krungsri
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HUMAN RIGHTS DUE DILIGENCE REPORT 2025



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Human Rights Due Diligence Process

Bank of Ayudhya Public Company Limited (the Bank or Krungsri) recognizes the fundamental importance of respecting human rights in accordance with Thai and international laws, principles, and regulations. This commitment includes implementing robust measures to protect against and prevent human rights violations affecting all stakeholders, including employees, suppliers, vendors, contractors, customers, and local communities.

In alignment with the United Nations Guiding Principles (UNGPs) on Business and Human Rights, Krungsri conducts comprehensive **Human Rights Due Diligence (HRDD)**. The Bank maintains this as an ongoing process, acknowledging that human rights risks evolve alongside changes in business operations and the broader operating environment.

By identifying and evaluating potential issues across the entire value chain, the HRDD process enables Krungsri to implement effective mitigation strategies and minimize risks.



1 Policy Commitment

Scope of the Policy for Human Rights

This Policy applies to Bank of Ayudhya Public Company Limited and the companies under the Bank's financial business group where the Bank holds more than 50% shares, directly or indirectly, or the Bank has substantial control (Subsidiaries). Subsidiaries shall acknowledge this Policy, and either approve this Policy as their own Policy or use this Policy as a guideline to establish an equivalent policy to comply with this Policy.

This Policy is applicable to all operations of the Bank and Subsidiaries as well as its relevant stakeholders and rights holders in the value chain, which includes **all employees, suppliers, vendors, contractors, business partners, joint ventures, and other business relations, including new mergers and acquisitions, as well as customers and communities**. The policy also covers groups at risk and vulnerable groups that may be affected by the Bank's business and associated activities, such as women, pregnant women, children, LGBTQI+, elderly, people with disabilities, migrant workers, third-party employees, indigenous people, and local communities.

Basic framework for human rights

Krungsri and subsidiaries adhere to and places importance on the protection of and respect for human rights as well as labor practices of all employees and stakeholder groups, taking into account individual equality and non-discrimination, while focusing on appropriate human rights management in compliance with international regulatory requirements and principles regarding labor and human rights, e.g., **Universal Declaration of Human Rights (UDHR), ILO Declaration on Fundamental Principles and Rights at Work adopted by International Labour Organization (ILO), United Nations Guiding Principles on Business and Human Rights (UNGP), United Nations Global Compact (UNGC),** etc., in order to prevent and avoid actions that may violate human rights.

The policy commits in all our own operations and value chain activities to prohibit all forms of human trafficking activities and the use of forced and child labor, and to respect the following rights, but not limited to, the freedom of association, the right to collective bargaining, equal remuneration, digital security and privacy, health, and safety. This policy also commits to have zero tolerance against all forms of discriminatory actions and harassment (i.e., sexual and non-sexual harassment) and not to use security forces that conduct any form of human rights abuses or violations.

2 Risk and Impact Assessment

Krungsri evaluates both actual and potential impacts through a formal **Human Rights Risk Assessment (HRRA)**. Every two years, the Bank reviews and identifies human rights risks associated with its business activities across the entire value chain. This systematic evaluation is conducted through the following steps:

1 **Identify Human Rights Issues**

Determine human rights issues that exist or might arise in relation to Krungsri's operations throughout the value chain. The process addresses the actual or potential human rights issues that cause impact to relevant rights holders (employees, customers, communities, suppliers, and contractors), including vulnerable groups (third-party employees, women, pregnant women, children, migrant workers, indigenous people, LGBTQI+, people with disabilities). These issues include discrimination and harassment, right to privacy, environmental issues and community rights, human trafficking, forced labor, child labor, working conditions, equal remuneration, freedom of association, and right to collective bargaining.

2 **Inherent Risk Assessment**

Assess risk level without considering its existing mitigation measures and/or controls

3 **Residual Risk Assessment**

Assess risk level with considering its existing mitigation measures and/or controls

4 **Residual Risk Prioritization**

Prioritize human rights risks (salient issues), referring to identified human rights issues with medium and/or high residual risks, and consider actions to address and reduce the risk level in the future.

