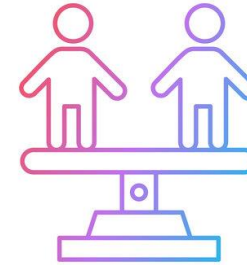




VGI



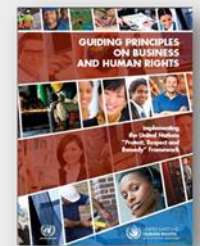
Human Rights Due Diligence Disclosure Report (2021/22)

VGI Human Rights Due Diligence Process

All individuals are ethically and equally entitled to human rights. Thus, VGI Public Company Limited (“VGI”) is aware of the importance of operating its business by protecting the human rights of stakeholders in the value chain as violation could have potential impacts on the Company’s business operation and reputation. Therefore, VGI has conducted a Human Rights Due Diligence process (HRDD) in 2021/22, and will continue to systematically conduct and review the process every 3 years. The process was implemented in accordance with international standards, including UN Guiding Principles on Business and Human Rights.

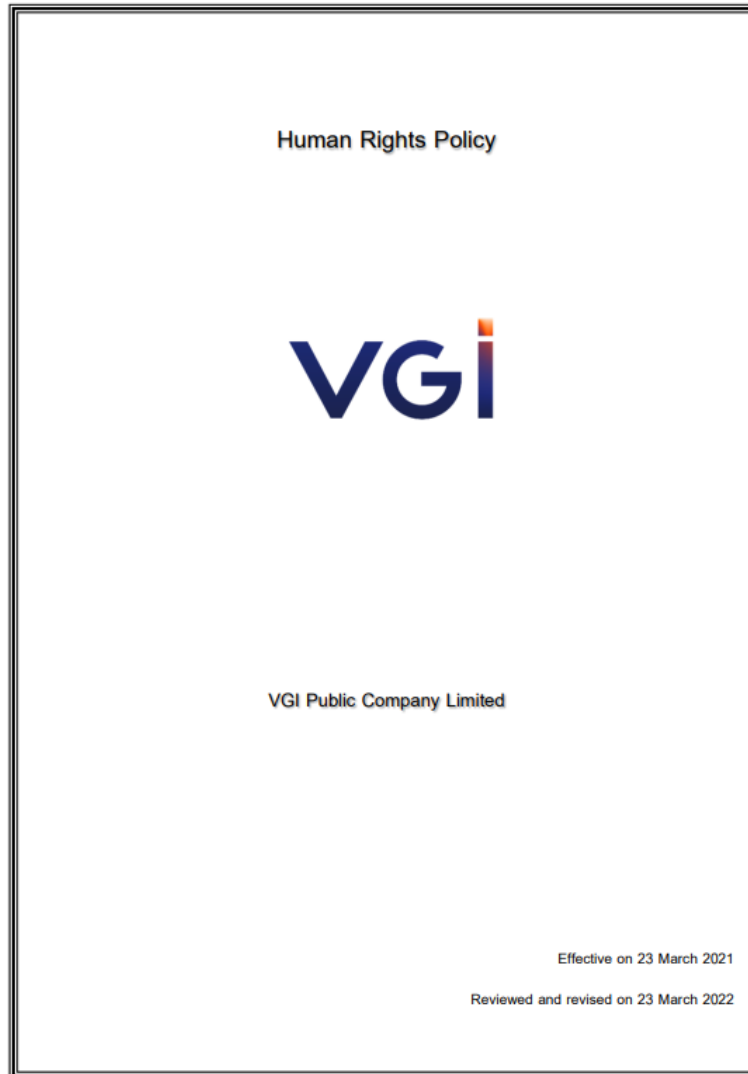
The HRDD assessed actual and potential human rights issues associated with VGI’s own business operations that the Company has management control over, throughout the entire value chain, and to subsequently establish preventive and corrective measures to remediate potential adverse impacts.

