



PTG Group

**Process of Identifying
Human Rights Risks**

Human Rights Due Diligence



1. The declaration of a policy regarding the respect for human rights



Human Rights Policy

PTG Group



PTG ENERGY GROUP

Supporting Document

on

Human Rights Policy

Records of Revisions

| No. of revision | Effective Date | Detail of Revision |
|-----------------|----------------|---|
| 08 | 01/01/2024 | 2023 Annual review |
| 07 | 23/12/2022 | Specify more about participation in the negotiation of employee benefits. |
| 06 | 11/11/2021 | Added Rights of Partners and Corrective Measures |
| 05 | 13/05/2021 | Revised the entire document |
| 04 | 01/01/2021 | 2020 Annual review |
| 03 | 01/01/2020 | 2019 Annual review |
| 02 | 01/01/2019 | 2018 Annual review |
| 01 | 01/01/2018 | 2017 Annual review |
| 00 | 23/12/2016 | First implementation |

- PTG is dedicated to conducting business with responsibility, adhering to transparent and accountable business principles, with ethical practices, respect for human rights, and emphasizing equality for all stakeholders.
- The human rights policy of PTG Group aligns with international agreements on human rights, including the United Nations Universal Declaration of Human Rights and the principles addressing business and human rights of the United Nations.
- Encompassing the rights of employees, business partners, customers, as well as community and environmental rights, and specifying appropriate mitigation measures.
- Disclosed on the PTG Energy company website: [Human Rights Policy](#).

Universal Declaration on Human Rights 35 Articles

- 1) Right to life
- 2) Right to freedom and security
- 3) No slavery and forced labor
- 4) No torture and inhuman treatment
- 5) Same right to use law
- 6) Equal before the law
- 7) Right to freedom from war and racial and religious hatred
- 8) Right to access effective remedies
- 9) Right to treated fair by court
- 10) Right to be free from retroactive criminal law
- 11) Right to privacy
- 12) Freedom to movement and residence
- 13) Right to asylum
- 14) Right to nationality
- 15) Child protection rights
- 16) Rights to marry and have family
- 17) Right to own things
- 18) Freedom of thought and religion
- 19) Freedom of opinion and expression
- 20) Right to assemble
- 21) Freedom of association
- 22) Right to participate in public life
- 23) Right of social service
- 24) Right to work
- 25) Right to receive fair and satisfactory working conditions
- 26) Right to join forces to protect working interests
- 27) Right to a good livelihood
- 28) Right to health
- 29) Right to education
- 30) Right to participate in cultural life
- 31) Right to freedom to determine one's own way of life and the use of natural resources
- 32) Right of detainees to be treated humanely
- 33) Right not to be imprisoned if the contract is not fulfilled
- 34) Aliens' rights to due process if expelled
- 35) Minority rights

Refer to:

- Universal Declaration on Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights

2. Plan and Scope



| # | Human rights issues | Persons who may be infringed | Business activities along PTG's value chain | | | | |
|----|---|---|---|---------|----------|---------------------|-----------|
| | | | Supply | Storage | Shipping | Marketing and Sales | Supporter |
| 1. | Discrimination | Suppliers/Contractors/ Customers/Employees | ✓ | | | ✓ | ✓ |
| 2. | Health and Safety | Community/Environment/ Customers/Employees | | ✓ | ✓ | ✓ | ✓ |
| 3. | Standard of living and quality of life of the community | Community/Environment | | ✓ | ✓ | ✓ | |
| 4. | Access to water and sanitation | Community/Environment | | ✓ | ✓ | | |
| 5. | Acquisition of land | Community/Environment | | ✓ | | ✓ | |
| 6. | Data Privacy | Customers/Employees | | | | ✓ | ✓ |
| 7. | Employment conditions | Employees | | | | | ✓ |
| 8. | Freedom of association and negotiate | Employees | | | | | ✓ |
| 9. | Illegal employment (child labor, forced labor, and foreign workers) | Child | | | | | ✓ |

2. Plan and Scope



Scope of issues in risk assessment and human rights impacts of the company

Business scope of human rights risk assessment

1. Oil Business

- PTG Energy Public Co., Ltd.
- Petroleum Thai Corporation Co., Ltd.
- PTG Logistics Co., Ltd.
- BPTG Co., Ltd.

