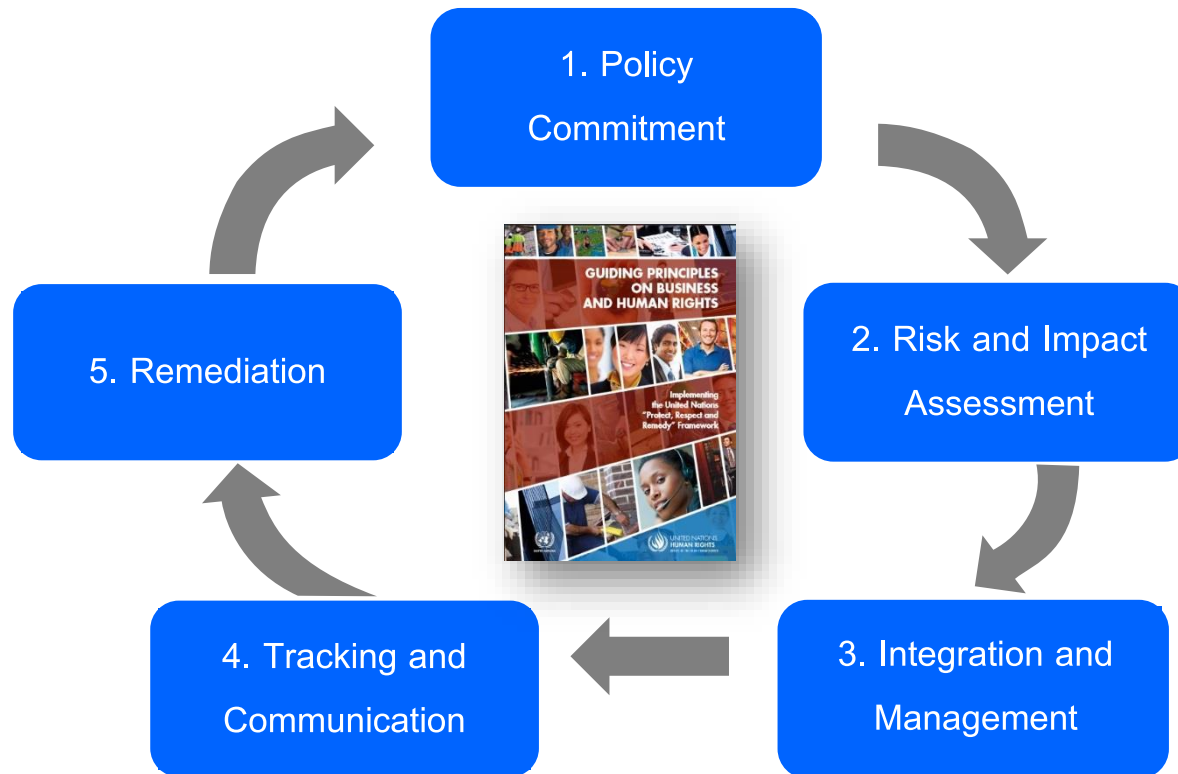


Human Rights Due Diligence Summary Report 2025



Human Rights Due Diligence

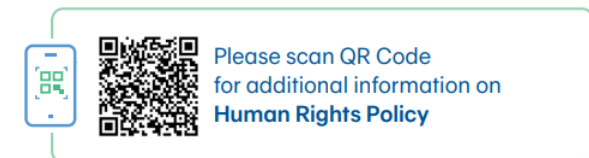
Bangkok Bank Public Company Limited (BBL) is committed to respecting the human rights of all stakeholders in BBL's own operations and business activities, and avoiding any contribution to adverse human rights impacts that occur through our value chain and joint ventures*. By doing so, BBL has systematically conducted and reviewed Human Rights Due Diligence (HRDD) process every 3 years to identify, assess, prevent and mitigate human rights risks across the entire value chain of the business. The HRDD process includes 5 following steps, which are implemented and developed in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs).



**Note: BBL's joint ventures refer to the companies that Bangkok Bank Public Company Limited invest above 10 percent.*

1. Policy Commitment

- Approved by the Board the Director, BBL's Human Rights Policy was established in accordance with national laws and regulations, and international standards, which include the Universal Declaration of Human Rights (UDHR), the UN Guiding Principles on Business and Human Rights (UNGPR), the fundamental Conventions of the International Labour Organization (ILO Conventions), and the Children's Rights and Business Principles (CRBP).
- The policy covers the commitment toward conducting business with respect to human rights principles, and expectation and guidelines on human rights protection for stakeholders such as customers, employees, suppliers and business partners. In addition, BBL commits to respecting human rights in terms of freedom of association, collective bargaining and equal remuneration, as well as to preventing human right risks such as human trafficking, forced labour, child labour, discrimination and harassment, data privacy and security, health and safety, working conditions and market conduct practices.
- Communication and training on human rights are regularly arranged to create organization-wide awareness and understanding, and to prevent all forms of human rights violation. These include providing reporting or whistleblowing channels, as well as report handling procedures for all levels of employees.
- Environmental, social and governance related issues, including human rights, are overseen by Corporate Governance Committee.



