Human Rights Due Diligence Disclosure Report FY 2023/24

VGI

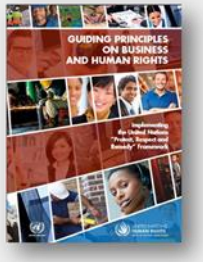
VGI Human Rights Due Diligence Process

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 2023/24, and will continue to systematically conduct and review the process every 3 years. The process were 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:

Policy commitment • **Assess actual and potential impacts** • **Integrate findings and take appropriate actions** • **Track and communicate performance** • **Remediate adverse impacts**



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

Human Rights Policy & Commitment

Human Rights Policy

VGI Public Company Limited

Effective on 23 March 2021

Reviewed and revised on 23 March 2022

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.

Reference: VGI Human Rights Policy

Human Rights Risk Assessment

As part of the HRDD, VGI has conducted a Human Rights Risk Assessment (HRRA) to identify human rights issues associated with the Company's business operations and value chain activities. The HRRA covered 100% of VGI's own operations (i.e. products or services), subsidiaries, tier 1 Suppliers and joint ventures. The risk identification process will also cover new business relations (i.e. mergers, and acquisitions).

The objectives of the HRRA 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:

IDENTIFY ISSUE

Identify all relevant human rights issues to VGI's business activities throughout value chain by considering impacts to business and potential rights holders affected. This is done through peer benchmarking of companies in media, movies, entertainment and financial service sector, and updating global trend of human rights. The scope of human rights are considered based on potential rights holders affected, and impact/influence to business.

Identify affected groups of stakeholders, including vulnerable people (i.e. women, pregnant women, children, people with disability, elderly, LGBTQI+, indigenous people, migrant worker, third-party employees, and local communities).

ASSESS INHERENT RISK

Assess and rank inherent risks without the consideration of existing controls and mitigation measures.

ASSESS RESIDUAL RISK

Assess and rank residual risks with the consideration of existing controls and mitigation measures.

PRIORITIZE RISK

Prioritizing human rights salient issues, referring to identified human rights issues with high residual risk, and to consider actions to reduce the risk level in the future.

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 3 years, comprising of 1) Advertising Business, 2) Digital Services Business and 3) Distribution Services Business.

Advertising Business	• Media Space Rental • Merchandising Space Rental • Office Media • Residential Media
Digital Services Business	• Rabbit Card • Rabbit Line Pay • Digital Media • Media Agency • Health and Life Insurance • Auto Insurance • Rabbit Selection • Co-branded Cards • Digital Lending
Distribution Services Business	• Retail business • Leasing business • Publishing business • Retail sale via the internet

