



## Human Rights Due Diligence Report: HRDD

Don Muang Tollway Public Company Limited

Revision No.	Effective Date	Revision details
00	01/08/2022	First edition
01	09/10/2024	Reviewed and updated for the year 2024

## Human Right Due Diligence: HRDD

### 1. Introduction

**Don Muang Tollway Public Company Limited (the “Company”)** is a private entity that holds a highway concession for financing, design, construction, operation, and maintenance of the “Uttara Phimuk Elevated Tollway.” This elevated highway operates under a contract with the Department of Highways, Ministry of Transport, and spans National Highway No. 31 along Vibhavadi Rangsit Road from Din Daeng to Don Muang, continuing northward. The full concession route extends 21 kilometers and serves as a key transportation corridor connecting Bangkok with its northern suburbs, as well as the upper central, northern, and northeastern regions of Thailand.

The Company and its subsidiaries are committed to conducting operations in accordance with principles of corporate governance and best practices, delivering high-quality and efficient services to all customer segments. The Company operates under a management framework that complies with all relevant legal standards, emphasizing transparency and accountability. Given the Company’s business scope involving various stakeholders and a diverse workforce, it performs comprehensive Human Rights Due Diligence (HRDD) to mitigate the risk of human rights violations that could impact operations. This HRDD process is implemented based on the United Nations Guiding Principles on Business and Human Rights (UNGPs).

### 2. Definitions

**“Company”** refers to Don Muang Tollway Public Company Limited.

**“Subsidiary”** refers to a company meeting any of the following criteria:

- (a) A company in which the Company holds more than 50% of the voting shares.
- (b) A company in which a company an entity as described in (a) holds more than 50% of the voting shares.
- (c) A company in which the Company or entity as described in (a) or (b) directly or indirectly holds more than 50% of the voting shares.

- (d) A company over which the Company or an entity as described in (a), (b), or (c) has control over financial and operational policy decisions to derive benefits from its activities.

*This definition aligns with the Securities and Exchange Commission's announcement, No. KorJor 17/2551.*

**“Human Rights”** refers to the inherent rights of all people, regardless of differences such as physical characteristics, race, color, religion, gender, nationality, age, or other statuses. These rights include life, freedom, political opinion, and equality without discrimination.

**“Vulnerable Group”** refers to individuals or groups who may lack the capacity to protect their rights and interests due to factors such as limited power, education, resources, or physical strength. This group includes women, people with disabilities, children, indigenous people, migrant workers, and LGBTQI+ individuals who may be particularly susceptible to human rights impacts.

**“Equality”** refers to the principle that everyone has equal rights and freedoms, without discrimination based on race, color, gender, religion, or other statuses.

**“Discrimination”** refers to unequal treatment of individuals by imposing additional burdens or denying equal benefits, rather than treating them fairly as entitled. This may also encompass harassment.

**“Harassment”** refers to unwanted comments or actions widely recognized as undesirable toward individuals. Non-sexual harassment may include defamation and bullying, while sexual harassment involves action or language of a sexual nature.

**“Freedom”** refers to the ability to act or refrain from action without pressure or restriction from others or the state, including freedom such as expression and religious freedom.

**“Legal Protection”** refers to an individual's right to justice and protection under the law when their rights are violated.

**“Prevention and Assistance”** refers to processes or measures aimed at preventing human rights violations and providing support to victims or affected individuals.

### 3. Goals and Objectives

The Company and its subsidiaries recognize the importance of human rights within their business operations. In line with this, the Company has declared its commitment through a Human Rights Policy and established guidelines under this policy, which reference the United Nations Guiding Principles on Business and Human Rights (UNGPs). The Company has also implemented a comprehensive Human Rights Due Diligence (HRDD) process to assess human rights risks. This is intended to prevent human rights violations and assess the potential human rights impacts on the Company's stakeholders, as well as the risks that may arise from the Company's business activities throughout the value chain.

### 4. Implementation Guidelines

The Company mandates a comprehensive annual Human Rights Due Diligence (HRDD) assessment at least once per year at the organizational level. This assessment aims to evaluate human rights impacts throughout the Company's value chain, including employees, business partners, suppliers, customers, communities, and society. The HRDD process is structured as follows:

- 1) **Policy Declaration and Commitment:** The Company has established and regularly reviews a Human Rights Policy, demonstrating its commitment to respecting and protecting human rights.
- 2) **Human Rights Risk Assessment:** The Company defines the scope of risk assessments to cover all business activities, identifying potential human rights risks related to business operations, and evaluates these risks and impacts.
- 3) **Mitigation and Prevention Measures:** The Company implements mitigation measures for high-risk human rights issues, aiming to reduce the impact on relevant stakeholders.
- 4) **Monitoring and Reporting:** The Company regularly audits and assesses human rights risks across all relevant departments, communicating assessment results to stakeholders to foster awareness and a culture of respect for human rights in line with its Human Rights Policy.