2. Non-oil Business

- Atlas Energy Co., Ltd.
- Olympus Oil Co., Ltd.
- GFA Corporation (Thailand) Co., Ltd.
- Siam Autobags Co., Ltd.
- Max Card Co., Ltd.
- Max Solution Service Co., Ltd.

| Employee Rights | Community and Environmental Rights | Supplier and Contractor Rights | Customer Rights |
|--|---|---|---|
| <ul style="list-style-type: none"> • Discrimination • Health and Safety • Data Privacy • Working Condition • Freedom of Association and Collective Bargaining • Illegal form of Labor (child labor, forced labor, and migrant labor) | <ul style="list-style-type: none"> • Health and Safety • Community Standard of Living • Community Access to water and sanitation • Land Acquisition | <ul style="list-style-type: none"> • Discrimination • Health and Safety | <ul style="list-style-type: none"> • Discrimination • Health and Safety • Data Privacy |



PTG ENERGY

บริษัท พีทีจี เอ็นเนอยี จำกัด (มหาชน)



**ATLAS ENERGY
COMPANY LIMITED**



3. Human Rights Risk Assessment



1. Screening Human Rights issues

- Compare cases of human rights violations that occur within companies in the same industry group.
- Developing a human rights risk register by specifying human rights issues aligned with the company's business activities in accordance with the value chain.

2. Voting for Inherent Risk

- The related business units collaborate to assess risks arising from natural occurrences (pre-existing risk before mitigation measures).

3. Voting for Residual Risk

- The related business units jointly assess the risks after the implementation of the mitigation measures.
- If human rights issues still pose a high risk, the company must implement additional measures to mitigate the impact.

3. Human Rights Risk Assessment



Risk rating scale: Likelihood

| criteria \ Likelihood | Very Low (1) | Low (2) | Medium (3) | High (4) | Very High (5) |
|-----------------------|--|--|--|--|---|
| Probability | The probability of this occurring is less than 10% | There is a possibility of this occurring from 10-20% | There is a possibility of this occurring from 21-50% | There is a possibility of this occurring from 51-80% | There is a possibility of this occurring from 81-100% |
| Duration | unlikely to happen within this year | Occurs within 12 months | Occurs within 6 months | Occurs within 3 months | Occurs every month |
| Frequency | Occurs 1 time/year | Occurs 2-3 time/year | Occurs 4-6 time/year | Occurs 1 time/month | Occurs more than 1 time/month |

Risk rating scale: Impact

| Criteria | Very Low (1) | Low (2) | Medium (3) | High (4) | Very High (5) |
|---------------------|--|---|---|---|--|
| Scale | It does not affect the health, hygiene, and safety of employees or stakeholders (Basic first aid) | The stakeholder was injured and required medical attention. | The stakeholder was seriously injured and had to <u>stop working for more than 3 days</u> . | The stakeholders are disabled. | Stakeholder died. |
| Scope | It does not affect relevant stakeholders. | It has some impacts on only <u>1 group</u> of stakeholders. | It has largely impacts on only <u>1 group</u> of stakeholders. | It has an impact on <u>more than 1 group</u> of stakeholders involved. | It has a <u>broad impact</u> on stakeholders or <u>beyond the scope of the operational area</u> . |
| Irremediable | Able to control or mitigate impacts on human rights to return to normal in a period of not more than 3 months. | Able to provide compensation to relevant stakeholders to return to normal in <u>more than 3 months but not more than 1 year</u> . | Able to control or mitigate impacts on human rights to return to normal <u>within 1-3 years</u> . | Able to control or mitigate impacts on human rights to return to normal <u>within 3-5 years</u> . | Unable to control or mitigate human rights impacts to return to normal and/or take time to remedy <u>more than 5 years</u> . |