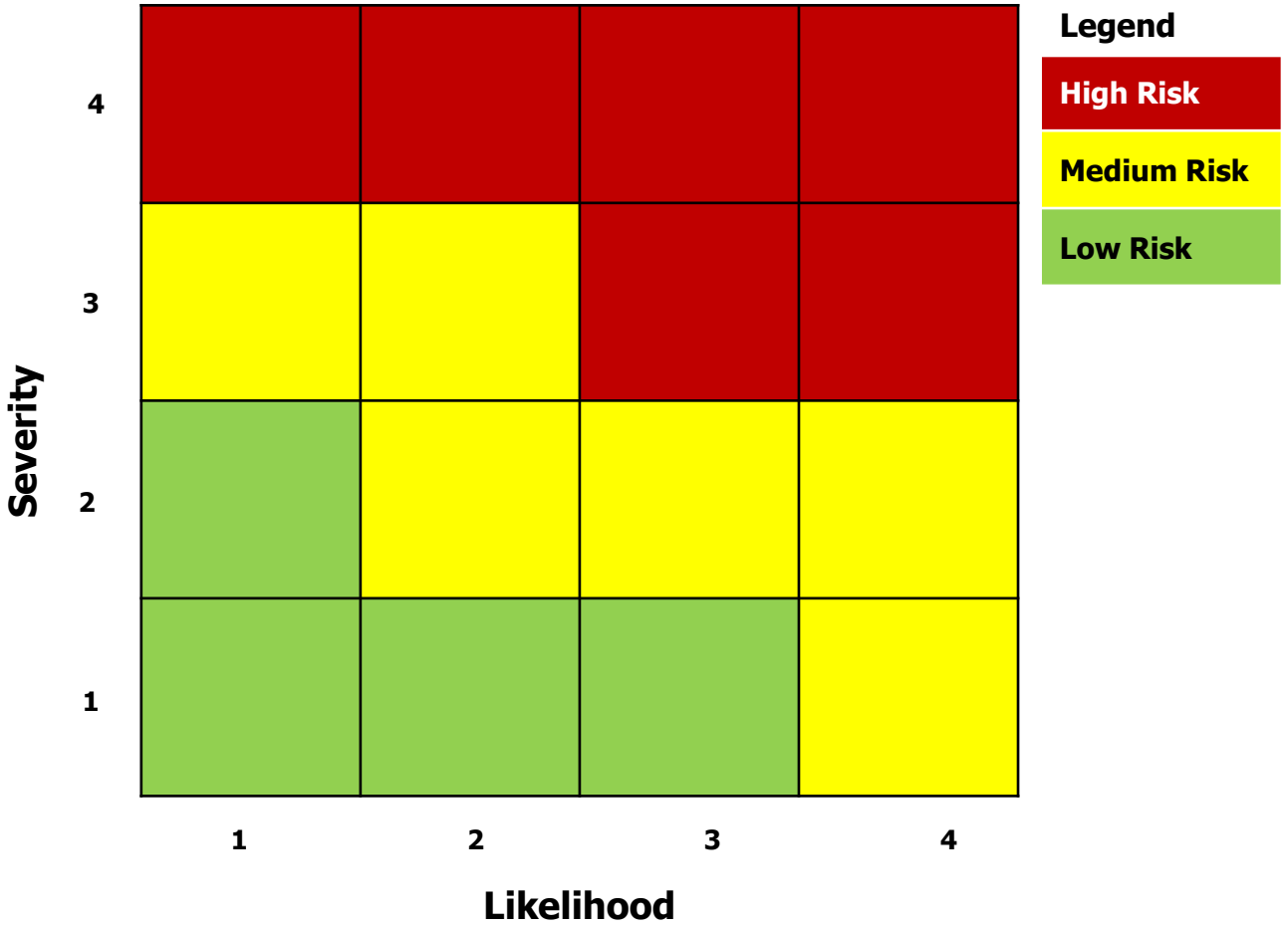
Please see Annual Report FY2023/24 on Section 2 for more details of VGI Ecosystem

Human Rights Issues

Rights Holders	Employee	Community[1]	Customer[2]	Supplier/Contractor
Human Rights Issues Assessed	**Working Condition**	**Health and Safety**	**Health and Safety**	**Occupational Health and Safety** (of suppliers/ contractors working in VGI's operations)
	Occupational Health and Safety	**Standard of Living***	**Discrimination**	**Working Condition** (of suppliers/ contractors working in VGI's operations)
	Discrimination & Harassment (including Equal Remuneration)	**Discrimination & Harassment**	**Cybersecurity/ Information Security/ Data Privacy**	**Discrimination & Harassment** (of suppliers/ contractors working in VGI's operations)
	Freedom of association and Right to collective bargaining			**Discrimination** (in procurement process)
	Illegal forms of labor (e.g. child labor, forced labor, human trafficking)			**Cybersecurity/ Information Security/ Data Privacy**
	Cybersecurity/ Information Security/ Data Privacy			
	Security Forces/ Security Management			

[1] Community includes 1) general public.
[2] Customer includes 1) media agency and 2) direct customer of VGI's product and service offerings.
* Standard of living refers to everyone has the right to a standard of living adequate for himself/herself and his/her family, this provision sets out some of the elements of this right: 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 Register

