

Human Rights Due Diligence 2023 Report

CENTEL

Focuses on operating a business that is not related to human rights violations of any kind and adheres to the human rights principles under the human rights framework that respect human dignity and equality according to the law, the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at work without discrimination against race, religion, gender, skin color, language, ethnicity, or any other status, and the labor laws of the countries where the company operates, which cover human rights issues such as child labor, forced labor, discrimination, and sexual harassment.

In addition, CENTEL has taken steps to promote equality and eliminate unfair treatment between genders. For example, job postings and job qualifications do not mention gender identity or sexual orientation to provide opportunities for recruitment of male and female applicants for all job positions. CENTEL focuses on preventing and resolving sexual harassment in the workplace by providing guidelines on sexual harassment in the workplace for employees.

CENTEL also raises awareness about human rights respect and practices among employees and suppliers to prevent human rights violations to all stakeholders by providing training on human rights with other businesses and on basic human rights for employees.



The human rights risk assessment covers all (100%) of the activities in the CENTEL Operation (Hotel & Food business).



The human rights risk assessment covers 36% and 24 % of the 1st Tier suppliers of the Hotel and Food business respectively participating in the human rights risk assessment in the supply chain. There are 52 respondents out of 184 from 237 suppliers in the 1st Tier that we invited



SCOPE

This report elaborates on the human rights risk assessment result for the CENTEL operation (Hotel & Food business) and supply chain in Thailand.

The human rights risk in the **operation** is assessed by conducting the human rights risk assessment exercise considering the **impact and likelihood** criteria applied for the human rights risks, and subsequently, identify the current mitigation control and monitoring.



METHODOLOGY

The human rights assessment is conducted by the personnel/function who is responsible to each risk item.

The human rights risk assessment for the **supply chain** was conducted through questionnaires. The selected suppliers responded to the questionnaires after the clarification session. The result from the questionnaire will be taken into consideration of CHR's human rights risk assessment process.

HUMAN RIGHTS DUE DILIGENCE FRAMEWORK



- **Human Rights Policy Commitment**

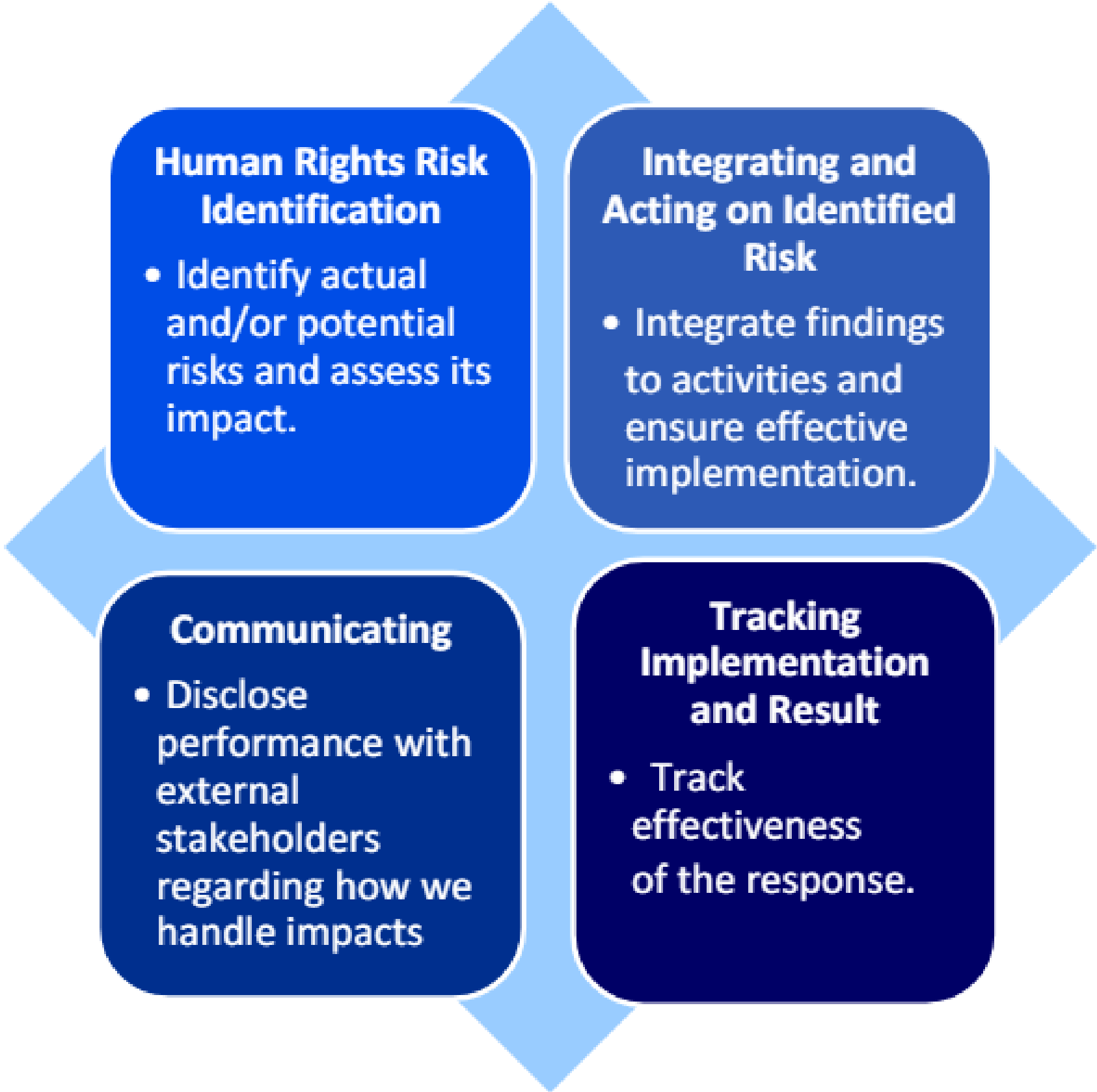
Announce Human Rights Policy to explain how the Company respects human rights



