



**Bangkok Chain Hospital Public Company Limited**

**Human Rights Due Diligence: HRDD**

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## **Human Rights Due Diligence: HRDD**

### **Bangkok Chain Hospital Public Company Limited**

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#### **1. Introduction**

Bangkok Chain Hospital Public Company Limited (“the Company”) and its subsidiaries operate businesses involving diverse stakeholders and employees. To mitigate the risk of human rights violations that may impact stakeholders, the Company has implemented a comprehensive Human Rights Due Diligence (HRDD) process in alignment with the United Nations Guiding Principles on Business and Human Rights (UNGP).

The HRDD process is designed to systematically identify, prevent, mitigate, and address human rights risks associated with the Company’s operations, consisting of the following key components:

- Announcing policies and principles to support the Company’s commitment to respecting human rights.
- Assessing actual and potential human rights impacts arising from the Company’s operations and activities.
- Integrating human rights policies into business processes and monitoring performance both internally and externally.
- Tracking and measuring the effectiveness of actions taken.
- Providing appropriate remedies and communication.

#### **Human Rights Due Diligence Process**

#### **2. Policy Declaration and Company Principles on Respecting Human Rights**

The Company and its subsidiaries are committed to promoting and safeguarding human rights in parallel with conducting business ethically and in accordance with good corporate governance. Human rights protections cover both internal and external stakeholders through the establishment of policies and practices aligned with internationally recognized standards. The Company strongly supports and complies with the Universal Declaration of Human Rights (UDHR) and the United Nations Guiding Principles on Business and Human Rights (UNGP), which are based on three core pillars: Protect, Respect, and Remedy. Additionally, the Company adheres to the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and strictly complies with national human rights laws in every country where it operates.

The Company has announced a Human Rights Policy that is internationally recognized, covering the protection of human rights both within the organization and externally. For more details, the full Human Rights Policy can be accessed on the Company's website at: <https://www.bangkokchainhospital.com/storage/document/cg/bch-human-rights-policy-th.pdf>.

### 3. Assessment of Actual and Potential Human Rights Impacts from Company Activities

The Company has conducted a survey to identify actual and potential risk issues in order to assess human rights risks related to its business operations. This assessment covers 100% of operational areas and the core business activities of the Company, its subsidiaries, and joint ventures, both those under management control and those without management control. In addition, the assessment also extends to the Company's business partners, focusing on three main areas: providing medical services to patients, procurement activities, and the construction of new hospitals.

The identification of potential human rights issues is carried out through a review of human rights concerns by analyzing various media sources and benchmarking with other companies in the same industry. Key issues identified include child labor, forced labor, all forms of abuse, and the right to workplace safety. Related at-risk groups include children and youth, women, pregnant women, migrant workers, customers, business partners, persons with disabilities, and the elderly.

### 4. Integration of Policy into Assessments and Internal and External Control Mechanisms

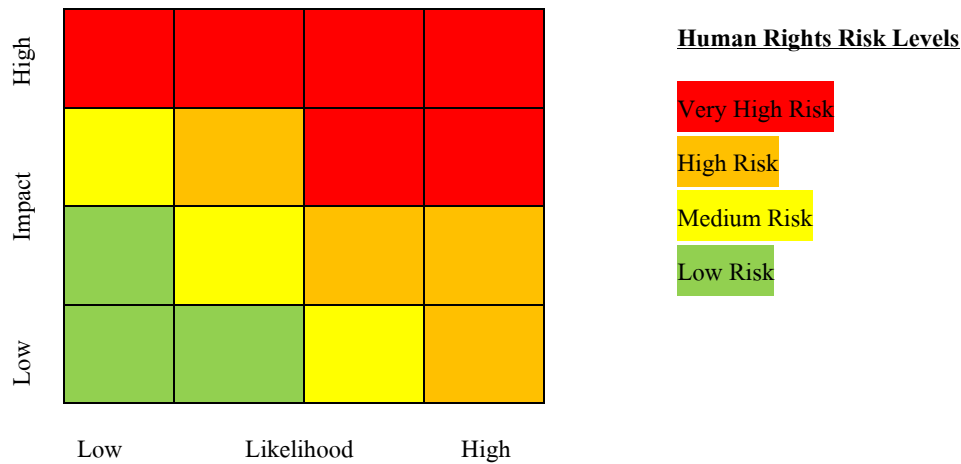
#### 4.1 Identification of Human Rights Issues

Practices for Employees	Practices for Communities	Practices for Customers	Practices for Business Partners
<ul style="list-style-type: none"><li>• Working environment</li><li>• Health and safety in the workplace</li><li>• Employee discrimination</li><li>• Harassment of employees in all forms</li><li>• Illegal labor practices</li></ul>	<ul style="list-style-type: none"><li>• Waste and hazardous materials management</li><li>• Community health and safety</li><li>• Land acquisition and forced relocation</li></ul>	<ul style="list-style-type: none"><li>• Data privacy</li><li>• Customer discrimination</li><li>• Harassment of customers in all forms</li><li>• Customer health and safety</li></ul>	<ul style="list-style-type: none"><li>• Protection of partner confidentiality</li><li>• Illegal labor practices</li><li>• Health and safety of partner employees</li></ul>