Rightsholders	Human Rights Issues	Risk Level
Employee	Working Condition	Low
	Occupational Health and Safety	Medium
	Discrimination & Harassment	Low
	Freedom of association and Right to collective bargaining	Low
	Illegal forms of labor	Low
	Cybersecurity/Information Security/Data Privacy	Medium
Community	Health and Safety	Medium
	Standard of Living	Medium
	Discrimination & Harassment	Low
Customer	Health and Safety	Low
	Discrimination	Low
	Cybersecurity/Information Security/Data Privacy	Medium
Supplier/Contractor	Working Condition	Low
	Occupational Health and Safety	Medium
	Discrimination & Harassment	Low
	Discrimination	Low
	Cybersecurity/Information Security/Data Privacy	Medium

Mitigation Measures on Saliant Issues

Human Right Issue: Health and Safety

Own Operation

Policy

- Occupational Health and Safety Policy
- Corporate Governance Policy and Code of Conduct
- Human Rights Policy
- Whistle Blowing Policy and Protection Measures

Training/ Management System, Process/ Procedure & Certification

- Company's employees receive training in accordance with safety standards
- VGI pays close attention to the health, well-being and safety of all employees. They have put in place a safety management system in compliance with international standards and applicable laws to provide a safe working environment and ensure the highest level of safety for staff.
- VGI regularly organises various health promotion activities for employees to strengthen the organisation's safety culture.
- Providing stress relax room and a program to reduce the employee's stress level at the workplace and general personal life through mentorship and counseling
- VGI has established protective measures for employees who submit the complaints and/or the witness who provides information regarding unfair treatment in the Human Resources Management Rules and Procedures.

Engagement Channel

- Whistleblowing channel

Contractors, Suppliers and Community

Policy

- - Human Rights policy
- - Code of conduct
- - Whistleblowing Policy + Complaint management

Management System, Process/ Procedure & Certification

- - Risk Management System
- - Grievance Mechanism

Mitigation Measures on Saliant Issues

Human Right Issue: Cybersecurity/Information Security/Data Privacy

Own Operation

Policy
- Human Rights Policy
- Corporate Governance Policy and Code of Conduct
- IT Security and Cybersecurity Governance
- Human Resources Privacy Policy
- CCTV Privacy Policy
- Established an information security policy

Training/ Management System, Process/ Procedure & Certification
- VGI received ISO/IEC27001:2013 (Information Security Management System) certification from the British Standards Institution (BSI)
- All employees received personal data protection training
- PDPA Training
- VGI has established protective measures for employees who submit the complaints and/or the witness who provides information regarding unfair treatment in the Human Resources Management Rules and Procedures.
- Conducts regular assessments of technical vulnerabilities of information technology systems
- Information Security Management

Engagement Channel
- Whistleblowing channel

Contractors, Suppliers and Community

Policy
- Customer Privacy Policy
- Corporate Governance Policy and Code of Conduct
- Human Rights Policy
- Responsible Content and Advertising Policy
- Ethical Branding and Marketing Policy
- IT Security and Cybersecurity Governance

Training/ Management System, Process/ Procedure & Certification
- VGI received ISO/IEC27001:2013 (Information Security Management System) certification from the British Standards Institution (BSI)
- Information Security Management
- VGI has other effective customer relationship management methods
- Conducting an annual customer satisfaction assessment