- 5) **Remediation:** The Company provides fair remediation for those impacted by human rights violations arising from business activities and ensures affected individuals receive appropriate follow-up and care.

## 5. Human Rights Policy Declaration

Don Muang Tollway Public Company Limited (the “Company”) operates a concession highway project along National Highway No. 31, covering Vibhavadi Rangsit Road from Din Daeng to Don Muang and extending northward. The Company’s primary revenue comes from toll collection, providing high-quality, efficient services. The Company emphasizes the promotion and protection of human rights both within and outside the organization, establishing human rights policies and practices in line with established standards. The Company is committed to the United Nations Guiding Principles on Business and Human Rights (UNGPs), which are based on three pillars: **Protect** (human rights protection), **Respect** (respect for human rights), and **Remedy** (remediation). Additionally, the Company strictly adheres to domestic human rights laws in its areas of operation to prevent human rights violations, such as child labor, discrimination against vulnerable groups, and restrictions on rights and freedoms.

The Company requires all directors, executives, and employees to be informed of and adhere to this Human Rights Policy. It also encourages business partners, including suppliers and contractors, over whom the Company has no direct management control, to follow this policy. The policy is publicly available to ensure that all stakeholders are well-informed. Furthermore, the Company provides a channel for human rights complaints, accessible on its website at <https://www.tollway.co.th>.

## 6. Human Rights Risk Assessment

The Company conducts human rights risk assessments to identify potential risks arising from its business operations, considering stakeholders both inside and outside the organization who may be directly or indirectly affected by the Company’s activities across the value chain. The assessment process takes into account vulnerable groups and local communities potentially

impacted by business activities. The human rights risk assessment covers issues of equality, legal protection, and discrimination, evaluating risks associated with the Company's core business activities.

Primary activities	Study/planning/ project investment	Design / Construction	Procurement (Materials, Operation Vehicles and O&M System Installation)	Operation /Maintenance (Includes Improvement Replacement)	User / Customer (Includes after- sales service)	Asset Return to Department of Highways
Stakeholders	<ul style="list-style-type: none"> <li>Shareholders</li> <li>Employees</li> <li>Companies in the same industry</li> <li>Partners</li> <li>Government agencies and relevant regulatory bodies</li> <li>Creditors</li> </ul>	<ul style="list-style-type: none"> <li>Employees</li> <li>Companies in the same industry</li> <li>Partners</li> <li>Government agencies and relevant regulatory bodies</li> <li>Creditors</li> <li>Community, society and environment</li> </ul>	<ul style="list-style-type: none"> <li>Employees</li> <li>Partners</li> <li>Creditors</li> <li>Community, society and environment</li> </ul>	<ul style="list-style-type: none"> <li>Shareholders</li> <li>Employees</li> <li>Companies in the same industry</li> <li>Partners</li> <li>Government agencies and relevant regulatory bodies</li> <li>Creditors</li> <li>Community, society and environment</li> </ul>	<ul style="list-style-type: none"> <li>Tollway users</li> <li>Employees</li> <li>Partners</li> <li>Government agencies and relevant regulatory bodies</li> <li>Community, society and environment</li> </ul>	<ul style="list-style-type: none"> <li>Shareholders</li> <li>Partners</li> <li>Employees</li> <li>Government agencies and relevant regulatory bodies</li> </ul>

**Figure 1: Business Value Chain and Relevant Stakeholders**

## 6.1 Identification of Human Rights Issues

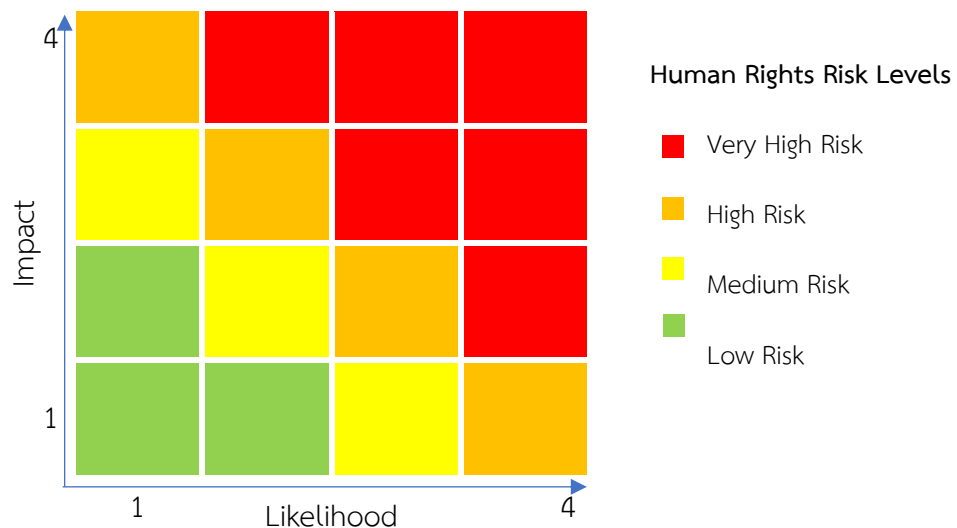
The Company has assessed and identified potential human rights risk issues that may arise from its business operations across the entire value chain. This process aims to establish preventive and mitigating measures for human rights impacts within the Company's operations, covering all areas and individuals who may be affected.