- **Embedding the Responsibility**

Embed Human Rights policy into management systems and oversight bodies





- **Grievance Mechanisms & Remediation**

Set up contact points for receiving report and develop process to investigate.



1. POLICY COMMITMENT

Human Right Policy Commitment

Preface and document control

This document is intended to provide information in respect of Central Plaza Hotel Public Company Limited policy, procedure, standards and guidance and will be periodically updated to reflect any changes due to business requirements or infrastructure. Neither all nor part of this document shall be reproduced or released for commercial purposes by a recipient without the expressed consent of the stated document owner. This document MUST be reviewed and approved by the designated approver(s) to ensure technical accuracy and business validity.

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5. Human Rights Policy

5.1 Adopting the 2008 UN Framework – “Protect, Respect & Remedy”

The company is committed to operate by the guiding principles of the UN framework for business and human rights with its particular emphasis on the state’s duty to protect human rights, the Company’s responsibility to respect human rights, and the shared responsibility of the State and the Company to ensure access to effective remedy for people who have experienced business-related human rights abuse.

All persons have equal human value and dignity. The Company places importance on respecting human rights in all activities of the Company. All directors, executives and employees must jointly promote corporate values and culture that respect human rights by upholding and complying with the following policies:

Embedding Responsibility

CENTEL commits to respecting human rights throughout its supply chain by implementing human rights policies since 2022. These policies aim to prevent human trafficking, forced labor, child labor, discrimination, and promote equal opportunity, aligning with international frameworks, UNGPs.

They’re all integrated into all company activities and management systems, ensuring coherence with existing policies and promoting compliance among business partners and entities in the value chain.

CENTEL implements a comprehensive human rights policy for all stakeholders, including employees, customers, suppliers, and communities, ensuring fair treatment and non-discrimination across various aspects like child protection, disability, and gender.

Measures include job posting without gender specifications, guidelines on treating solo female guests for safety, and addressing sexual harassment in the workplace.

Additionally, CENTEL conducts training to promote awareness and prevent human rights violations among employees and suppliers.



Full policy and practices regarding human rights is available [here](#)