Engagement Channel
- Whistleblowing channel

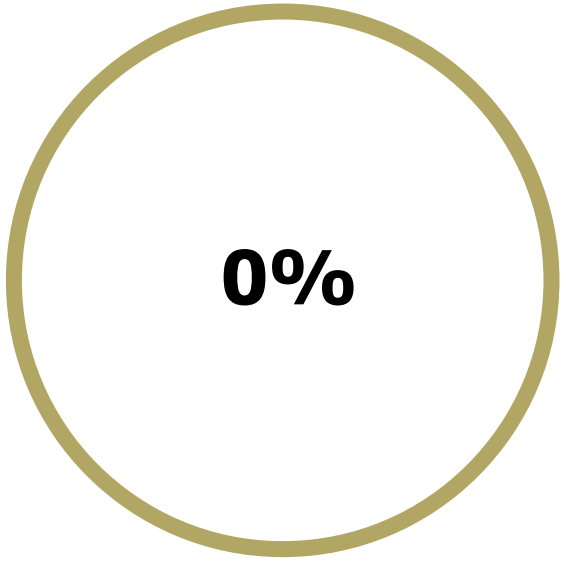
Mitigation Measures on Saliant Issues

Human Right Issue: Standard of Living

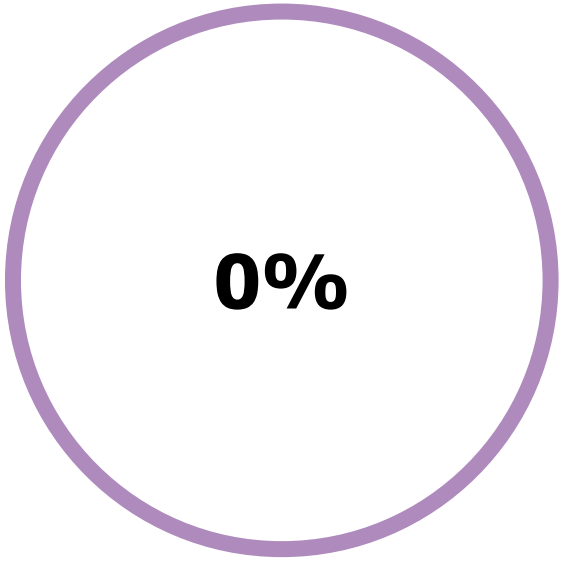
Contractors, Suppliers and Community
Policy • Human Rights Policy • Corporate Governance Policy and Code of Business Conduct • Policy on Social, Community and Environment Responsibility • Environmental Policy • Sustainable development policy • Stakeholder Engagement Policy **Training/ Management System, Process/ Procedure & Certification** • Protecting, Restoring, and Raising Awareness Towards Environmental Preservation • Public Health Improvement **Engagement Channel** • Whistleblowing channel

VGI Human Rights Salient Issues (2023/2024): Own Operation

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



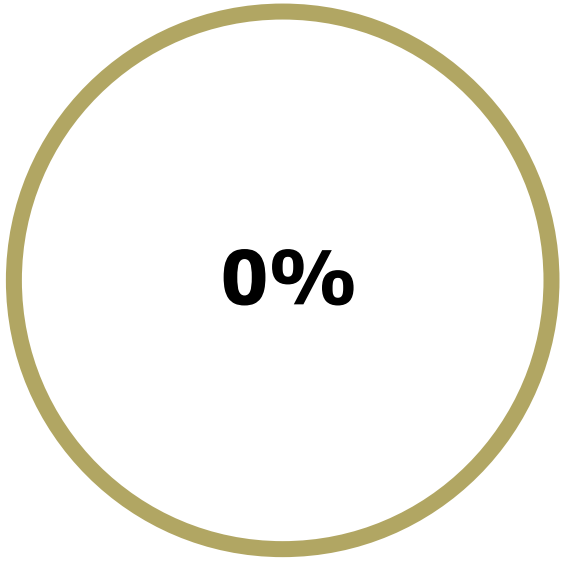
- **0%** of VGI's products and services assessed were identified on human rights with high risks.