The process follows 5 main stages, as outlined below:



Reference: The UN Guiding Principles on Business and Human Rights (UNGPs)

Human Rights Policy & Commitment



VGI Human Rights Policy was developed in accordance with international human rights laws and standards, including the Universal Declaration of Human Rights (UDHR); the International Covenant on Civil and Political Rights (ICCPR); the International Covenant on Economic, Social and Cultural Rights (ICESCR); the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGPs); the Convention on the Rights of the Child; the Convention on the Rights of Persons with Disabilities; and the ILO Declaration on Fundamental Principles and Rights at Work.

The scope of the Human Rights Policy applies to all business activities and the value chain, throughout the Company's own operations (employees, business operations including products and services), business partners (suppliers and sub-contractors), subsidiaries, and joint ventures.

Human Rights Policy commitments:

- Respect and follow the human rights standards with zero tolerance towards, human trafficking, forced labour, child labour, discrimination, and harassment of any kind including sexual and non-sexual harassment.
- Support and commit to respect human rights principles regarding freedom of association, the right to collective bargaining and equal remuneration.
- Support and encourage all stakeholders to comply with human rights standards.
- Communicate, publish, educate, and support all stakeholders to conduct business activities under human rights standards.

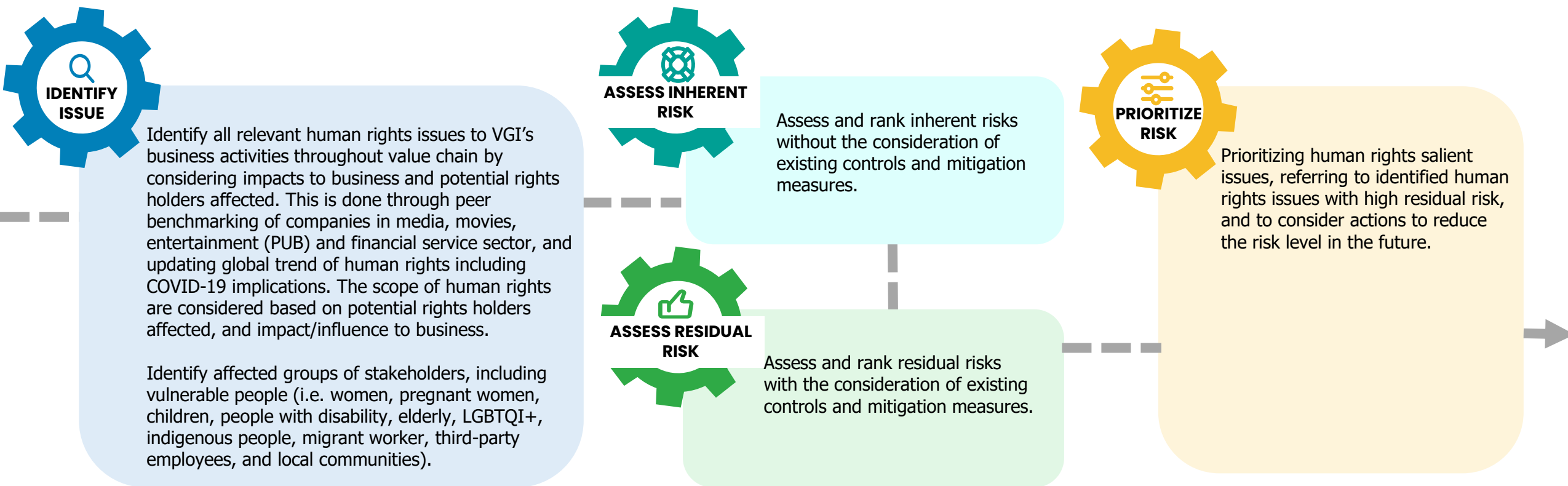
VGI's human rights management comprises of four key areas: employees; communities and environment; business partners; and customers.