POLICY COMMITMENT

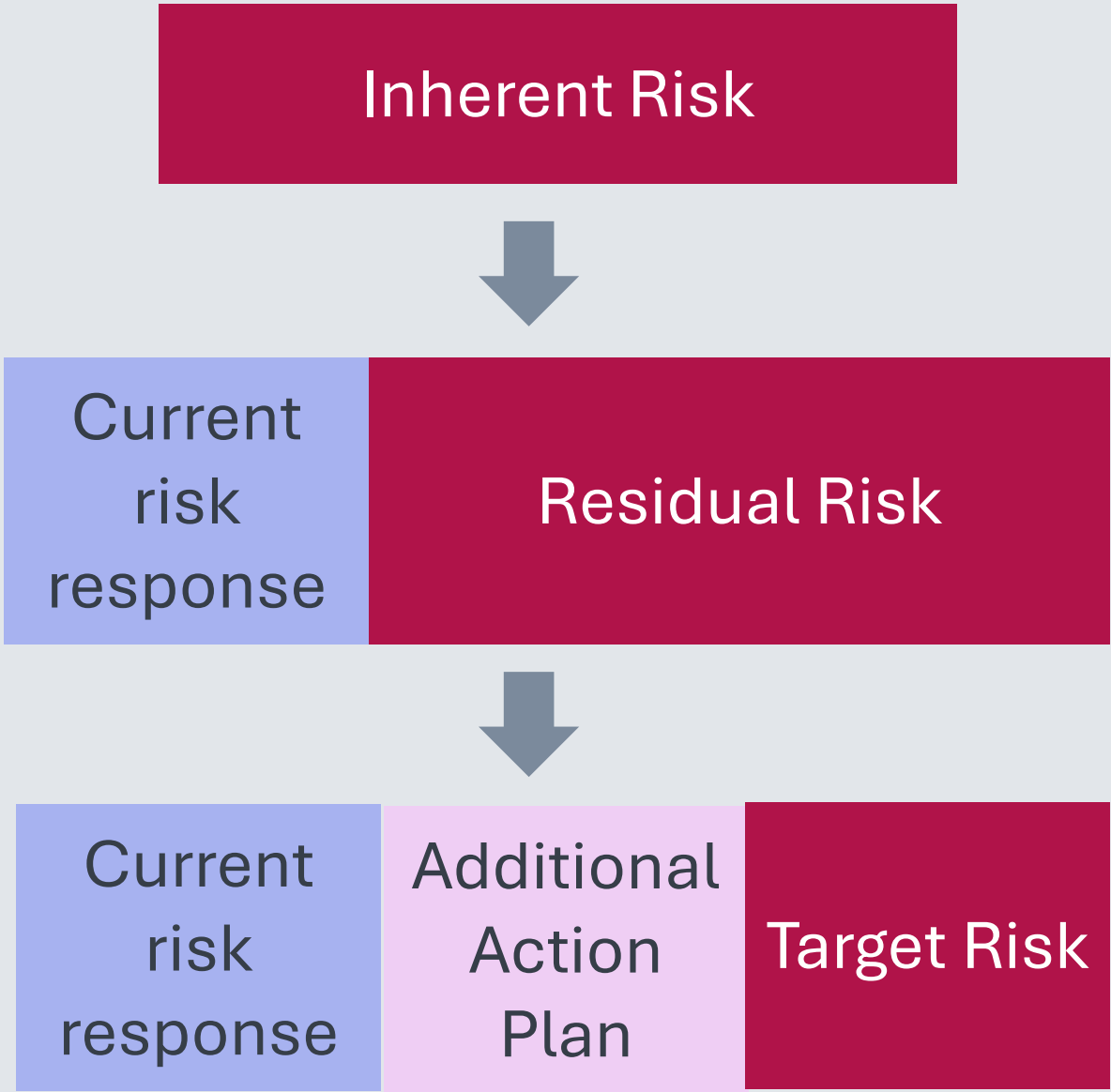
HUMAN RIGHTS DUE DILIGENCE

ACCESS TO REMEDY

- 1. Conduct desktop review from peers and media.
- 2. Discuss among the teams to identify human rights risk
- 3. Conduct stakeholder engagement to receive complaints or concerns
- 4. Identify risks from grievance mechanism
- 5. Distribute survey among the suppliers to identify key human rights issues in the supply chain.

EXAMPLE OF MASTER LISTS

HOTEL	FOOD
Forced labor, Child labor, Working condition, Labor practice, Discrimination, Freedom of association and collective bargaining, Freedom of expression, Environmental and Community Rights, Access to Remedy, Cyber Security and Data Privacy	



The impact identification and risk prioritization process can help to ensure that the efforts and resources are appropriately allocated among those prioritized risks

- 1. Summarizing based on the appropriate qualitative and quantitative indicator
- 2. Drawing on feedback from both internal and external sources affected stakeholders.
- 3. Integrating the monitoring and evaluation in the relevant internal and external evaluation/assessment processes (e.g., staff surveys, audits, supplier site visits or self-assessment)

How impacts are addressed

Besides tracking performance, the Company communicates internally and externally to account for the approach and action taken to identify human rights risks.

Conduct engagement with internal and external stakeholders such as employees, business partners, local communities and societies, civil society organizations and governmental agencies to communicate the Company's human rights performance.

The Company's actions and efforts to respect human rights will be perceived and increase dialogue between stakeholders.

