loss, injury, damage, disadvantage, or anything that has a **moderate effect** on organizational objectives, operations, reputation, assets or individuals.	Requires management's **attention and keep Board informed.**
Low	The loss, injury, damage, disadvantage, or anything that has a **minimal effect** on organizational objectives, operations, reputation, assets or individuals.	Requires management's **attention and continuous monitoring**.
Insignificant	The loss, injury, damage, disadvantage, or anything that has **no important effect** on organizational objectives, operations, reputation, assets or individuals.	Requires management's **continuous monitoring**.

Determining Severity (Y-Axis)

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

Determining Likelihood (X-Axis)

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

3. Integrate finding and take appropriate action

Results of Human Rights Risk Assessment

Severity \ Likelihood	Rare	Unlikely	Possible	Likely	Almost Certain
Critical	High	High	High	High	High
Serious	Medium	Medium	Medium	①High	②High
Moderate	Low	Low	Medium	Medium	Medium
Minor	Insignificant	Low	Low	Low	Low
Insignificant	Insignificant	Insignificant	Insignificant	Low	Low

Likelihood

Human Rights Salient Issues in True
- Supplier health and safety
- Data Privacy (Abuse of Customers' Personal Information)
(More information in True Sustainability Report 2024, Page 40-41)

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

100%	of own operation sites were assessed (63 Operation Sites)
12.7%	of activities (8 Sites) in own value chain operation sites with human rights risk
100%	of all high risk activities with mitigation plan and remediation process implement

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

100%	of total Tier 1 supplier with were assessed (1,521 Tier 1 in 98 product categories)
1.84%	of Tier 1 supplier (28 Sites) was found to be at human rights risk.
100%	of Tier 1 supplier with human rights risks and with mitigation plan and remediation process implemented

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

100%	of Joint ventures portfolios were assessed (5 number of investment portfolios)
0%	of Joint ventures portfolios with human rights risk
100%	of all high risk activities with mitigation plan and remediation process implemented

Mitigation Measures

SALIENT ISSUE	IMPACTED ENTITY	MITIGATION	PERFORMANCE RESULTS
Suppliers Health and Safety	• Suppliers	• Enforce Business Partner Code of Conduct and audit compliance through partner assessment processes by the company and internationally certified standards organizations. • Train subcontractors and training instructors on basic safety procedures, emphasizing safety processes before commencing work such as safety requirements in service contracts (Prequalification), hazard awareness and control (JSA), safe work at heights, electrical safety training for workers involved in electrical systems, and Lockout/Tagout procedures. • Implement jointly planned safety plans, emphasizing top management involvement from each department and frontline staff, dividing practices to achieve goals in four areas: 1) Leadership commitment and safety responsibility, 2) Organizational development and skills, 3) Ethical conduct and safety management systems, 4) Safety reporting and communication. • Conduct random safety inspections at actual operational sites regarding compliance with safety requirements and the company's safe work procedures, especially in high-risk tasks such as Broadband services.	• In 2024, 0 case fatalities from Subcontractor compared to 1 case in 2023. • 100% reported and investigated severe incidents promptly, identifying causes and prevention measures. • 100% of Significant Tier 1 suppliers ESG assessments under BPM and DJSI frameworks resulted in measures to prevent and reduce impacts next year.
Data Privacy (Abuse of Customers' Personal Information)	• Customers	• Ensure that the scope of consent forms is well-defined, service-specific, and is aimed at providing benefits to customers, not only benefits to business. • Ensure compliance with all applicable laws and regulations on personal data protection, cybersecurity, telecommunications services, computer crimes, debt collection, and other topics. • Provide training, with regular refresher courses, on data privacy, cybersecurity, and ethical use of customer data for all relevant personnel. • Cybersecurity measures: Set up and continually improve the Security Operation Center (SOC), certified in accordance with ISO/IEC 27001:2013. • Secure data protection for sensitive/personal data at both in-transit and at-rest data by having access control, authentication mechanism and encryption of data. • Quick response protocol to address potential cases • Provide Hotline/Grievance • Allocate sufficient resources for data breach monitoring.	• All consent forms are reviewed and revised if necessary. • Full compliance with all applicable laws and regulations. • Coverage of training on Data Privacy and Cyber Security (98% of all relevant personnel) • 100% of breaches are managed • Reduce number of data breach (10% non-cyber) • 100% of internal data usages are subject to privacy check point • 100% of personal data requests by law enforcement or national security agencies (Authority Requests) are subjected to human rights assessment.

4.   Track and communicate performance

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

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

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

- Email Address : auditcommittee@truecorp.co.th;
- Company Website: https://truesustainability.info/sustainability/en/

5. Remediate adverse impacts

True organized a workshop on the Human Rights Due Diligence Process 2023/2024, which is regularly every two years. In addition, the Company conducts an annual review of human rights risk issues with preparing risk prevention and mitigation measures, providing reasonable remedies (both finance and non finance). With the collaboration of all departments within True and our joint ventures, and representatives of suppliers and contractors, the review covered 100% of True's operations and value chain.

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

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

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