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Human Rights Due Diligence : HRDD



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Preface


Jaymart Group Holdings Public Company Limited has continuously strengthened its commitment to human rights by developing a Human Rights Policy that emphasizes best practices and respect for employees and stakeholders. This effort has progressed toward a comprehensive human rights due diligence process, based on the UN Guiding Principles on Business and Human Rights (UNGPs). This requires the company to assess human rights issues not only within its own operations but also with key business partners, as well as within the same industry group. The assessment covers both past incidents and potential future risks, following a value chain-based approach to identify activities that may cause adverse impacts and the individuals who may be affected.

The human rights management process encompasses the following steps:

1. Establishing a Human Rights Policy
2. Identifying and assessing potential human rights impacts from company activities
3. Implementing preventive and mitigating measures to address potential adverse impacts
4. Monitoring, reviewing, and auditing human rights issues
5. Communicating with stakeholders and the public
6. Providing remedies and remediation

This comprehensive human rights checklist serves as a tool to identify issues that fall within the company's operational scope and may currently or potentially affect stakeholders. It also extends to identifying human rights issues involving the company's key partners. The tool enables the company to manage human rights risks more effectively by uncovering areas where further improvement is needed, or where risks remain unaddressed or inadequately managed.


Once the company becomes aware of any activity that may cause harm to any stakeholder group, it will implement preventive measures to minimize or eliminate such impacts and ensure no recurrence. Furthermore, the company will establish appropriate remediation guidelines for affected individuals and provide clear direction for the responsible departments to take action.

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- Scope of the Comprehensive Human Rights Management Process



- 1 Establish a Human Rights Policy
- 2 Identification of issues and assessment of potential impacts from business operations
- 3 Implementation of preventive and mitigation measures to address potential negative impacts
- 4 Auditing, monitoring of implementation, and review of identified issues
- 5 Stakeholder and public communication
- 6 Remediation and remedy for affected parties

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1. Establish a Human Rights Policy


The company has established a Human Rights Policy to ensure that all stakeholder groups are treated with responsibility and to prevent any form of human rights violation. The policy covers the following key areas:

- Forced labor
- Child labor
- Treatment of female employees
- Non-discrimination
- Prevention of sexual harassment
- Occupational health, safety, and working environment
- Employee representation
- Human rights of stakeholders

Please refer to the link or QR code below to access the full version of the policy.




<https://www.jaymart.co.th/storage/document/code-of-conduct/human-rights-policy-th.pdf>

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2. Identification of issues and assessment of potential impacts from business operations


- Value Chain



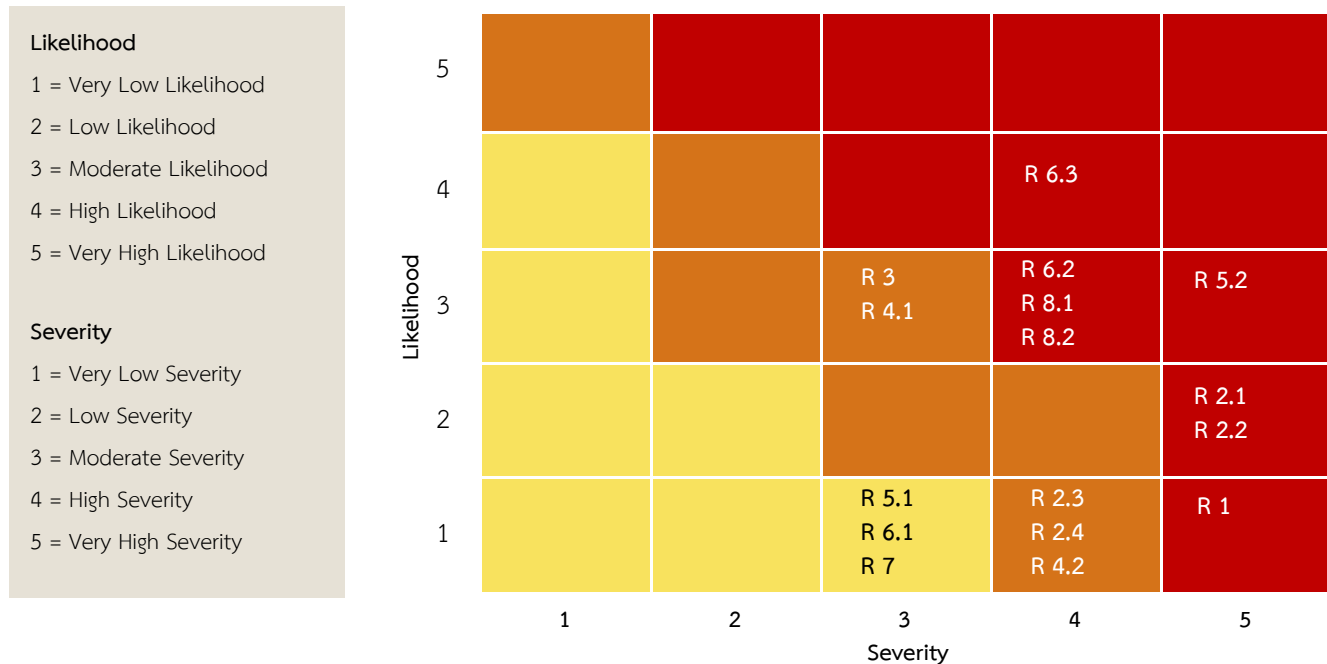
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- Identifying human rights issues across the value chain.