The human rights performance disclosure is a part of the sustainable development. The annual report (56-1 One Report and/or Sustainability Report) and the Company's website or other appropriate channels are general approaches and encouraged

Identification

Integrating and Acting on Identified Risk

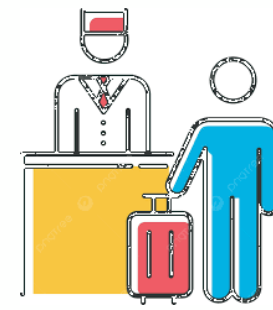
Tracking Communication and Results

Communicating



Assessing Human Rights in

CENTEL'S OPERATION



Assessing Human Rights in

CENTEL'S SUPPLY CHAIN

Identify Human Right Risks



- Right to access to effective remedy.
- Right to freedom of association and collective bargaining.
- Right to enjoy just and favorable conditions of work (with no discrimination and equal remuneration).
- Right not to be subjected to slavery, servitude or forced labor.

Assess Human Right Risks



- Right to access to effective remedy.
- Right to freedom of association and collective bargaining.

Identify Additional Measures and Monitoring Process



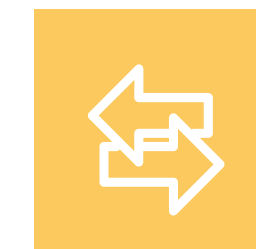
- Identify additional measures from the residual risk level.
- Identify responsible person and timeframe for monitoring.

Identify the List of Human Right Issues



- Identify the human rights issues across CENTEL's supply chain.
 - Right to access to effective remedy.
 - Right not to be subjected to slavery, servitude or forced labor.
 - Right to privacy.

Conduct Survey



- Assess human rights risk with suppliers in the supply chain through a survey.

Analyze the Data from Survey



- Prioritize of the huma rights issue identified.
- Analyze and integrate the survey results.

IMPACT AND LIKELIHOOD

Impact Criteria

Level	Impact Criteria						
	Scale					Scope	Irremediable
	Health and Safety	Legal Compliance	Reputation	Business Continuity	Environment & Community		
5 Disastrous	Death or disable	The Company's license would be cancelled	Negative news in the public media and the Company loses trust from the stakeholders or listed as a prohibit company	Business interruption more than 3 days	Serious and extensive detrimental impact on environment and/or community and/or public health, significant discharge, pollutant, source of community annoyance	Impact to all stakeholder groups	Take more than 4 years to recover (> 4 years)
4 Significant	Require IPD for and more than 3 days	The Company is examined by the regulator/authority and pointed out the guilty and/or penalized.	Negative news in public media and takes 3 – 4 days to restore the reputation.	Business Interruption within 1 - 3 day	Long-term detrimental impact on environment and/or community e.g., chronic and/or significant discharge, pollutant, possible source of community annoyance	Impact to more than 3 groups of stakeholder	3 – 4 years to recover
3 Significant but Containable	Require IPD but less than 3 days	The Company may be asked to clarify to the regulator/authority.	The Company may need to clarify the incident and the reputation can be restore within 48 hours.	Business Interruption within 12 hours.	Notable impact on environment and/or community, and require corrective measure/activity	Impact to 2 to 3 groups of stakeholder	2 – 3 years to recover
2 Minor	Require OPD	No issue with legal compliance but may be unethical.	Receiving complaint from stakeholder, but the impact to the reputation is minor.	Minor impact on the operation but can operate business as usual	Minor impact on environment and/or community, and do not need corrective measure/activity	Impact to more than 1 individual in 1 group of stakeholder	Take 1 – 2 years to recover
1 Negligible	Require first-aid	Insignificant and does not breach the law	Negligible impact to the Company's reputation.	Insignificant impact on the operation	Insignificant/ no lasting impact on environment and/or community	Impact to an individual in 1 group of stakeholders.	Take less than a year to recover (< 1 year)

Likelihood Criteria

Level	Likelihood Criteria	
	Possibility	Frequency
5 Probable	<ul style="list-style-type: none">Possibility > 75% orIt happens very easily without control measure.	12 times a year
4 Highly Possible	<ul style="list-style-type: none">Possibility 51 – 75% orThere is a high chance that there are no control measure or insufficient control measure or lack of consistent and continuous implementation.	5 – 12 times a year
3 Possible	<ul style="list-style-type: none">Possibility 26 – 50% orThere is a chance that there are no control measures or insufficient control measures or lack of consistent and continuous implementation.	3 – 4 times a year
2 Unlikely	<ul style="list-style-type: none">Possibility 10 – 25% orIt is difficult even without control measure	2 times a year
1 Very Unlikely	<ul style="list-style-type: none">Possibility < 10% orIt is very difficult even without control measure	1 time a year

Likelihood Criteria

The risk level is divided into five levels which can be display as Risk Profile.