Reporting and Disclosure: VGI commits to disclose the Company's human rights commitment and performance in the annual Sustainability Report and the Company's website.

Human Rights Risk Assessment

As part of the HRDD, VGI has conducted a Human Rights Risk Assessment (HRRRA) to identify human rights issues associated with the Company's business operations and value chain activities. The HRRRA covered 100% of VGI's own operations (i.e. products or services), subsidiaries, and joint ventures. The risk identification process will also cover new business relations (i.e. mergers, and acquisitions).

The objectives of the HRRRA are to identify, prevent and mitigate human rights risks and issues that are present in VGI's own business operations, associated activities and throughout the value chain. The risk assessment methodology are outlined below:



VGI Ecosystem

The scope and coverage of human rights risk assessment is throughout the Company's Offline-to-Online ("O2O") Marketing Solutions provision. VGI assesses human rights risks over businesses that the Company has management control and were operated for over 2 years, comprising of 1) Advertising and 2) Payment.

Advertising Business

Media Space Rental

Merchandising Space Rental

Payment Business

Payment

Rabbit Care

AEON Rabbit Member Card

Rabbit Cash

Human Rights Issues

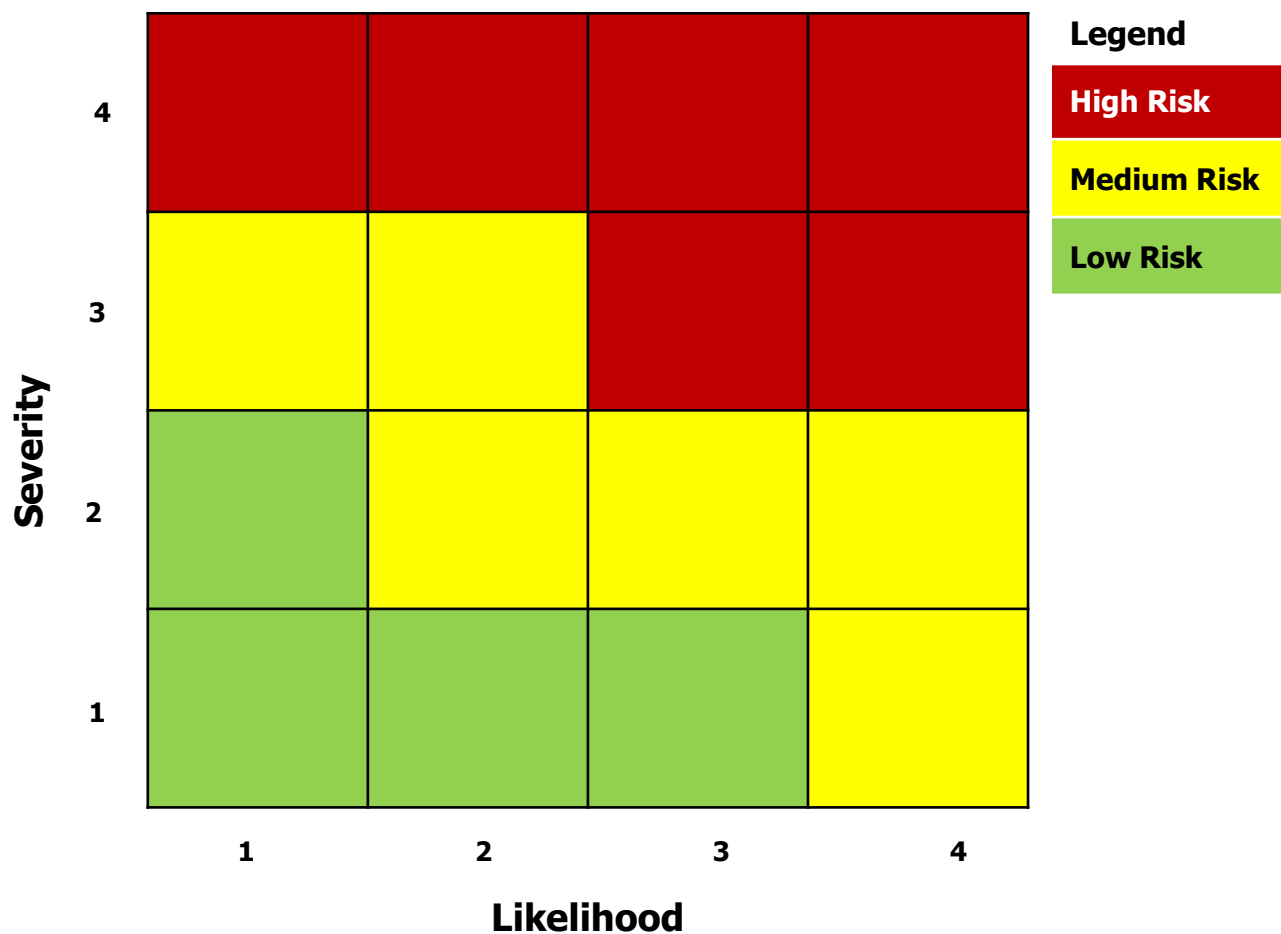
| Rights Holders | Employee | Community¹ | Customer² | Supplier/Contractor |
|--|---|---------------------------------------|-----------------------------|--|
| Human Rights Issues Assessed | Working Condition | Health and Safety | Health and Safety | Health and Safety (of suppliers/ contractors working in VGI's operations) |
| | Equal Remuneration | Standard of Living³ | Discrimination | Working Condition (of suppliers/ contractors working in VGI's operations) |
| | Health and Safety | Discrimination | Data Privacy | Discrimination & Harassment (of suppliers/ contractors working in VGI's operations) |
| | Discrimination & Harassment | | | Discrimination (in procurement process) |
| | Freedom of association and Right to collective bargaining | | | |
| | Illegal forms of labor (e.g. child labor, forced labor, human trafficking) | | | |
| | Security Forces/ Security Management | | | |
| Cybersecurity/ Information Security | | | | |