Broad risk issues	Occurred or potential risk events/situations (Issue)
Breach of privacy	Unauthorized use of customers' personal data
Product and service safety	Improper temperature storage of products by branch staff, which damages product quality and poses hazards to users
	Non-standard storage and transportation processes adversely affecting product quality and causing potential harm to users
	Unclear product information or usage instructions leading to customer misunderstanding, which may cause physical or property harm
	Production processes by suppliers not meeting standards, lacking continuous quality control, risking harm to users
Responsible marketing	False advertising where customers receive products or services that do not match the advertisement
Community health and safety	Use of non-standard vehicles causing pollution and noise disturbances to nearby communities and the public
	Supplier factories producing products causing pollution and/or noise disturbances that affect the living conditions of nearby communities
Unfair treatment of customers	Employees practicing discrimination or refusing service to customers
	Customers affected by products or services experiencing delayed responses to their issues and receiving inadequate problem resolution relative to the damage suffered
Safety and occupational health	The company accelerating import and/or production processes with suppliers, creating pressure on employees to work harder, adversely affecting their health
	Unsafe or inadequate working environment, safety, or facilities that harm employee health
	Delivery drivers operating vehicles dangerously, posing risks of harm to people and property
Illegal labor practices	Violation of child labor laws and/or illegal foreign labor use in product manufacturing processes
Labor rights	Employees pressured to work overtime directly or indirectly without consent and without appropriate benefits
	Unequal and discriminatory treatment of employees in the workplace

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● Assessment of the materiality of human rights impact issues




1. Breach of privacy	R 1	Unauthorized use of customers' personal data
2. Product and service safety	R 2.1	Improper storage temperature of products by branch staff
	R 2.2	Non-compliant storage and transportation processes
	R 2.3	Unclear product information or usage instructions
	R 2.4	Supplier's product manufacturing process not meeting standards
3. Responsible marketing	R 3	False advertising, resulting in customers receiving products or services inconsistent with the advertisement
4. Community health and safety	R 4.1	Use of non-compliant vehicles causing pollution and noise disturbance
	R 4.2	Pollution and/or noise disturbance caused by supplier factories
5. Unfair treatment of customers	R 5.1	Discriminatory or avoidant behavior by employees towards customers
	R 5.2	Delayed response in resolving customer issues
6. Safety and occupational health	R 6.1	Accelerated import and/or production processes with suppliers, creating pressure on employees and negatively affecting their health
	R 6.2	Inadequate workplace environment, safety, or facilities for employees' needs
	R 6.3	Reckless driving behavior by delivery drivers
7. Illegal labor practices	R 7	Violation of child labor and/or illegal migrant labor laws by suppliers
8. Labor rights	R 8.1	Employees being pressured to work more, directly or indirectly, without consent
	R 8.2	Unequal or discriminatory treatment of employees in the workplace