2. Risk and Impact Assessment

As part of human rights due diligence process, BBL conducted human rights risk assessment to identify and assess salient risks, and to design prevention and mitigation measures throughout our business activities and operations as well as activities of our value chain. The risk assessment process is as follows:

1

Risk Identification

- Identify actual and potential human rights issues related to both BBL's business activities and operations as well as activities of our suppliers and customers, e.g., forced labour, human trafficking, child labour, land rights, community rights, freedom of association, right to collective bargaining, equal remuneration, discrimination and harassment, data breaches, money laundering including mule accounts, health and safety, working conditions and market conduct practices.
- Consider possibly affected groups and vulnerable groups, e.g., women, children, indigenous people, migrant workers, daily wage workers, third-party contracted workers, local communities, disabled persons, pregnant women, elderly, LGBTQIA+, customers and own employees.

2

Inherent Risk Assessment

- Conduct human rights inherent risks assessment, not considering the existing mitigation measures/controls.
- Rank inherent risks based on severity and likelihood levels.

3

Mitigation Measure Identification

- Identify existing mitigation measures/controls and analyze how they can handle the inherent risks.

4

Residual Risk Assessment and Further Actions

- Conduct human rights residual risks assessment with relevant stakeholders and human rights expert, as well as taking into account the existing mitigation measures/controls.
- Rank residual risks based on severity and likelihood levels.
- Prioritize human rights salient issues and review these salient issues with external human rights experts.
- Develop additional mitigation measures to reduce human rights salient risks.

2. Risk and Impact Assessment

Identification of Risk Issues Related to Customers and Lending



Online Retail Banking (Non-branch)

- Customer data breaches
- Discrimination against customers
- Money laundering including mule accounts



Offline Retail Banking including Wealth Management

- Customer data breaches
- Market misconduct and mis-selling
- Money laundering including mule accounts
- Discrimination against customers
- Health and safety



Corporate Lending

- Human trafficking, forced labour, child labour
- Labour working conditions (pay, working hours, rest periods)
- Labour health and safety
- Land rights
- Community rights
- Market misconduct and mis-selling



Project Finance

- Human trafficking, forced labour, child labour
- Labour working conditions (pay, working hours, rest periods)
- Labour health and safety
- Land rights
- Community rights

2. Risk and Impact Assessment

Identification of Risk Issues Related to Employees and Suppliers



Employees

- Working conditions (pay, working hours, rest periods)
- Discrimination and harassment
- Employee data privacy
- Freedom of association, assembly, and collective bargaining
- Health and safety



Suppliers

- Human trafficking, forced labour, child labour
- Labour working conditions (pay, working hours, rest periods)
- Discrimination in selection process
- Freedom of association, assembly, and collective bargaining
- Labour health and safety
- Community rights

2. Risk and Impact Assessment

Identification of Risk Issues Related to Joint Ventures (including stakes above 10%)



Joint Ventures (including stakes above 10%)