Likelihood	Impact				
	1	2	3	4	5
5	(5)	(10)	(15)	(20)	(25)
4	(4)	(8)	(12)	(16)	(20)
3	(3)	(6)	(9)	(12)	(15)
2	(2)	(4)	(6)	(8)	(10)
1	(1)	(2)	(3)	(4)	(5)

Risk Appetite

- The Company’s impacts assessment have considered based on
- 1. **Scale** : how serious the harm is.
 - Impacts on the right to life or the health and safety.
 - 2. **Scope** : how widespread the harm is.
 - The number of stakeholders that will be affected.
 - 3. **Irremediable** : if the harm occurs, can it be put right.
 - Limitations on the ability to restore those affected to a situation at least the same as or equivalent to, their situation before the impact.

HUMAN RIGHTS RISK

The scope of this human rights risk assessment covers all business activities under the operation of CENTEL in Thailand, human rights risks identified applied to the hotel and food business.

There are 27 and 31 human rights risks identified by the hotel business and food business-related personnel during the human rights risk assessment exercise.

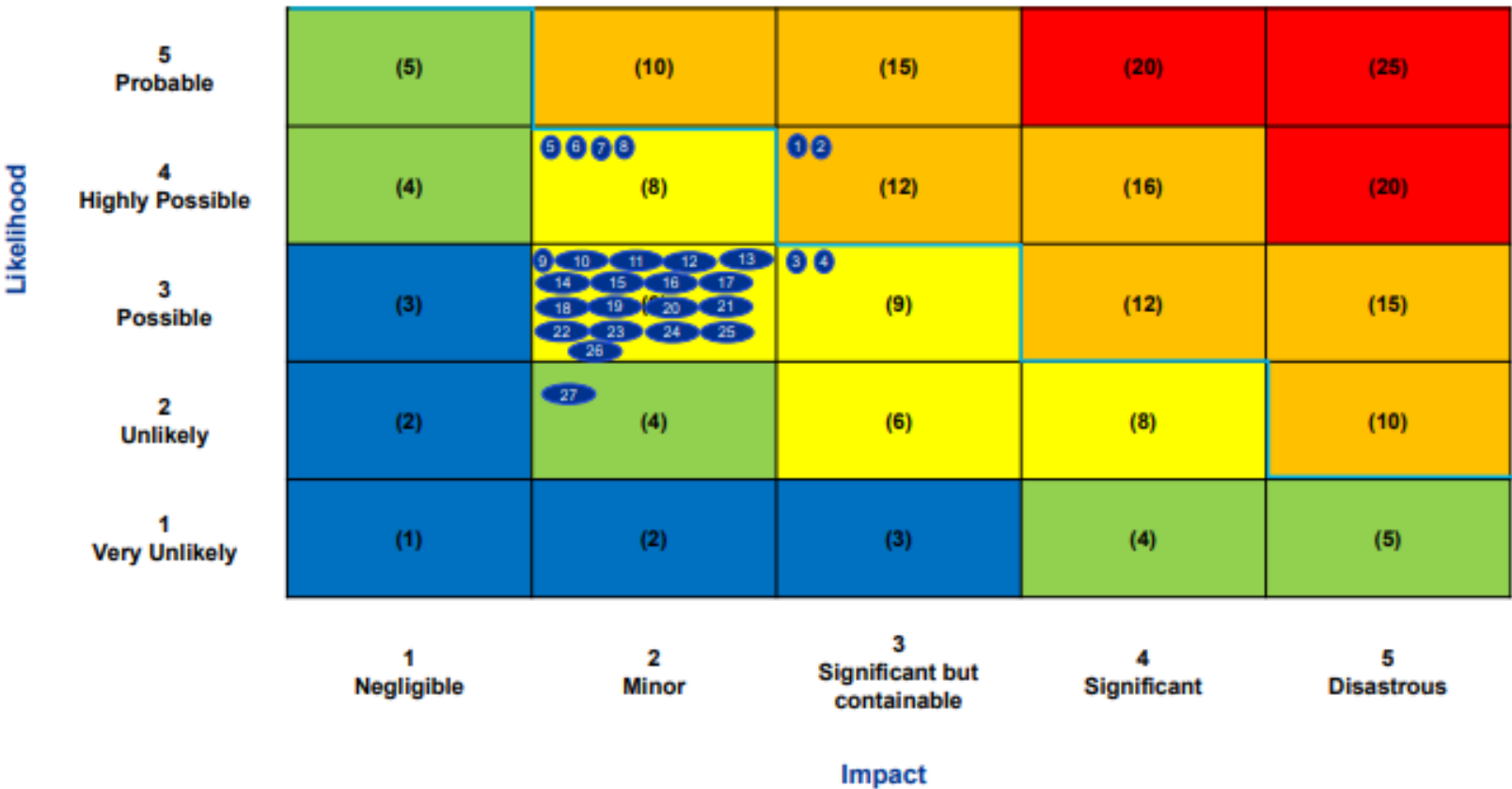
All of the human rights risks, after the current control, are under CENTEL’s risk appetite and majority of the risks are under the insignificant level which hotel and food business could accept those human rights risks as it is.