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- **Assessment criteria for human rights impact issues**


Level	Definition of Likelihood	Definition of Severity	Scope of Severity
Very Low	No incidents occurred within 1 year	No individuals have been affected	No monetary damage
Low	Incident occurred once within 1 year	No more than 2 individuals have been affected	Monetary damage not exceeding 100,000 Baht
Moderate	Incidents occurred no more than 2 times within 1 year	No more than 4 individuals have been affected	Monetary damage between 100,001 – 300,000 Baht
High	Incidents occurred no more than 3 times within 1 year	No more than 6 individuals have been affected	Monetary damage between 300,001 – 400,000 Baht
Very High	Incidents occurred more than 3 times within 1 year	More than 6 individuals have been affected	Monetary damage exceeding 400,000 Baht

Explanation: The absence of a green zone in the Human Rights Risk Matrix is due to the fact that harm caused to human beings typically results in irreversible damage, making full recovery extremely difficult.


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3. Implementation of preventive and mitigation measures to address potential negative impacts

Identified Actual or Potential Human Rights Risk (Issue)	Measures to Prevent and Mitigate Potential Adverse Impacts
1. Use of customers' personal data without consent.	<ul style="list-style-type: none"> Employees are required to undergo PDPA Awareness training.
2. Improper temperature control by branch staff during product storage may compromise product quality and pose safety risks to users.	<ul style="list-style-type: none"> Branch supervisors shall strictly reinforce compliance with inventory management and product handling procedures as specified in the branch sales and service manual.
3. Failure to adhere to standard procedures in product storage and transportation may compromise product quality and result in potential harm to users.	<ul style="list-style-type: none"> Develop and communicate the Supplier Code of Conduct to business partners at least once a year to reinforce the company's continued emphasis on standards and safety. Conduct partner site visits as appropriate and feasible within the scope of the company's capabilities.
4. Unclear product information or usage instructions may lead to customer misunderstanding, potentially causing harm to persons or property.	<ul style="list-style-type: none"> Develop and communicate the Supplier Code of Conduct to business partners at least once a year to reinforce the company's commitment to standards and safety. Conduct supplier visits as opportunities arise and as appropriate within the scope of the company's capacity.
5. Non-compliance with production standards by partners and a lack of continuous quality control may pose safety risks to users.	<ul style="list-style-type: none"> Develop the Supplier Code of Conduct and communicate it to suppliers at least once a year to emphasize the company's continuous commitment to standards and safety. Conduct supplier visits as opportunities and appropriateness arise, within the scope of the company's capacity.
6. Exaggerated advertising may result in customers receiving products or services that do not match the advertised claims.	<ul style="list-style-type: none"> Require branch staff to attend training on the Business Code of Conduct. Emphasize that the Marketing Department must strictly adhere to the sales and marketing policy.
7. Use of non-standard vehicles may generate pollution and noise that disturbs nearby communities and the public.	<ul style="list-style-type: none"> Develop a Supplier Code of Conduct and communicate with suppliers at least once a year to emphasize the company's continuous commitment to standards and safety.