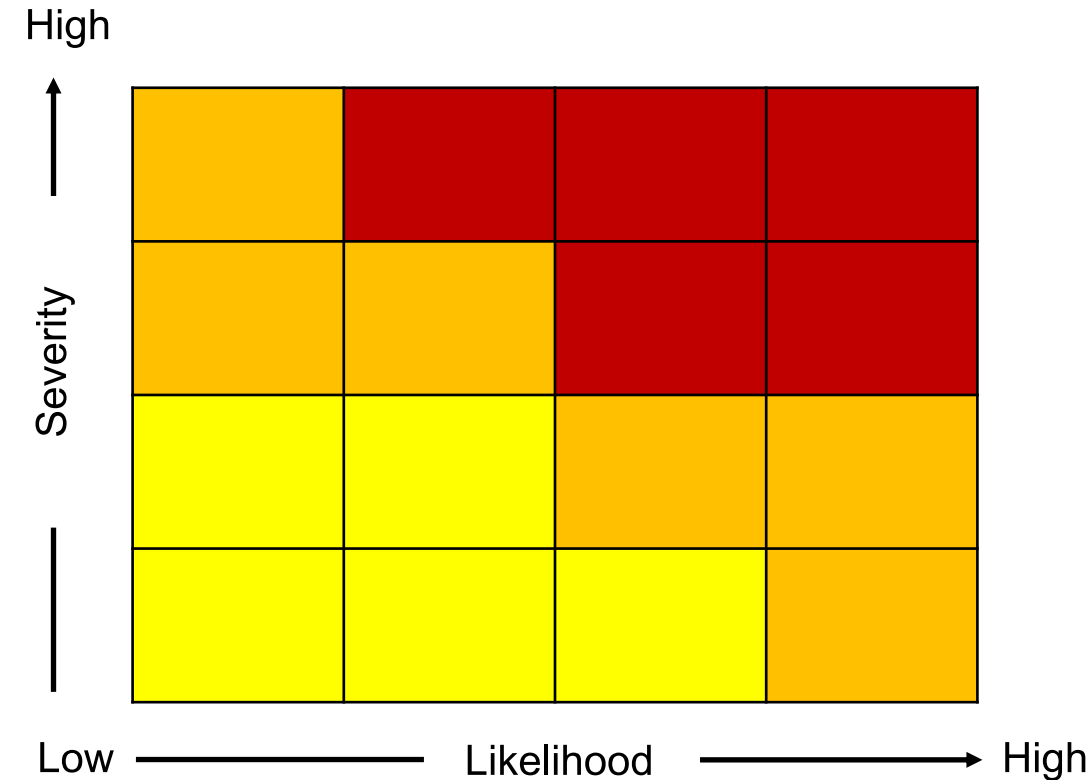
- Customer data breaches
- Employee data privacy
- Community rights and land rights
- Discrimination and harassment
- Working conditions
- Health and safety
- Financing technologies and innovation that cause human rights abuses
- Unsafe products
- Investing in companies that cause adverse environmental or social impacts, and human rights violation

2. Risk and Impact Assessment

Inherent Risk Assessment, Residual Risk Assessment, and Mitigation Measures

- The risk assessment was conducted based on a 4x4 human rights risk matrix, considering **severity of impacts** and **likelihood of events**.
- The assessment takes into account right holders and vulnerable groups, including women, children, indigenous people, migrant workers, daily wage workers, third-party contracted workers, local communities, disabled persons, pregnant women, elderly, LGBTQIA+, customers and our own employees.
- Risk levels are categorized into three groups: high, moderate, and low.

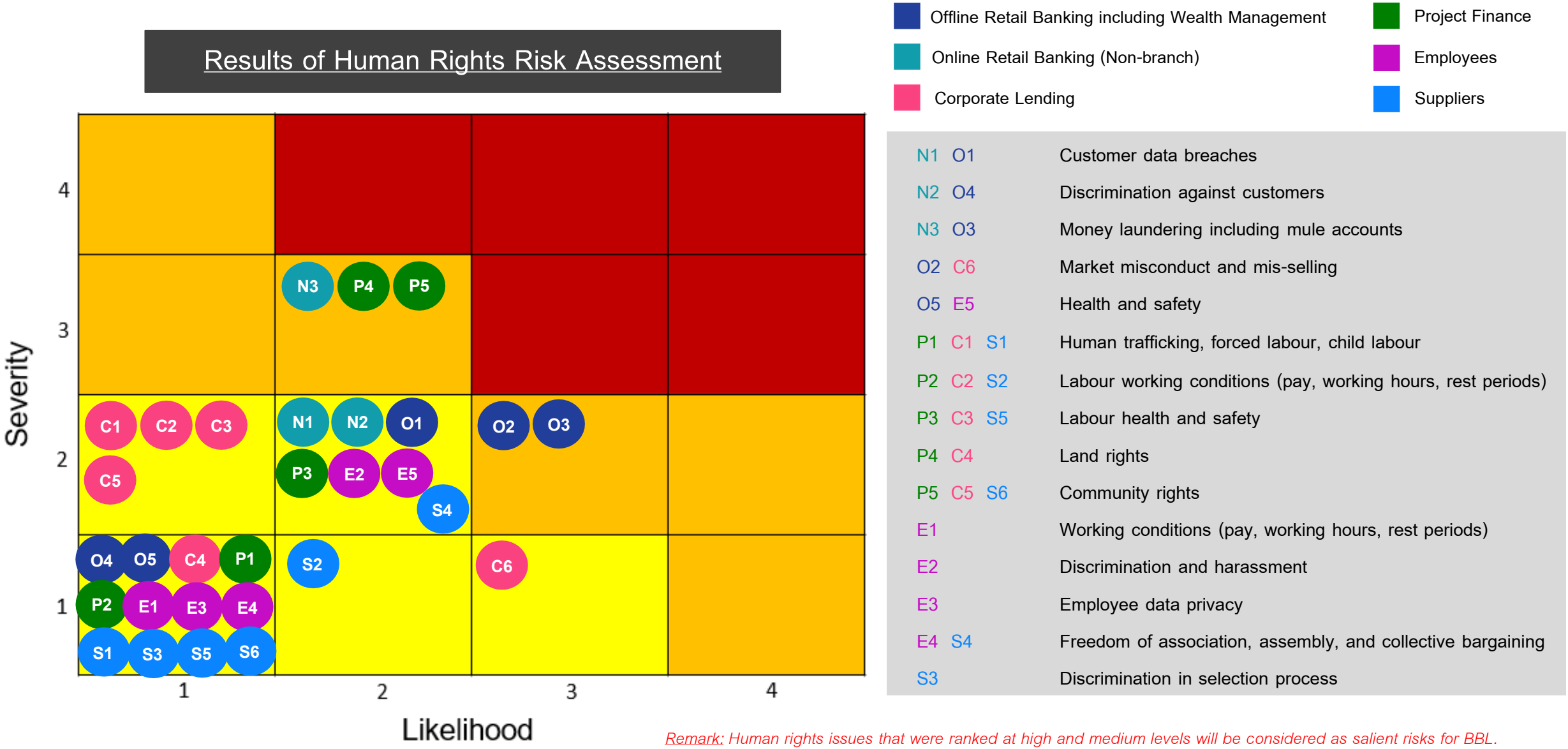
High	High risks are salient human rights risks that need to be addressed with additional prevention/mitigation measures.
Medium	Medium risks are salient human rights risks that have been mitigated to certain extent but still need additional, not necessarily immediate, prevention/mitigation measures.
Low	Low risks are human rights risks that have been reduced to harmless or insignificant level through prevention/mitigation measures but should still be monitored regularly.