¹ Community refers to 1) general public.

² Customer refers to 1) media agency and 2) direct customers of VGI's product and service offerings.

³ Standard of living refers to the rights that everyone has for a standard of living adequate for himself/herself and his/her family, where elements of this rights include a) food; b) clothing; c) housing; d) medical care; and e) necessary social services.

Human Rights Risk Matrix



- ❖ The human rights risk assessment will be conducted using the risk matrix, as demonstrated. The matrix is used to determine the significance of the human rights risks through 2 dimensions: **Severity X Likelihood**.
- ❖ **The level of significance** allows VGI to prioritize and manage human rights issues in relation to their risk level.
- ❖ **Salient Issues** are issues with risk ranking at **"High"**.

Remark: Human rights salient issues are issues with high risk that the Company will prioritize to manage and address in order to reduce its severity and/or likelihood.

Human Rights Risk Assessment Criteria: Severity

Severity of risk and impact is defined by considering scale, scope, and remediability. The level of severity is determined by one of the considered factors, which has the highest level.

| Severity Level | Scale (seriousness of impact) | Scope (how many people are or will be affected) | Remediability (difficulty to restore the people impacted to a situation before impact) |
|---------------------|---|--|---|
| Critical (4) | Significant impact to health and safety: physical disability or fatality | Impact to all stakeholders in the group e.g. all of people in community, all of employee, all of supplier | Impossible to restore or will take longer than 5 years (>5 years) to restore the impact |
| High (3) | Moderate impact to health and safety: serious injury that needs rehabilitation (loss time injury) | Impact to most stakeholders in particular stakeholder group | Take 3-5 years to restore the impact |
| Medium (2) | Slight impact to health and safety: minor injury or illness (no loss time) | Impact to some stakeholders in particular stakeholder group | Take 1-3 years to restore the impact |
| Low (1) | Minor impact to health and safety: first aid case | No negative impact to stakeholder | Take less than a year (<1 year) to restore the impact |