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Identified Actual or Potential Human Rights Risk (Issue)	Measures to Prevent and Mitigate Potential Adverse Impacts
8. Industrial factories of business partners in the product manufacturing process cause pollution and/or noise disturbance, affecting the livelihood of nearby communities.	<ul style="list-style-type: none"> Develop a Supplier Code of Conduct and communicate with business partners at least once a year to emphasize the company's continuous commitment to standards and safety. Conduct site visits to business partners as appropriate and within the scope that the company is able to carry out.
9. Employees discriminate against or avoid providing services to customers.	<ul style="list-style-type: none"> Require branch staff to attend training on the Business Code of Conduct. Emphasize that branch staff must strictly adhere to the Jaymart Quality Service (JQS) standards. Assign supervisors responsible for branch staff to regularly visit and inspect the branches under their supervision.
10. Customer complaints related to the company's products or services receive delayed responses and inadequate resolutions compared to the actual damage experienced by customers.	<ul style="list-style-type: none"> Require employees at all levels to regularly attend training on the Business Code of Conduct. Require all parties involved in the remediation and/or grievance process to strictly perform their duties and responsibilities.
11. The company expedites the import process and/or the product manufacturing process with partners, putting pressure on employees to work harder, which negatively affects their health.	<ul style="list-style-type: none"> Instill the Human Rights Policy in employees and require departments involved in supplier operations to attend training on the Business Code of Conduct.
12. The working environment, safety, or facilities are below standard and/or insufficient, leading to negative impacts on employees' health.	<ul style="list-style-type: none"> Allocate and ensure safety and occupational health in accordance with the rights employees are entitled to. Conduct an employee satisfaction survey at least once a year to understand their actual needs and concerns.
13. Delivery staff drive vehicles dangerously, posing risks to life and property.	<ul style="list-style-type: none"> Emphasize safe driving practices to employees and consider appropriate disciplinary actions to prevent recurrence of incidents.
14. Child labor and/or illegal migrant labor is used in the product manufacturing process, violating labor laws.	<ul style="list-style-type: none"> Develop a Supplier Code of Conduct and communicate it to suppliers at least once a year. Conduct supplier visits as opportunities arise and as appropriate within the company's operational capacity. Conduct self-assessments of key suppliers at least once a year.

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Identified Actual or Potential Human Rights Risk (Issue)	Measures to Prevent and Mitigate Potential Adverse Impacts
15. Employees are pressured to work longer hours or take on additional tasks, directly or indirectly, without their consent and without receiving appropriate benefits.	<ul style="list-style-type: none"> ● Instill the Human Rights Policy to executives and employees through policies, training, and internal activities.
16. Unequal and discriminatory treatment of employees in the workplace.	<ul style="list-style-type: none"> ● Instill the Human Rights Policy to executives and employees.