[Human Rights Risk Matrix](#)

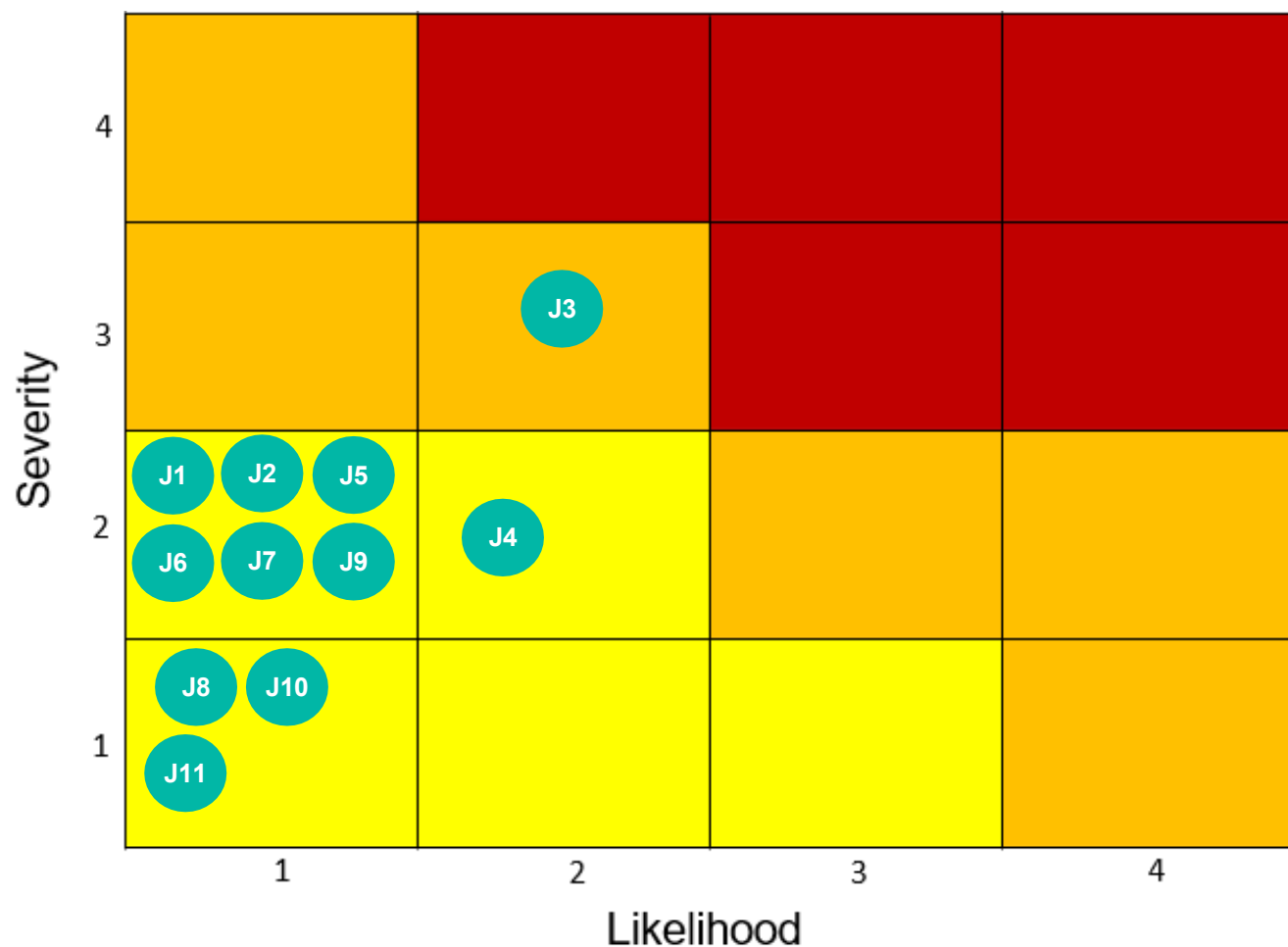
Remark: Human rights issues that were ranked at high and medium levels will be considered as salient risks for BBL.