Inherent Risk		Residual Risk	
Extreme	0	Extreme	0
High	2	High	0
Medium	24	Medium	3
Low	1	Low	7
Insignificant	0	Insignificant	17

Inherent risk level

Residual risk level

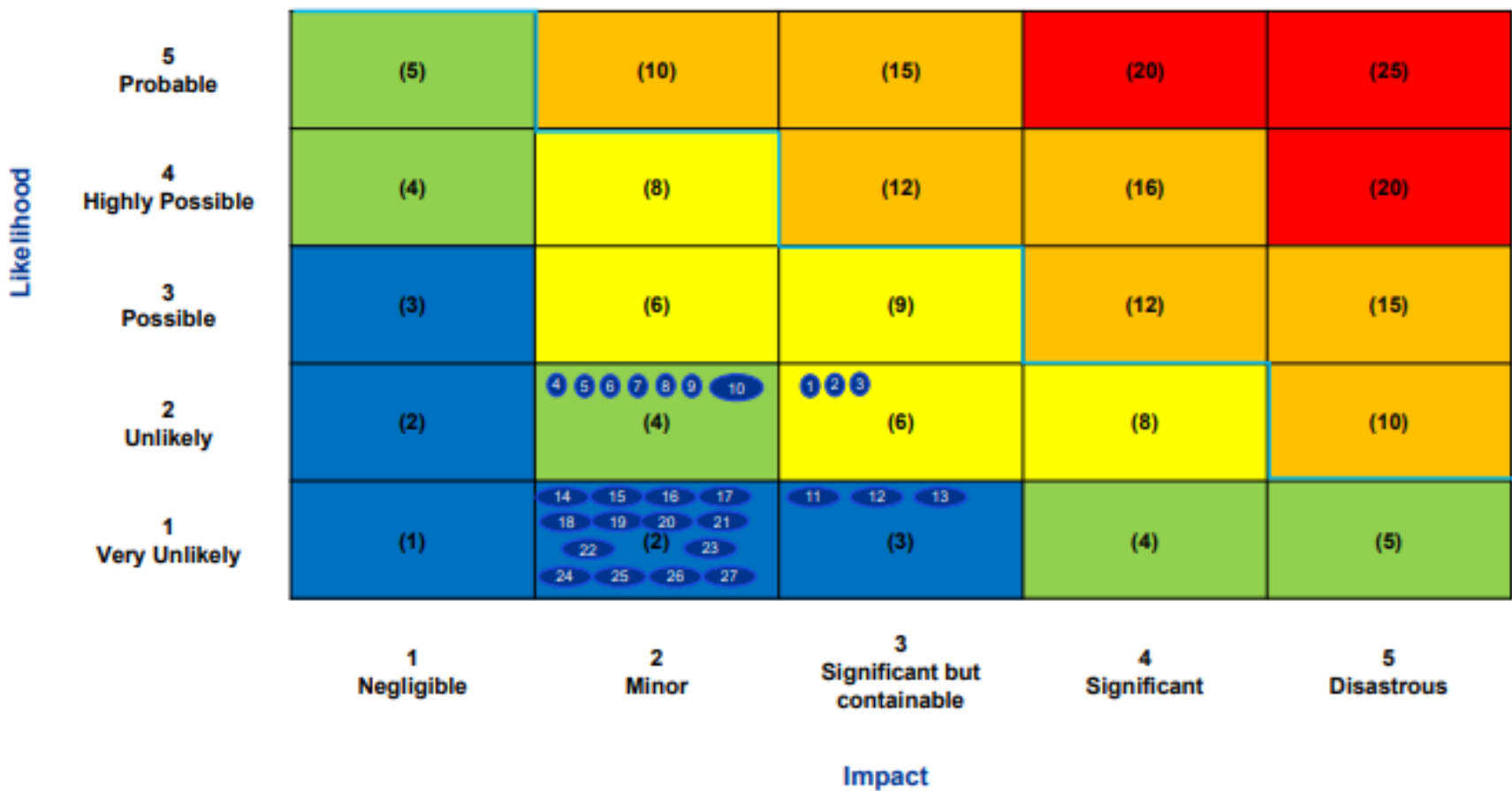
Human Rights Risks: Inherent Risk Level



- 1 Access to Remedy: The Company targets individuals who report violation related to the operation.
- 2 Access to Remedy: The internal grievance mechanisms are not effective