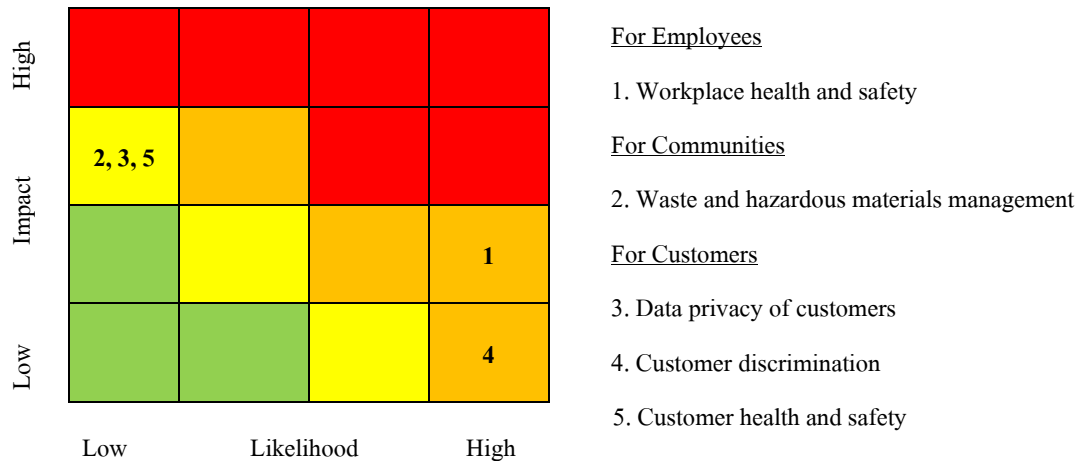
#### 4.2 Risk Level Assessment

The Company conducts human rights risk level assessments using a 4x4 matrix, taking into account both Impact Level and Likelihood. Human rights risk issues are categorized into four levels as follows:

### Human Rights Risk Assessment Matrix



The Company has prioritized five key human rights risk issues based on impact and likelihood, as follows:



### 4.3 Human Rights Risk Assessment Methodology

Criteria for assessing the likelihood of human rights risks occurring

Likelihood Assessment Criteria	ระดับ			
	Low	Medium	High	Very High
Likelihood	Occurs once every 5 years or has never occurred	Occurs once every 3 years	Occurs once every year	Occurs more than once per year

#### Criteria for Assessing the Impact Level of Human Rights Risks

Level	Scope		Remediation
	Quality of Life and Well-being	Safety and Occupational Health	
Low	Impact exists, but no need for national development plans for events	Minor injuries or mild illness	Recovery takes more than 1 year
Medium	Impact exists, requiring national development plans for events	Sick leave of 1–3 days	Recovery takes 1–2 years
High	Impact exists, and business operations must be halted to address events	Sick leave of more than 3 days	Recovery takes 2–3 years
Very High	Impact exists, and individuals must be relocated or displaced	Fatalities	Recovery takes more than 5 years or is not possible

#### 4.4 Integration

Risk Issues	Examples of Potential Risks	Mitigation Measures
Health and Safety in the Workplace	<ul style="list-style-type: none"> <li>Workplace accidents caused by employees not strictly following safety measures.</li> <li>Malfunctioning equipment leading to workplace accidents.</li> <li>Accidents resulting from workplaces not being suitable for employees with physical limitations.</li> </ul>	<ul style="list-style-type: none"> <li>Increase awareness of risks and hazards associated with work operations.</li> <li>Provide communication and training to ensure workplace safety.</li> <li>Conduct inspections and maintenance to keep equipment in proper working condition.</li> <li>Regularly monitor the working environment and compare results with legal standards.</li> <li>Conduct annual employee health check-ups, including general and risk-based health assessments.</li> <li>HA Standard</li> <li>JCI Standard</li> </ul>

<p>Waste and Hazardous Materials Management</p>	<ul style="list-style-type: none"> <li>● Contamination of water sources or surrounding communities by infectious waste.</li> <li>● Improper management of hazardous waste affecting nearby communities.</li> <li>● Foul odors from waste spreading to surrounding communities.</li> <li>● Hospital wastewater contaminating water sources or nearby communities.</li> </ul>	<ul style="list-style-type: none"> <li>● Implement waste management practices based on the 3Rs principle (Reduce, Reuse, Recycle).</li> <li>● Establish an Environmental Committee to set policies and plan operations.</li> <li>● Conduct training sessions to ensure employees understand proper and appropriate waste management methods.</li> <li>● Manage wastewater correctly using standardized treatment facilities.</li> <li>● Reuse treated wastewater through reverse osmosis systems in non-human contact areas.</li> </ul>
<p>Customer Data Privacy</p>	<ul style="list-style-type: none"> <li>● Leakage of customers' personal data</li> </ul>	<ul style="list-style-type: none"> <li>● Develop a customer data privacy policy.</li> <li>● Conduct employee training programs to raise awareness of proper handling and protection of customers' personal data.</li> <li>● Appoint a Data Protection Officer (DPO) and other relevant personnel.</li> <li>● Implement secure technologies for storing customers' personal data.</li> <li>● Establish communication and complaint channels for personal data issues.</li> </ul>