Human Rights risk and impact assessment

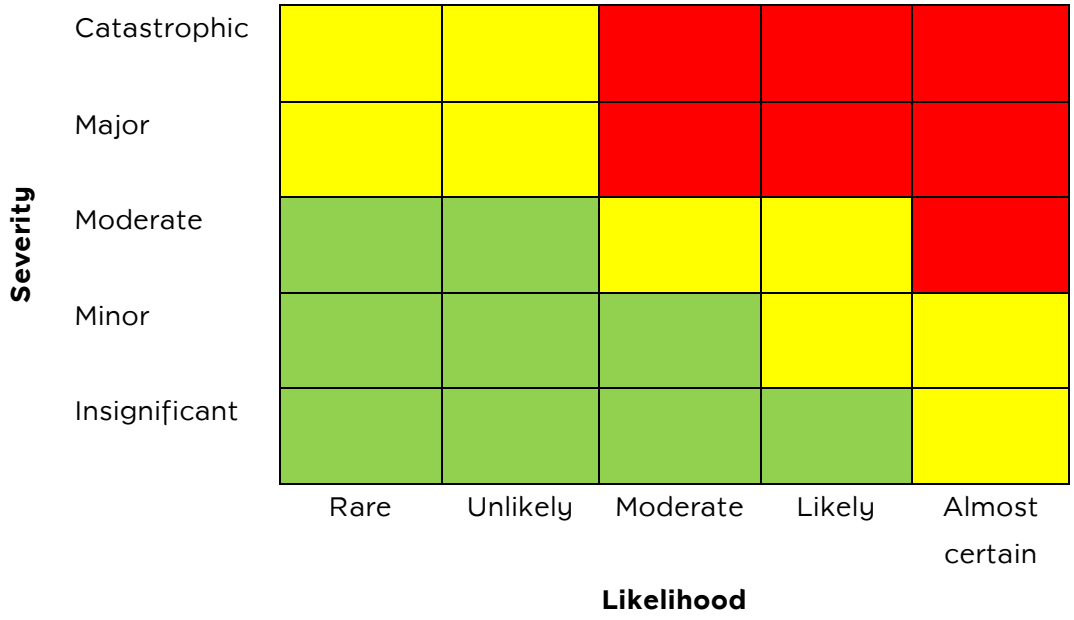
Scope of Assessment: Rights holders relevant to human rights issue practices

Customers	**Retail & Commercial** (Excludes Project Finance)	• Health and safety • Discrimination in the lending process and service practices • Security practices • Customer data privacy • Anti-money laundering
	Commercial (Project Finance only)	Community Rights: • Standard of living • Land acquisition and forced resettlement • Security practices • Bribery and corruption Labor Practices: • Working conditions/ health & safety/ security • Illegal labor in supply chains
Employees		• Working conditions • Occupational health and safety • Workplace discrimination • Unfair dismissal and termination • Unequal pay for employees • Workplace harassment • Employee data privacy • Freedom of association/ expression and right to collective bargaining • Illegal forms of labor (including human trafficking, forced labor, and child labor)
Suppliers/ Contractors		• Working conditions • Occupational health and safety • Illegal forms of labor (including human trafficking, forced labor, and child labor) • Supplier's discrimination in the screening process • Supplier's discrimination in the operating process • Supplier/ contractor data privacy