Human Rights Risk Assessment Criteria: Likelihood

Likelihood is defined by considering likelihood of risk to occur in workplaces, communities, local context or nearby areas that are potential to be affected by business activities.

| Likelihood Level | Likelihood/ Frequency | Example |
|--------------------------|---|--|
| Very likely (4) | Occurs frequently or every year | Such human rights issues have occurred consistently from the past until present. |
| Likely (3) | Occurs very often or every 1-5 years | Such human rights issues have happened in the past and also occur very often at the present. |
| Unlikely (2) | Occurs rarely or every 5-10 years | Such human rights issues have happened in the past and also occur sometimes at the present, may occur in some organisations/business activities sometimes. |
| Very unlikely (1) | Almost never occurs or every 10 years or more | Such human rights issues have never occurred in our business operation, but have occurred in other operations of industry peers. |

VGI Human Rights Salient Issues (2021): Own Operation



100%

- ❖ **100%** of VGI's products and services provisions were assessed on human rights risks.



13.33%

- ❖ **13.33%** of VGI's products and services assessed were identified with human rights risk.
 - Community health & safety risk associated with merchandising space rental product



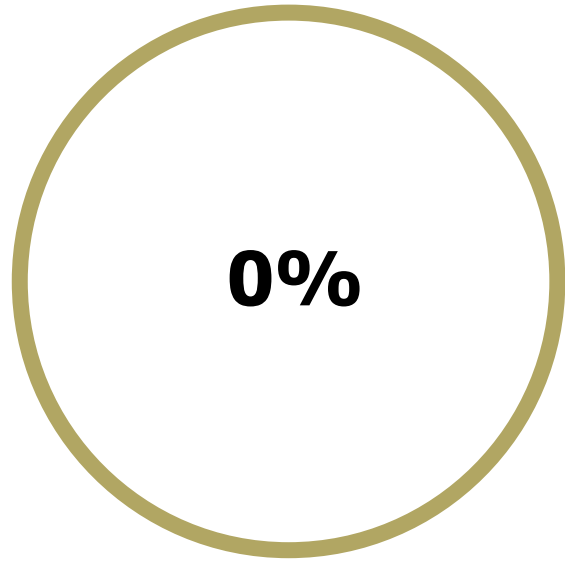
100%

- ❖ **100%** of VGI's products and services, identified with human rights risks, have mitigation actions taken.
- ❖ Moreover, all of VGI's assessed 2 business units (i.e. Advertising and Payment) and its associated products and services have mitigation plans implemented.

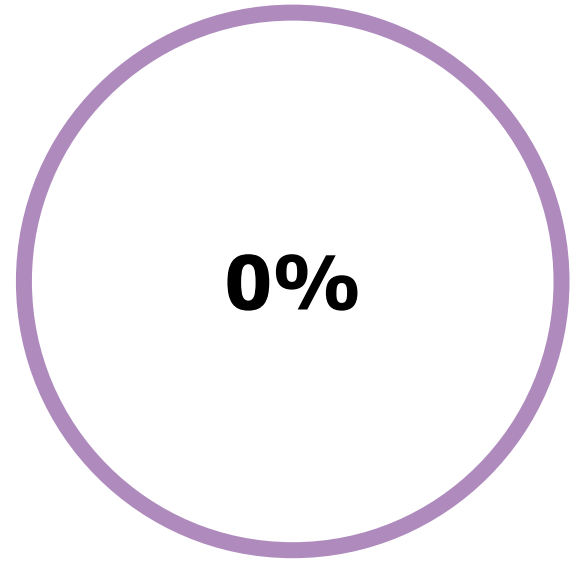
VGI Human Rights Salient Issues (2021): Tier 1 Suppliers*



❖ **100%** of VGI's tier 1 suppliers assessed were identified with human rights risks.