Risk Appetite

Human Rights Risks: Residual Risk Level



- 1 Access to Remedy: The Company targets individuals who report violation related to the operation.
- 2 Access to Remedy: The internal grievance mechanisms are not effective
- 3 Digital Security/Privacy: Personal information of the customer is leaked to the third parties.

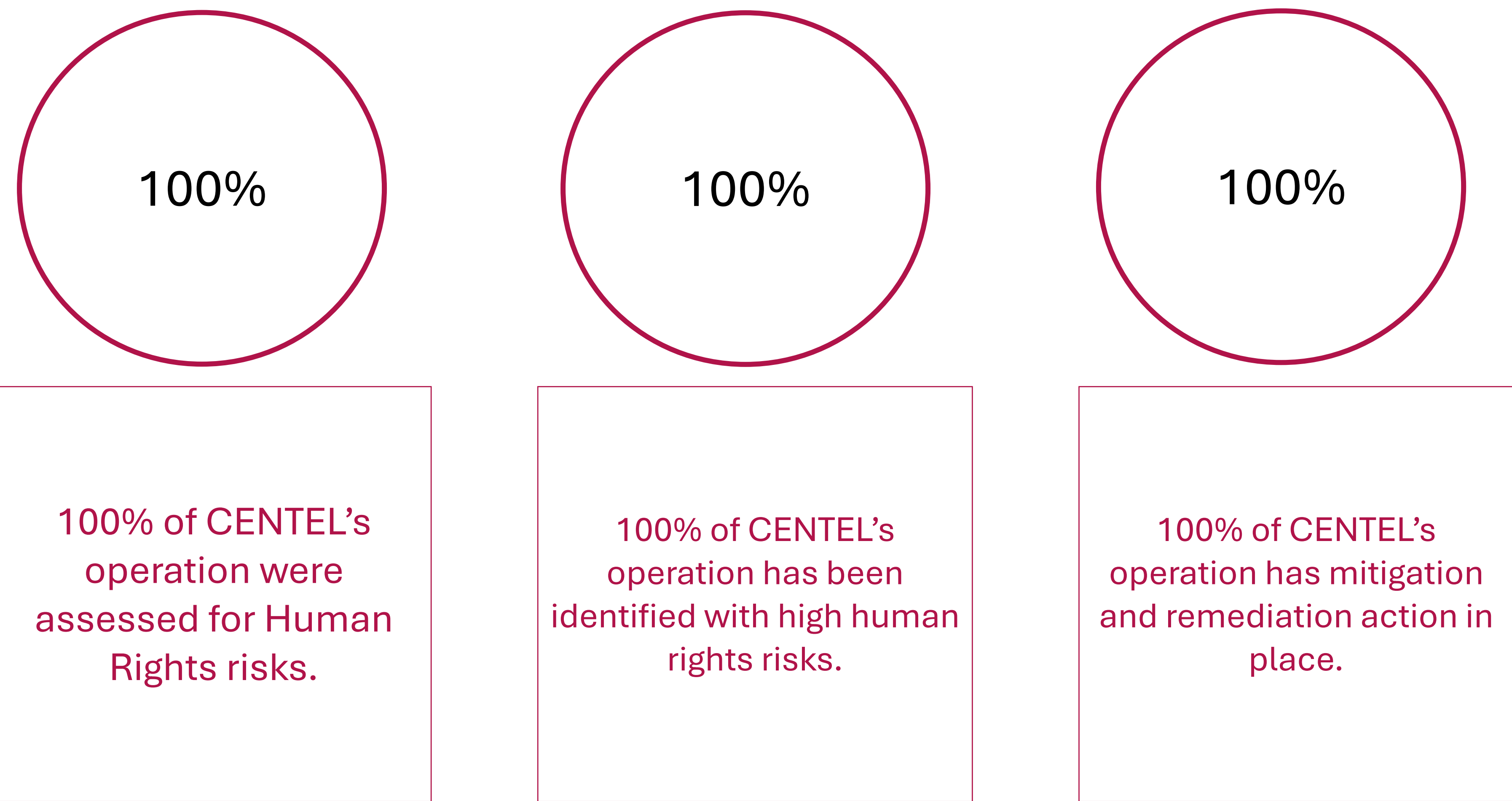
Risk Appetite

HUMAN RIGHTS RISK IN SUPPLY CHAIN

(THAILAND’S TOP 10 HUMAN RIGHTS RISK IN SUPPLY CHAIN)
BASED ON THE QUESTIONNAIRE’S RESULT

Rank	Issue	Frequency	Level
1	Access to Remedy: The Company does not have internal grievance mechanisms in place for employee to report issue	33%	Medium
	Digital Security/Privacy: Personal information of customer leaks to third parties	33%	Medium
2	Working Conditions: The working conditions are detrimental to the physical, mental and emotional well-being of children	29%	Medium
3	Labour Practices: Employee, migrant workers in particular, is not provided with written employment contract	29%	Medium
4	Labour Practices: Migrant workers do not receive benefits or services or enjoy their rights as required by law and standards	29%	Medium
5	Working Conditions: The living conditions provided for employee are substandard quality.	29%	Medium
6	Working Conditions: Employee cannot be responsible for childcare during working hours	29%	Medium
7	Working Conditions: Employee has health issues as a result of long working hours	29%	Medium
8	Working Conditions: The workplace environment is lack of security	29%	Medium
9	Working Conditions: Working environment is stressful	29%	Medium
10	Access to Remedy: The grievance mechanisms are not effective	29%	Medium

HUMAN RIGHT RISKS IN CENTEL OPERATION



HUMAN RIGHT RISKS IN SUPPLY CHAIN



SALIENT RISK MITIGATION

Salient Risk	Mitigation Actions
<p>1. Right to access to effective remedy :</p> <p>Risk due to inability to provide fairness and protection to whistleblowers who report human rights violations and ineffective grievance mechanisms as lack of safeguard measures and inefficient process.</p>	<ul style="list-style-type: none">• The Company’s rules and regulation on receiving complaints and personnel responsible for grievance mechanisms which include risk management, legal, and internal audit department.• Safeguard measures for whistleblower and informant.• Inform the details of grievance channels through email, announcement board, and orientation for new employees.• Communicate Supplier Code of Conduct to all suppliers and require acknowledgement and compliance.