Guidelines for Employees	Guidelines for Partners	Guidelines for Customers	Guidelines for Communities and Society
<ul style="list-style-type: none"> <li>• Work Environment</li> <li>• Occupational Health and Safety</li> <li>• Non-Discrimination in Employment</li> <li>• Prevention of Illegal Labor Practices</li> <li>• Prevention of All Forms of Employee Harassment</li> </ul>	<ul style="list-style-type: none"> <li>• Confidentiality of Contractual and Partner Information</li> <li>• Prevention of Illegal Labor Practices</li> <li>• Health and Safety of Contractual and Partner Employees</li> </ul>	<ul style="list-style-type: none"> <li>• Data Privacy</li> <li>• Customer Data Security</li> <li>• Non-Discrimination of Customers</li> <li>• Prevention of All Forms of Customer Harassment</li> <li>• Efficient Grievance Mechanism</li> </ul>	<ul style="list-style-type: none"> <li>• Standards of Living and Quality of Life</li> <li>• Community Occupational Health and Safety</li> <li>• Business Operations Impact on Climate Change</li> </ul>

**Figure 2:** Human Rights Issues

## 6.2 Risk Prioritization

The Company has established criteria for assessing human rights risk levels, considering the likelihood of occurrence and impact level. Risks are categorized into four levels: Very High, High, Medium, and Low. This risk prioritization is presented in the following matrix:



**Figure 3:** Human Rights Risk Assessment Table

### Risk Assessment Criteria

Likelihood Levels	
(4) High Likelihood	Human rights violations have occurred multiple times within the area per year (more than once a year).
(3) Moderate Likelihood	Human rights violations occur occasionally (once per year).
(2) Low Likelihood	Human rights violations occur infrequently within the area (once every three years).
(1) Very Low Likelihood	Human rights violations are very rare, but possible (once every five years or have never occurred).

Impact Levels	
(4) High Impact	Broad impact extending beyond the Company's operational scope, requiring all activities to cease to mitigate the event, with recovery taking over one year.
(3) Moderate Impact	Affects a number of stakeholders in the operational area, with recovery taking six months.
(2) Low Impact	The Company cannot address human rights concerns from internal or external stakeholders, with recovery taking three months.
(1) Very Low Impact	Human rights impacts are manageable through the Company's grievance mechanisms, with recovery taking less than one month.

The Company has prioritized human rights risks based on their impact and likelihood of occurrence, identifying the following four key issues:

- 1) Employee health and safety in the workplace
- 2) Health and safety of partner employees
- 3) Customer data privacy
- 4) Impact of business operations on climate change

## 7. Mitigation and Prevention Measures

The Company has established guidelines for mitigating and preventing human rights risks to control and reduce impacts to an acceptable or minimal level. For high and very high-risk issues, the Company implements urgent risk management actions to minimize negative impacts



and bring the risk level down to an acceptable range. This includes developing action plans to reduce risks and conducting regular monitoring of risk management efforts.

Risk management from the four prioritized human rights risk issues involves analyzing potential risks and implementing impact mitigation measures and corrective processes as follows.

Risk Issue	Related Issues	Mitigation and Remediation Approach
1) Workplace Health and Safety	<ul style="list-style-type: none"> <li>Workplace accidents</li> <li>Safety equipment not meeting legal standards</li> <li>Work environment conditions</li> </ul>	<ul style="list-style-type: none"> <li>Regular employee fitness checks and equipment performance evaluations</li> <li>Annual health check-ups based on risk factors</li> <li>Implementation of an internal control system to monitor and review compliance with relevant safety regulations, with a dedicated team conducting regular on-site inspections</li> <li>Monitoring of noise levels, lighting, and working hours in accordance with legal requirements</li> </ul>
2) Health and Safety of Partner Employees	<ul style="list-style-type: none"> <li>Workplace accidents</li> <li>Work area conditions and safety equipment not meeting legal standards</li> </ul>	<ul style="list-style-type: none"> <li>Establishing a monitoring and review system to ensure partner compliance with relevant safety regulations, along with a team conducting regular site visits to evaluate partners</li> </ul>
3) Customer Data Privacy	<ul style="list-style-type: none"> <li>Customer data breaches</li> </ul>	<ul style="list-style-type: none"> <li>Establishing a Company Personal Data Protection Committee and ensuring Company operations comply with data protection regulations</li> <li>Regularly assessing and reviewing the Company's cybersecurity readiness</li> </ul>