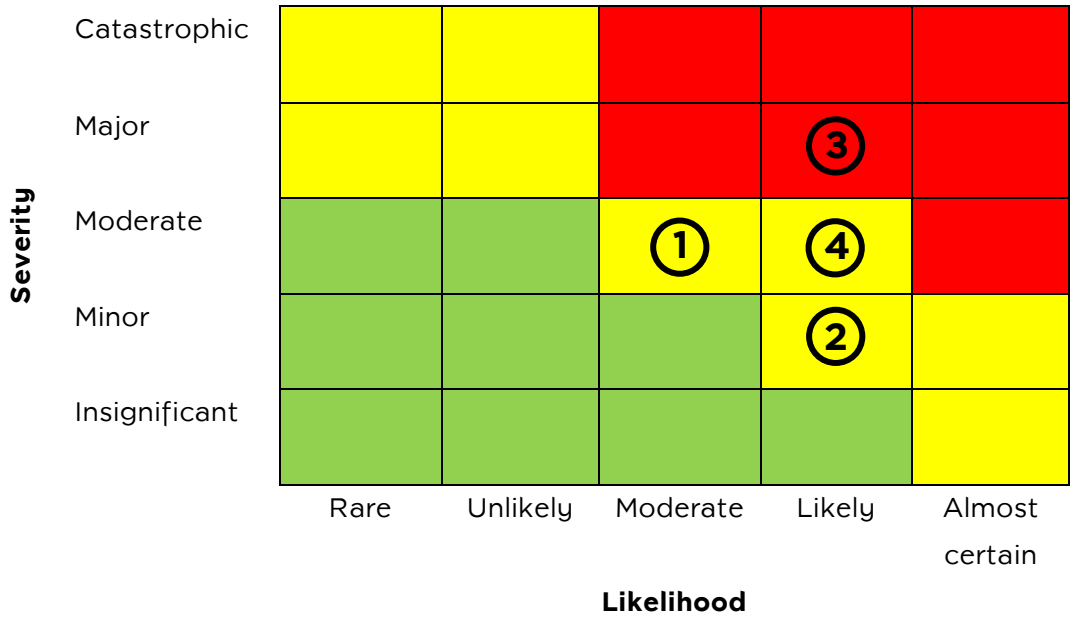
Inherent Risk Assessment, Residual Risk Assessment, Mitigation Measures, and Residual Risk Prioritization

Human Rights Risk Matrix:

- Krungsri used a **5x5 risk matrix** to conduct its human rights risk assessment. The y-axis represents the severity of risk and its impact, while the x-axis indicates the likelihood that a risk will materialize.
- In 2025, residual human rights risks ranked at **medium and high levels** are identified as salient human rights issues for Krungsri.



Level	Description
High	Immediate risk mitigation is required. Additional controls must be established to reduce the risk to an acceptable level.
Medium	Risks must be actively managed and closely monitored. Strict adherence to existing mitigation measures is required to maintain the current risk level and does not escalate to high levels.
Low	The risk is considered acceptable. Ongoing monitoring is conducted to ensure the risk level remains stable and does not escalate to medium or high levels.



	Right holders	2025 Salient Issues	Risk Level
1	Customers (Projects Finance)	Community Right: Standard of Living	Medium (3 x 3)
2	Employees	Working Condition	Medium (2 x 4)
3		Health and Safety	Hight (4 x 4)
4		Unfair Dismiss and Termination	Medium (3 x 4)

Human Rights Risk Assessment (Own Operations*)

Krungsri and subsidiaries conducted a comprehensive human rights risk assessment across all revenue-generating segments. We ensure that robust mitigation measures are implemented to address all identified risks effectively.



100% of Krungsri Group**'s revenue-generating operations were assessed, including:

- Commercial segment ***
- Retail segment
- Others segment



10.54% of Krungsri Group's activities and operations were identified as being exposed to salient human rights risks.

The potential salient issue identified was **Community Rights: Standard of living (Project Finance)**



100% of Krungsri Group's operations identified with potential human rights risks (salient issues) are covered by established mitigation measures and remediation processes.

Remarks:

* Own Operations including joint ventures where Krungsri has management control.

** Krungsri Group comprises the Bank, its subsidiaries, and its joint ventures.

*** Commercial segment refers to corporate (including Project Finance), small and medium-sized businesses and financial institutions.

Human Rights Risk Assessment in Supply Chain

Krungsri assessed human rights risks in **tier-1 suppliers/contractors' operations** and ensured that there are mitigation measures in place for all identified risks.