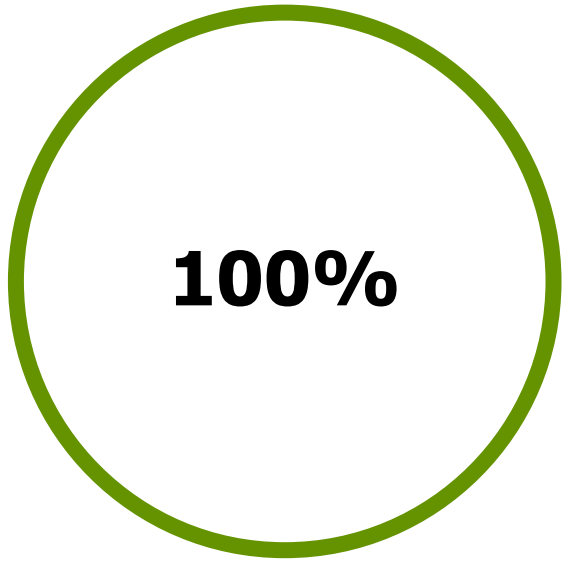
❖ **0%** of VGI's tier 1 suppliers were assessed with human rights risks.



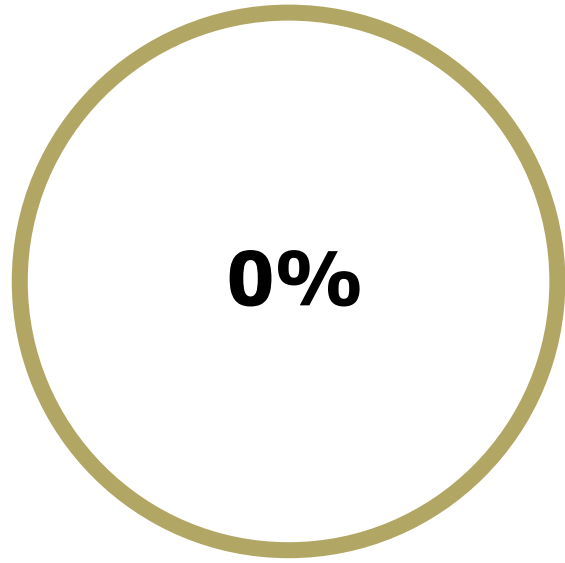
❖ **0%** of VGI's tier 1 suppliers, identified with human rights risks, have mitigation actions taken.

*Total of 79 tier 1 suppliers were assessed on human rights risks

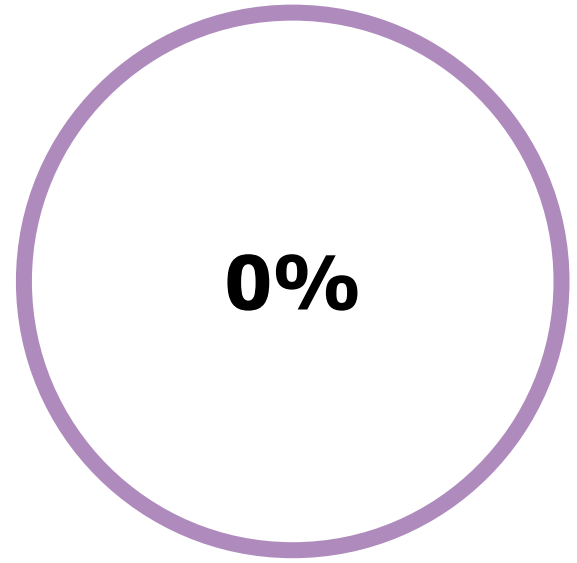
VGI Human Rights Salient Issues (2021): Joint Ventures*



❖ **100%** of VGI's joint ventures were assessed on human rights risks.



❖ **0%** of VGI's joint ventures assessed were identified with human rights risks.