Risk Issue	Related Issues	Mitigation and Remediation Approach
4) Business Impact on Climate Change	<ul style="list-style-type: none"> <li>● Company operations contributing to climate change</li> </ul>	<ul style="list-style-type: none"> <li>● Implementing measures to reduce electricity, water, paper, and fuel usage</li> <li>● Transitioning to renewable energy by installing solar panels on office buildings and toll booths</li> </ul>

The Company has established operational measures to address human rights impacts and to prevent and avoid recurrence. The Company coordinates with affected or potentially affected parties, including employees, business partners, contractors, suppliers, customers, communities, and society, to manage impacts and resolve human rights issues effectively.

## 8. Monitoring and Reporting

The Company conducts ongoing monitoring of human rights activities, providing regular training and education on human rights to its personnel to prevent high-risk negative impacts arising from business activities. This ensures that mitigation measures are effective and sufficient to manage impacts, and it includes tracking actions to prevent recurrence. The Company has established key indicators for monitoring and controlling human rights risks:

- Employee satisfaction assessment
- Zero Accident Target
- Zero Violence Incident Target
- Goal to reduce greenhouse gas emissions from business activities

Additionally, the Company publishes annual human rights performance results in its Sustainability Report and on its website. Channels are available for stakeholders to submit feedback, complaints, or whistleblower reports related to human rights violations within the Company's business operations. Protective mechanisms for employees and whistleblowers include a confidential database accessible only to relevant personnel, and an independent

committee, with no vested interest in the complaint, is established to investigate and respond per company policy.

### **Communication Channels**

- **Audit Committee or Company Secretary** Don Muang Tollway Public Company Limited  
40/40 Vibhavadi Rangsit Road, Sanam Bin Sub-district, Don Mueang District, Bangkok 10210
- **E-mail : Chairman of Audit Committee:** [somnuk.cha@tollway.co.th](mailto:somnuk.cha@tollway.co.th)  
**Company Secretary :** [companysecretary@tollway.co.th](mailto:companysecretary@tollway.co.th)
- **Website :** [www.tollway.co.th](http://www.tollway.co.th)
- **Phone :** 02-792-6500
- **Tollway Call Center 1233**

## **9. Negotiation**

The Company facilitates communication between management and employees regarding employee benefits through a Welfare Committee established under Section 96 of the Labor Protection Act B.E. 2541. This committee includes elected employee representatives, selected based on criteria and methods set by the Director-General, who meet quarterly with management representatives appointed by the employer, as required by law. This process demonstrates the Company's support for workers' rights in line with the Universal Declaration of Human Rights (UNGP), aiming to enhance employees' quality of life and workplace safety.

## **10. Remediation**

The Company acknowledges that its business processes and activities may cause or be linked to human rights violations involving stakeholders or within its value chain. Therefore, the Company is committed to minimizing risk and preventing potential human rights violations in line with its Human Rights Policy. An annual human rights risk assessment is conducted to evaluate opportunities and review situations or factors, both internal and external, related to human rights violations in the Company's processes and activities. Measures are then implemented to mitigate impacts and prevent recurrence.

For remediation and rehabilitation of those affected by human rights violations, the Company considers fair assistance, compensation, and remediation, either financial or otherwise, on a case-by-case basis, covering both short- and long-term needs. This is to alleviate impacts arising from the Company's activities and prevent both intentional and unintentional recurrence. The Company's remediation and restoration processes are aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs) as follows:

- 1) **Systematic, Independent, and Fair Monitoring:** This includes regularly gathering stakeholder feedback, concerns, and impacts, as well as maintaining an effective grievance mechanism for timely resolution and mitigation.
- 2) **Collaboration with External Agencies:** Involves setting up remediation processes with relevant external parties, such as government agencies, independent academics, or specialists.
- 3) **Effective and Transparent Operational-Level Remediation Mechanism:** This mechanism ensures fairness, equality, transparency, and auditability and includes protective measures for complainants and whistleblowers.

In cases of human rights violations, the Company has a fair investigation process and disciplinary measures for any violations caused by Company personnel, as per the Company's work regulations:

- Verbal warning
- Written warning
- Unpaid suspension for up to 7 days
- Dismissal without severance

Annual Review Edition 2024

Announcement as of October 11, 2024

- Signature-  
(Dr. Sakda Pannawai)  
Managing Director