100% of Krungsri's tier-1 suppliers/contractors* were assessed.

(Remark: * 1,111 active suppliers/contractors were assessed.)



11.16% (124 out of 1,111) of Krungsri's tier-1 suppliers/contractors that were associated with potential human rights risks have been identified.

The potential high-risk issue identified in tier-1 suppliers/contractors was **Health and Safety.**



100% of Krungsri's tier-1 suppliers/contractors with potential human rights risks have mitigation measures and/or remediation process implemented.

Remark: * Scope of assessment: Tier 1 suppliers/contractors refer to those who directly supply products, and/or services to Krungsri.

3 Integration and Internal Management

Human Rights Salient Issues and Mitigation Measures

Krungsri Group's own operation: Commercial (Project Finance)

Topic (s)	Description (s)
Salient human rights issues	Community Rights (Standard of Living)
Rights holders and Vulnerable Groups at risk	Local communities, indigenous people, women, pregnant women, people with disabilities, LGBTQI+, children, migrant workers
Relevant human rights based on the Principles from International Bill of Rights	• Right to life (ICCPR [1/]) • Right to minorities and indigenous people (ICCPR) • Right to an adequate standard of living (ICESCR [2/]) • Right to health (ICESCR)
Existing mitigation measures	• Stipulate the Good Corporate Governance Principles and comply with the good governance guidelines of regulators as well as all relevant laws and regulations. • Stipulate "The Spirit and The Letter" (S&L) which is a code of conduct regarding integrity within the framework of laws and good governance. • Comply with the "Know Your Customer" (KYC) and Customer Due Diligence" (CDD) principles to ensure that the Bank's funds are not used to support, promote, or engage in any misconduct or create any negative impact on society nor the environment. • Establish the Policy and the Procedure for Credit Risk Management which serve as the criteria and guidelines for managing credit risks. The policy is communicated to the relevant officers for acknowledgement and strict adherence and for encouraging participation in maintaining the standards on credit risk underwriting and management. • Add human rights as one of the credit underwriting criteria for the business sector as specified in the Policy for Credit Risk Management, wherein the Bank will not support transactions related to violations of human rights, child labor or illegal workers, community relations and community rights, etc.

Topic (s)	Description (s)
	• Adhere to Sustainable Banking principles by focusing on Responsible Lending guidelines, under which credit underwriting takes account of ESG dimensions along with the economic dimension, prioritizing borrowers' debt affordability. In this regard, Krungsri established the Policy for Market Conduct and Responsible Lending as a guideline for employees of credit underwriting functions to strictly adhere to. • Establish the "Policy for Sustainability Lending" which serves as the guideline for granting loans while giving attention to ESG risks and aspiring to create positive outcomes for society and the environment. In addition, employees of all related business units must adhere to this policy and consider ESG risks for prudent credit underwriting. The policy determines the nature and types of transactions in credit underwriting including Prohibited Transactions, High Caution Transactions, Closely Monitored Transactions, and Sustainable Finance. • Establish the "ESG Center of Excellence" under the Corporate and Investment Banking Group. Responsible for addressing customer needs in ESG finance.
Additional mitigation measures	• Establish the Policy for Environmental and Climate Change Risk to serve as a basic framework in providing the structure to manage the environmental and climate change-related risk across Krungsri Group.

Remarks:

[1/] ICCPR refers to the International Covenant on Civil and Political Rights

[2/] ICESCR refers to the International Covenant on Economic, Social, and Cultural Rights