❖ **0%** of VGI's joint ventures, identified with human rights risks, have mitigation actions taken.

* Refers to joint ventures at stakes above 10% and without management control. Information on VGI's joint ventures, please refer to VGI's [56-1 One Report 2021/22](#) pages 64-71.

Integrating Findings and Taking Actions

The findings and results from the human rights risk assessment, including the identification of salient issues, are used to assess and improve VGI's existing mitigation measures, actions and controls to ensure that it is effective in addressing the human rights issues that are present in the Company's own operations and throughout the value chain, and will be used as part of the development of additional measures, moving forward.



**Human Right Risks
and Impacts**

Mitigation Actions for Salient Issue

Community Health & Safety

Affected Rights Holders:

- Community

Vulnerable Groups:

- Women, pregnant women, children, people with disability, elderly, local communities

Product Associated:

- Merchandising Space Rental

Potential Human Rights Risk:

- Shops occupying merchandising spaces* causing potential blockage and obstacles in the area leading to health and safety risks.



Mitigation and Additional Measures:

- Stakeholder Engagement, Sustainable Development, Occupational Health & Safety, and Environmental Policies
- Corporate Governance Policy and Code of Conduct
- Provision of whistleblowing/ compliant channel for all rights holders, grievance mechanism with defined disciplinary action and escalation process
- Training and communicating of safety requirements to employees and tenants, respectively
- Regular inspection of merchandising rental shop to ensure compliance to VGI's prescribed standards, regulations and other requirements
- Customer and agency evaluation

*VGI has the rights to manage merchandising space on 31 BTS stations and is responsible for investment of the utility system and maintenance of the stations for the duration of the contract. Construction and decorations of the shops, which must be approved by VGI, are the responsibility of the tenants.

Tracking and Communication

In accordance with VGI's Human Rights Policy, the Company is committed to respect human rights for all stakeholders and vulnerable groups, as well as to prevent the occurrence of human rights issues and human rights violations that might have been directly and indirectly caused by VGI's own operation, value chain activities, supply chain and new business relations.

With the aforementioned commitment, VGI has also established various communication/complaint channels for all rights holders and vulnerable groups to raise concerns and/or report any human rights issues and violations related to VGI's business operations, and value chain activities. The data collected from this channel has enabled the Company to monitor VGI's human rights performance, and conduct stringent human rights issue investigation and human rights due diligence process which are the crucial factors for developing mitigation measures/ actions and remediation actions.

Additionally, VGI has regularly communicated human rights performance, such as human rights initiatives, human rights issues, human rights risks, human rights violations, mitigation measures/ actions and remediation actions, to stakeholders and vulnerable groups via VGI's Sustainability Report and Human Rights Disclosure.

Communication Channels

| | | |
|---------------------------------|-----------------------------------|--|
| <p>Internal Intranet</p> | <p>Doitright@vgi.co.th</p> | <p>Company Secretary Division VGI Public Company Limited 21 TST Tower, 9th Floor, Vibhavadi Rangsit Road, Chomphon, Chatuchak, Bangkok 10900, Thailand Tel: 0-2273-8884</p> |
|---------------------------------|-----------------------------------|--|

Remediation

VGI is committed to conducting human rights risk assessment within an appropriate timeframe in conjunction with preparing risk prevention and mitigation measures, providing reasonable remedies in cases of violations, monitoring and reporting performance, as well as reviewing policy commitment to ensure maximum effectiveness in human rights management. In case of human rights violations, VGI will take appropriate remediation actions involving compensation and other forms of remedy that shall amend the harm caused. These outcomes can be in any forms such as apologies, restitution, rehabilitation, financial or non-financial compensation, punitive sanctions and the prevention of harm.

Nonetheless, in 2021, there was no human rights violation case. Thus, there were no forms of remediation actions taken nor necessary. This was as a result of our rigorous human rights risks mitigations process in place.



Zero

Incident of discrimination and harassment



Zero

Human rights violations case