Customer Discrimination	<ul style="list-style-type: none"> <li>● Patients not receiving services according to the hospital's established standards.</li> <li>● Patients unable to access medical services due to issues related to differences and diversity.</li> </ul>	<ul style="list-style-type: none"> <li>● Participate in the Social Security Scheme for hospitals within the network.</li> <li>● Establish guidelines for equitable access to medical services, ensuring employees treat customers without discrimination or bias.</li> <li>● Participate in various government and foundation healthcare programs to serve all customer groups.</li> <li>● Conduct customer satisfaction surveys to improve service quality.</li> <li>● Provide interpreter services for international patients.</li> <li>● Arrange parking spaces and facilities for individuals with physical disabilities.</li> <li>● Provide prayer rooms for both customers and employees.</li> </ul>
Customer Health and Safety	<ul style="list-style-type: none"> <li>● Patient injuries caused by hospital accidents, such as tripping or slipping over obstacles.</li> <li>● Patient injuries resulting from employees failing to strictly follow operational procedures.</li> </ul>	<ul style="list-style-type: none"> <li>● Operate in compliance with HA standards.</li> <li>● Operate in compliance with JCI standards.</li> <li>● Develop an emergency management plan for hospital incidents.</li> <li>● Establish a business continuity plan at the hospital level.</li> <li>● Conduct regular employee training programs on patient care and service.</li> </ul>



		<ul style="list-style-type: none"> <li>● Evaluate procurement of medicines and medical supplies to ensure they meet safety and quality standards for patient care.</li> </ul>
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## 5. Monitoring and Reporting of Performance

The Company is committed to implementing a comprehensive monitoring and surveillance process for human rights risks, continuously improving its measures through stakeholder feedback and ongoing follow-ups. This process aims to effectively resolve issues and prevent potential risks by engaging stakeholders in human rights matters through training and awareness programs.

The Company has appointed a working group to collect information from complaints related to human rights violations raised by stakeholders. These findings are regularly reported to the Sustainability, Corporate Governance, and Risk Management Committee. In addition, the Company discloses its human rights performance through the annual sustainability report and publishes policies supporting human rights, along with channels for filing human rights-related complaints, on the Company's website.

### 5.1 Human Rights Performance in 2024

- **No** complaints regarding personal data from external parties or regulatory authorities in 2024.
- **No** complaints related to human rights violations, discrimination, sexual harassment, or harassment involving employees, patients, stakeholders, or business partners.
- **No** complaints concerning environmental issues arising from business operations that may violate the human rights of surrounding communities and society.
- **No** complaints regarding occupational health and safety in the workplace from internal employees.

#### Complaint Channels

Telephone	02-836-9937
Fax	02-106-4858
E-mail	<a href="mailto:report@bangkokchainhospital.com">report@bangkokchainhospital.com</a>
Company Website	<a href="http://www.bangkokchainhospital.com">www.bangkokchainhospital.com</a>
Postal Mail	<p>Submit the complaint form to:</p> <p><b>“Complaint Recipient”</b></p> <p>Bangkok Chain Hospital Public Company Limited</p> <p>World Medical Hospital Building, 22nd Floor</p> <p>44 Moo 4, Chaengwattana Road, Pak Kret Sub-district, Pak Kret District, Nonthaburi 11120, Thailand</p>

## **6. Remediation**

The Company is committed to minimizing the risk of potential human rights violations by conducting timely risk assessments to identify situations that may lead to human rights violations throughout the value chain. This includes implementing preventive and mitigating measures, with regular reviews to ensure maximum effectiveness.

In the event that a human rights violation occurs within the Company's operations, the Company will provide initial assistance, investigate the facts with relevant parties, and present the findings to the Sustainability, Corporate Governance, and Risk Management Committee, along with the Company's legal advisors. Together, they will determine fair and appropriate remediation actions, such as showing concern for the affected parties and offering non-monetary remedies at no cost. The proposed remediation actions will then be presented to the Board of Directors for consideration and approval.

## **7. Review and Improvement**

The Human Rights Due Diligence Report is overseen by the Sustainability, Corporate Governance, and Risk Management Committee through engagement with stakeholders and by learning from stakeholder experiences. This process aims to review appropriate methods to reduce risks and mitigate potential human rights impacts.

The Company will review and update the Human Rights Due Diligence Policy, human rights action plans, and performance reporting annually to ensure that implementation remains effective and up to date. Any revisions to the Human Rights Due Diligence Policy must be approved by the Board of Directors, and the updated guidelines must be communicated to all relevant parties.

Human Rights Due Diligence Report has been approved in accordance with the resolution of the Board of Directors Meeting No. 1/2025, held on January 13, 2025.