Employees

Topic (s)	Description (s)
Salient issues	• Working Condition • Health and Safety • Unfair Dismissal and Termination
Rights holders and Vulnerable Groups at risk	Women, pregnant women, LGBTQI+, people with disabilities, migrant workers
Relevant human rights based on the Principles from International Bill of Rights	• Right to health (ICESCR) • Right to an adequate standard of living (ICESCR) • Right to Life (ICCPR) • Right to liberty and security of person (ICCPR) • Right to fair trial (ICCPR) • Right to equality before the law (ICCPR) • Freedom from discrimination (ICCPR)
Existing mitigation measures	Working conditions and Health & Safety: • Stipulate the "Policy for Environment, Resource, Occupational Health, and Safety" as a guideline in establishing measures for workplace well-being and safety, as well as resource efficiency. • Promote a work environment free from incidents including workplace-related accidents, near misses, and illnesses. • Set targets of reducing accidents in the workplace to zero percent, while related committees stipulate preventive measures and guidelines to mitigate potential risks. • Control and assess workplace environment and file information about employees' and related parties' work-related injuries, accidents, and illness of employees and relevant persons. • Regularly assess the health risk of high-risk employees, such as employees carrying out document collection tasks • Provide Krungsri Clinic at the Head Office (19th floor) and Krungsri Ploenchit Office (12th floor) with physicians and nurses available for initial treatments. • Establish fire prevention and suppression plans, ensure that there are no materials or working conditions that could trigger fire, and organize annual fire evacuation drills in compliance with related laws.

Topic (s)	Description (s)
	• Establish contingency plans, including the needed equipment and resources, to be well prepared for emergencies such as disasters and emerging infectious diseases (EID). • Regularly conduct air quality assessment in the Bank's buildings to be at par with the standards, assess current and future environmental conditions as well as air quality in the areas of the Bank's operations, and notify employees accordingly, such as the PM 2.5 situation or the use of pesticides in the buildings. • Examine and ensure that lighting in the workplace is adequate and appropriate for operations in compliance with related regulatory requirements. • Stipulate measures to control loud noises caused by construction or renovation in the building to prevent and mitigate noise pollution, e.g., communication of noise pollution from activities for the acknowledgement of the staff or related parties, putting up warning signs, and providing temporary operational sites for employees. • Encourage employees at all levels to attend training on safety, occupational health, and the working environment, as well as organize activities and communicate through various channels to continuously raise awareness of safety and promote employee engagement, such as fire drills and evacuation, the CPR/AED Champion Project • Provide channels for workplace well-being, safety, and working environment complaints, as employees can make complaints through Krungsri's website (www.krungsri.com), Krungsri Call Center 1572, or directly inform the Safety, Occupational Health and Environment Committee via the email address committee.safety@krungsri.com, or "Security Center BAY" via the Line application. • Provide communication or warning signs in operational sites for employees

Topic (s)	Description (s)
	Unfair Dismissal and Termination: • Establish the "Human Resources Committee (HR Committee)" to advise on human resource policies and any significant changes regarding the human resource matters of Krungsri Group • Stipulate the "Policy for Human Resource" as a framework and guideline on human resource management and development process including recruitment, workplace environment, performance and compensation management, and employee development and career development • Establish the "Procedure for Recruitment and Hiring" so that the Bank's recruitment and hiring guidelines and steps are clear and standardized, as well as being in compliance with related regulations and policies. This procedure covers the fair recruitment and hiring of permanent employees, short-term employees, advisors, outsourced staff, and interns, with strict adherence to labor laws and regulatory requirements. Job applicants' qualifications and relevant attributes are considered without discrimination, while emphasis and value are placed on diversity, e.g., ethnicity, gender, age, religious belief or faith. In addition, the Bank focuses on employee and applicant privacy while taking into account data security and respect for the privacy rights of employees and applicants. • Focus on compliance with international legal requirements and frameworks of each country in which the Bank operates business • Formulate a "Termination Guideline", based on fairness Social Economic and Governance and compliance with labor laws, where "Terminated" employees are notified by the Human Resources Group upon or before their payday for that month so that the effective date of termination falls on the payday of the following month. In addition, severance and special severance are paid to such employees in compliance with regulatory requirements as well as the Bank's hiring rules, regulations, and requirements.