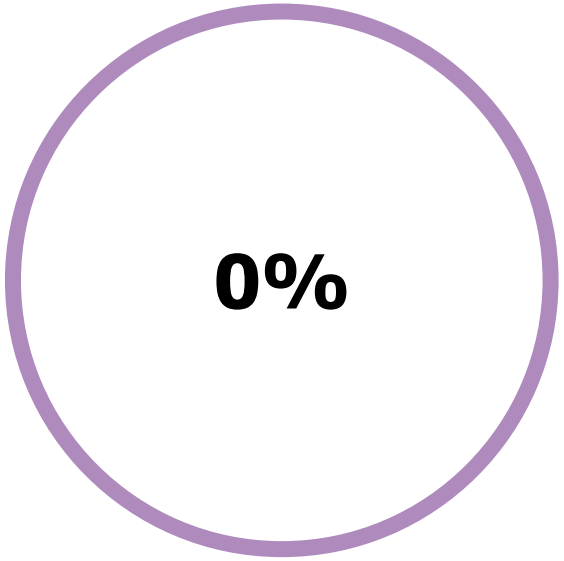
- **0%** of VGI's products and services, identified on human rights with high risks, have mitigation actions taken.
- Although, there are none VGI's products and services were assessed on human rights with "High Risks". The company has implemented mitigation measure taking in placed in order to prevent and control potential human rights risk to occur in the future.

VGI Human Rights Salient Issues (2023/2024): 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.

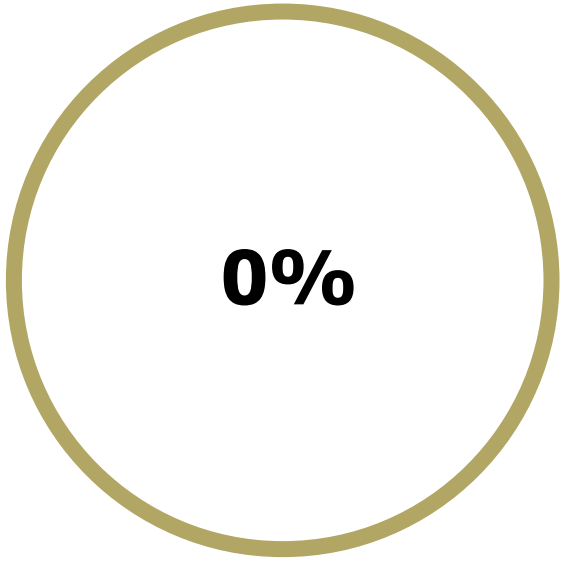


- **0%** of VGI's tier 1 suppliers, identified with human rights risks, have mitigation actions taken.

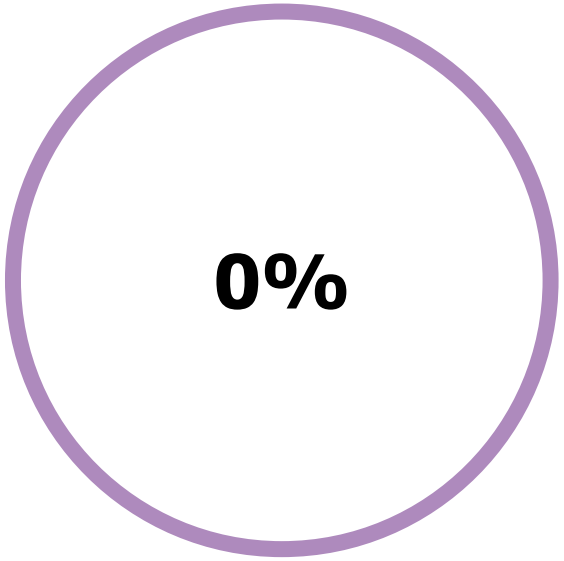
*Total of 193 tier 1 suppliers were assessed on human rights risks in FY2023/24

VGI Human Rights Salient Issues (2023/2024): 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 Annual Report 2023/24 in Section 5.2 for joint ventures at stakes above 10% and without management control.

Integrating Findings and Taking Actions

The findings and results from the human rights risk assessment, including the identification of high human rights risks (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

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 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

Internal Intranet	**Doitright@vgi.co.th**	**Company Secretary Division** VGI Public Company Limited 21 TST Tower, 9th Floor, Vibhavadi-Rangsit Road, Chomphon, Chatuchak, Bangkok 10900, Thailand Tel: 0-2273-8884 ext.391 Email: companysecretary@vgi.co.th

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 2023/2024, 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