<p>2. Right to privacy:</p> <p>Risk due to the leak of personal information and personal information being used for secondary purposes without consent from information owners.</p>	<ul style="list-style-type: none">• Cyber security and digital privacy workplan (approved by CEO)• Quarterly report on cyber security and digital privacy• Awareness training on privacy protection and PDPA policy.• Communicate Supplier Code of Conduct to all suppliers and require acknowledgement and compliance.

TRACKING AND COMMUNICATION

CENTEL regularly monitors, reviews, and assesses risks and impacts on human rights, formulating appropriate risk management measures. Each department is responsible for managing risks under its own responsibility, as well as encouraging business partners and alliances to assess their operation results to ensure there are no violations of human rights risks. Moreover, CENTEL requires relevant authorities to monitor cases of human rights violations, collect and prepare reports to resolve further issues and report to the Risk Management and Corporate Governance Committee and the Board of Directors, respectively.



Grievance Mechanism:

1. [Whistleblowing](#)

2. Internal Audit and Risk Management, Email: whistleblower_centel@chr.co.th

Postal Address: Internal Audit and Risk Management

Centara Plaza Hotel Public Company Limited, 999/99 25th floor
Rama 1 Road, Pathumwan District, Pathumwan, Bangkok 10330

3. Corporate Secretary Office, Email: co.secretary_centel@chr.co.th

Postal Address: Corporate Secretary Office

Central Plaza Hotel Public Company Limited, 999/99 Rama 1 Road,
Pathumwan Sub-District, Pathumwan District, Bangkok 10330.

REMEDY ACTION IN 2023

In case of human rights violation, CENTEL provides remedy action by considering the risk and impact level to the highly affected group as top priority, including those affected by the activities unmanageable if not tackled immediately, followed by other affected groups.

Remedies are determined by the priority and severity of the impact. Remedy actions include, but are not limited to, apology, restitution, financial and non-financial compensation, assistance to access public remedy, as well as other relevant forms of remediation action.

In 2023, there was no complaints regarding human rights violation in CENTEL and across its supply chain, thus, there was no remediation action taken in any forms (i.e. publicly official apologies, financial or non-financial compensation, persuading the associated third party to remedy affected persons).