Topic (s)	Description (s)
	• Establish the "Nomination and Remuneration Committee" by the Bank's Board of Directors and establish the "Incentive Subcommittee" by the Human Resource Committee to revise, supervise, and approve principles, guidelines, plans, and other issues related to incentives or rewards, as well as the payment of incentives or rewards of the Bank and the companies in Krungsri Group. • Perform a survey and review of the remuneration payment and provision of employees' benefits on a regular basis to improve criteria or remuneration structures in line with the current labor market trends, as well as to ensure that the Bank's remuneration and benefits are competitive and corresponding to industry peers. • Provide appropriate benefits to support employees and their families, or reduce their cost of living and ease their financial concerns that will lead to their well-being and good operating performance.
Additional mitigation measures	• Develop safety manuals and regulations to promote knowledge of occupational health and safety, as well as guide safe working practices. • Review and revise the Human Resources Policy to ensure compliance with applicable regulations and policies.

Krungsri's Tier-1 Suppliers/Contractors

Topic (s)	Description (s)
Monitored potential risk issues	Health and Safety
Group of suppliers with potential high risk	• Advertising & Promotions/Marketing Related • Business Unit Operations • Building/Facilities Management/Central Administration Services
Rights holders and Vulnerable Groups at risk	Women, pregnant women, migrant workers, outsourced employees, people with disabilities, LGBTQI+
Relevant human rights based on the Principles from International Bill of Rights	• Right to health (ICESCR) • Right to an adequate standard of living (ICESCR) • Right to Life (ICCPR) • Right to liberty and security of person (ICCPR)
Existing mitigation measures	• Establish the "Supplier Code of Conduct" as a guideline to encourage all suppliers to adopt corporate governance guidelines and code of conduct standards in the same fashion as Krungsri Group did, particularly regulatory requirements related to their respective corporate governance guidelines, and principles of human rights such as fair treatment of workers, workplace well-being and safety, and expect suppliers to apply the principles to their business operations. • Establish the "Policy for Supplier Relationships" as a guideline to promote governance and ensure that they are treated and managed prudently, consistently, and in compliance with relevant laws and Krungsri Group's internal policies. • Stipulate a fair supplier selection process and offer equal opportunities to all suppliers, while setting human rights as one of the supplier selection criteria • Require that risk assessments be conducted on suppliers, both new and existing, in terms of their economic situation as well as environmental, social and governance (ESG) risks, according to specified evaluation or review criteria and through various channels such as questionnaires, business status verification, and supplier evaluations.

Topic (s)	Description (s)
	• Implement occupational health & safe working environment operational guidelines for suppliers to arrange a safe and hygienic working environment, safety guidelines, mitigation measures or management, as well as training and knowledge sharing on occupational health and safety for employees. • Communicate and disseminate knowledge to support and encourage the protection of and respect for human rights, as well as stipulate guidelines for monitoring and providing support to stakeholders in the business value chain, including suppliers
Additional mitigation measures	Review and revise the Supplier Code of Conduct to ensure compliance with applicable regulations and policies.