4. Auditing, monitoring of implementation, and review of identified issues

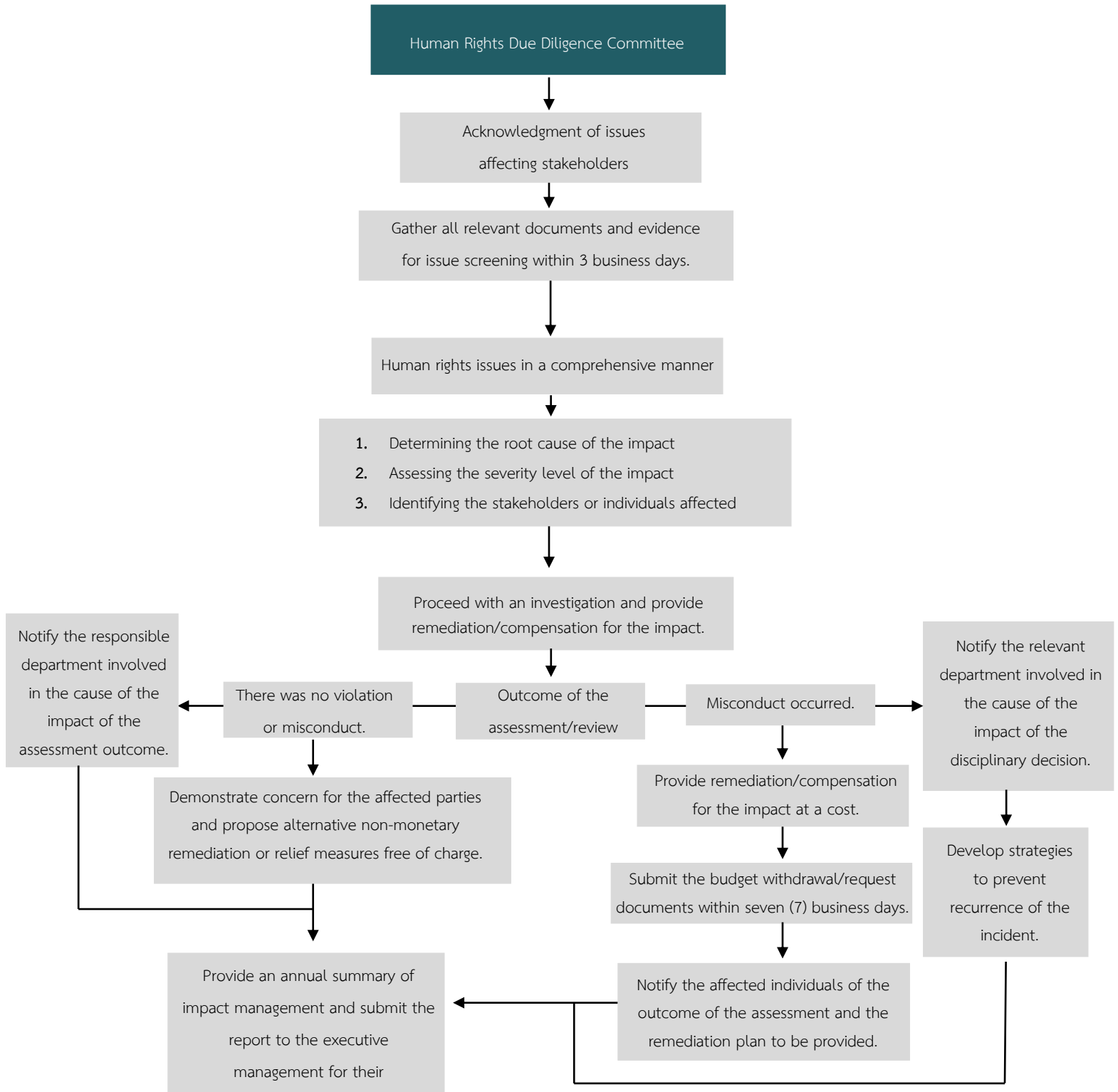
- 4.1. The department responsible for handling complaints shall monitor reported incidents from all channels and compile data to carry out comprehensive remediation and grievance processes related to human rights due diligence (HRDD).
- 4.2. The management department is required to review the Human Rights Policy at least once a year.
- 4.3. The management department is required to conduct self-assessments of key suppliers at least once a year.
- 4.4. The management department is required to conduct a comprehensive human rights due diligence (HRDD) assessment once a year.


5. Stakeholder and public communication

- 5.1. The company discloses statistics on human rights complaints in its annual report (56-1 One Report) and sustainability report (SD Report), which are published on the company's website to ensure easy access for stakeholders.
- 5.2. The company publishes the following policies on its website to assure stakeholders of its commitment to responsible and comprehensive human rights due diligence (HRDD) management:
 - 5.2.1. Human Rights Policy
 - 5.2.2. Code of Conduct
 - 5.2.3. Supplier Code of Conduct
 - 5.2.4. Human Rights Due Diligence (HRDD)

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6. Remediation and remedy for affected parties

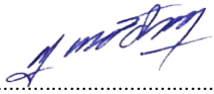


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Schedule for reviewing audit issues

Assign the responsible department to conduct a comprehensive Human Rights Due Diligence (HRDD) review, ensuring that each issue is regularly updated to reflect current circumstances every two years, or whenever an urgent review is necessary. The findings shall be submitted for approval to the company's board of directors.


The policy shall be effective from November 11,2024 onwards.



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The approver of the Human Rights Due Diligence

Mr. Pisnu Pong-Acha
Chairman of the Board of Directors

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Records of Revision

Revision No.	Responsible Department	Date of Review	Effective Date	Description of Revision
REV00	Investor Relations	At the 2/2567 Board of Directors meeting held on May 15, 2024.	May 17,2024	Perform the initial comprehensive Human Rights Due Diligence (HRDD).
REV01	Investor Relations	At the 6/2567 Board of Directors meeting held on November 8, 2024.	November 11,2024	<ol style="list-style-type: none"> (Revise) The method for identifying human rights issues originating from the organization's value chain (pages 6–8) (Revise) The criteria for assessing human rights impact issues (page 9) (Revise) Preventive measures and mitigation of potential negative impacts aligned with the identified issues (pages 10–12)