3. Human Rights Risk Assessment

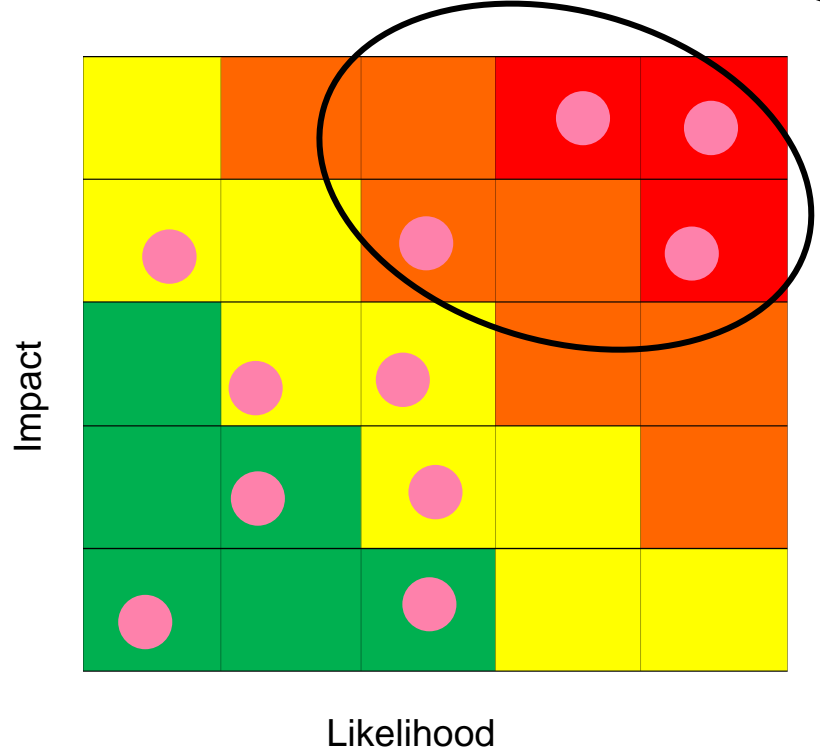


Final Output

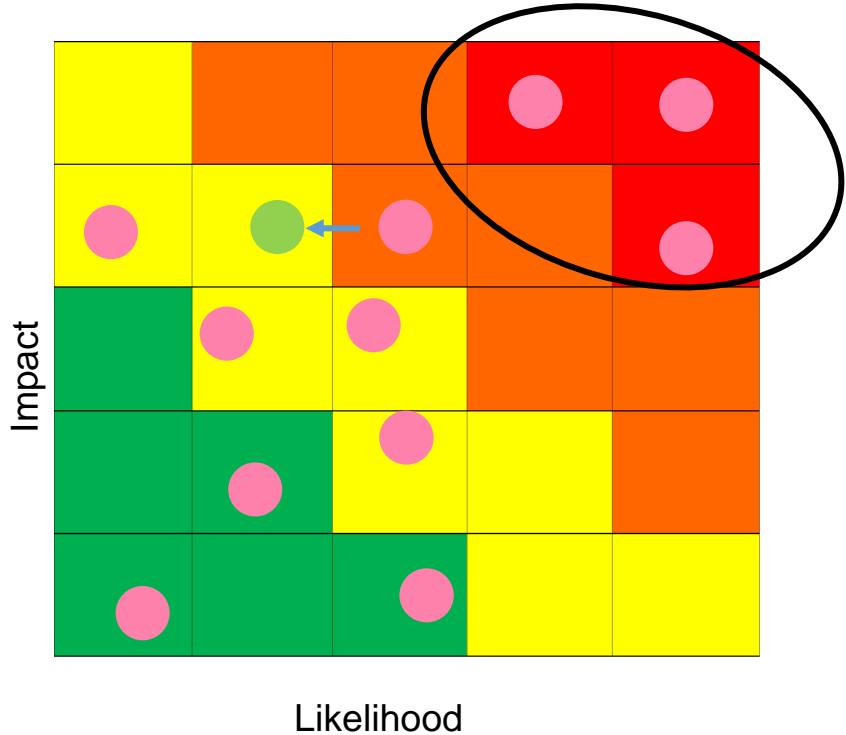
1 Screening

- 1. **Discrimination** ✓
- 2. **Health and Safety** ✓
- 3. **Standard of Living and Quality of Life of The Community** ✓
- 4. **Access to Water and Sanitation** ✓
- 5. **Acquisition of Land** ✓
- 6. **Data Privacy** ✓
- 7. **Employment Conditions** ✓
- 8. **Freedom of Association and Negotiate** ✓
- 9. **Illegal Employment** ✓

2 Inherent Risks



3 Residual Risks + Mitigation plan



4. Human Rights Discrimination and Violation Whistleblowing



Mobile application
PT Max Reward



Call center 1614

E-mail

Whistleblower@pt.co.th

Company Website

www.investor.ptgenergy.co.th

[Invertors Relations > Complaints and Anonymous
Tips > Whistleblowing and Complaint procedures]

PTG Portal : COMPLAINT

The screenshot shows a web form titled "แจ้งเรื่องร้องเรียน COMPLAINT". It contains several input fields: "แจ้งชื่อคุณ" (Your Name), "ชื่อ-นามสกุล" (Name-Surname) with a dropdown menu, "เบอร์โทร" (Phone Number), "อีเมล" (Email) with a dropdown menu showing "natvritta.sag@pt.co.th", and a large text area for "รายละเอียดการร้องเรียน" (Complaint Details). A green "แจ้งเรื่องร้องเรียน" (Report Complaint) button is at the bottom.

Providing protection for whistleblowers or complaints

PTG will collect information that is notified by the information provider or whistleblowers are kept in the highest secrecy. All involved persons who provide information or evidence that is true will be protected from having their careers affected by the perpetrators.