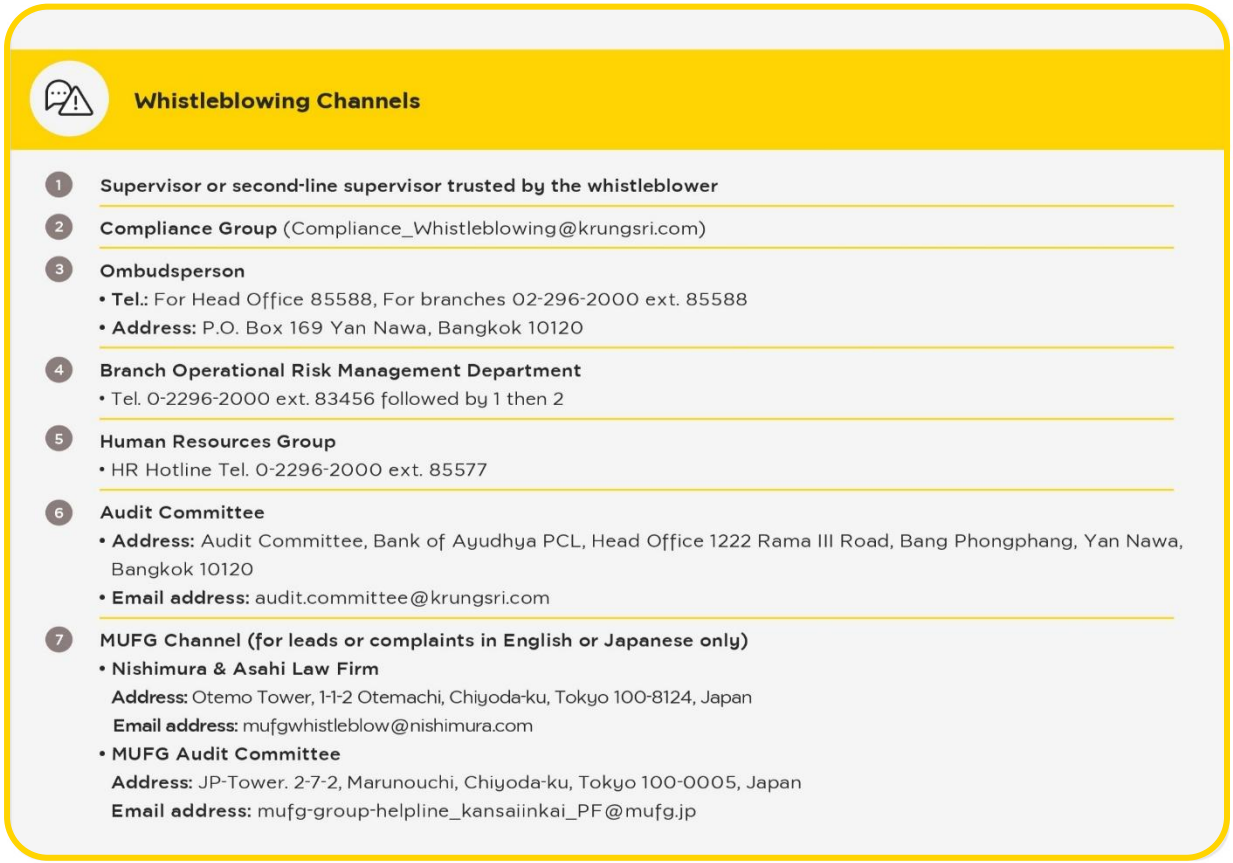


4 Monitoring and Reporting

Krungsri Group has established basic principles for whistleblowing pertaining to human rights and labor rights via the Bank's **whistleblowing channels** by encouraging the reporting of staff or related parties' actions that may violate human rights laws, policies, and procedures. In addition, whistleblowers and related parties are protected accordingly. Related facts will be monitored and verified, while progress and results are reported to whistleblowers and related committees for acknowledgement.



Whistleblowers or complainants can report matters or complaints through the following channels:



5 Remediation

Krungsri is committed to regularly reviewing and monitoring its human rights management and practices to ensure that appropriate steps and corrective actions have been taken to address human rights issues in both the Bank and subsidiaries' operations and the value chain, including all affected rights holders and vulnerable groups.

A systematic and effective approach to remediation requires several key elements:

1) Grievance Mechanisms: Establishing an accessible, trusted, and effective system where all stakeholders can report concerns without fear of retaliation.
2) Investigation: Thoroughly investigating the reported issue to determine the cause and impact.
3) Stakeholder Engagement: Actively involving the affected individuals and communities in the design and implementation of the remediation plan to ensure the remedy is appropriate and effective.
4) Collaboration: Working with other external organizations, government agencies, and civil society organizations to address systemic human rights issues is a demonstration of corporate accountability and is essential for building trust with affected stakeholders and preventing future human rights abuses.

Krungsri recognizes that remediation extends beyond mere financial compensation; it is a holistic process encompassing both procedural and substantive elements. Remedial actions may take various forms, including restitution, punitive sanctions, the facilitation of third-party remedies for affected individuals, financial or non-financial compensation, and formal public apologies.