2. Risk and Impact Assessment



2. Risk and Impact Assessment

Results of Human Rights Risk Assessment



Joint Ventures (including stakes above 10%)

- J1 Customer data breaches
- J2 Employee data privacy
- J3* Community rights and land rights
- J4 Discrimination and harassment
- J5 Working conditions
- J6 Health and safety
- J7 Financing technologies and innovation that cause human rights abuses
- J8 Unsafe products
- J9 Investing in companies that cause adverse environmental or social impacts, and human rights violation

Remark:

- Human rights issues that were ranked at high and medium levels will be considered as salient risks for BBL.

- *from project financing

2. Risk and Impact Assessment (Own Business Activities and Operations)

Inherent Risk Assessment, Residual Risk Assessment, and Mitigation Measures

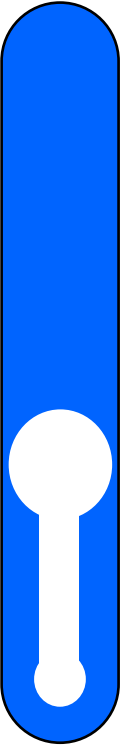
Overview Results of 2025 BBL Human Rights Risk Assessment



100%

All BBL's own business activities and operations were assessed, including

- Online Retail Banking (Non-branch)
- Offline Retail Banking including Wealth Management
- Corporate Lending
- Project Finance
- Internal Operations



37%

37% of BBL's business activities and operations were identified to have salient human rights risks:

Online Retail Banking (Non-branch)

- Money laundering including mule account

Offline Retail Banking including Wealth Management

- Market misconduct and mis-selling
- Money laundering including mule accounts

Project Finance

- Land rights
- Community rights



100%

All of BBL's business activities and operations with human rights risks have mitigation measures and remediation process implemented. Additional measures may be developed as appropriate to foster the existing measures.

Remark:

- The coverage of BBL's own business activities and operations was calculated as percentage of total revenue.
- Human rights issues that are ranked at high and medium levels will be considered as salient risks.

2. Risk and Impact Assessment (BBL’s Tier 1 Critical Suppliers)

Inherent Risk Assessment, Residual Risk Assessment, and Mitigation Measures

Overview Results of 2025 BBL Human Rights Risk Assessment



100%

All BBL’s Tier 1 critical suppliers were assessed.



0%

0% of BBL’s Tier 1 critical suppliers were associated with human rights risks (no salient risks founded).



100%

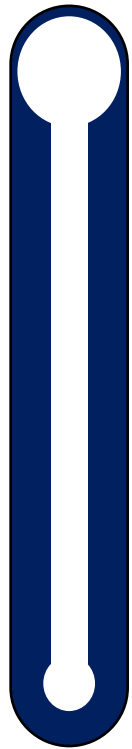
All of BBL’s Tier 1 critical suppliers have sufficient mitigation measures and remediation process in place to prevent and remedy potential human rights risks.

Remark: Tier 1 critical suppliers are suppliers whom BBL have high spending with; critical component suppliers which produce essential goods and services for BBL; and non-substitutable suppliers which produce products and services that cannot be easily replaced by other sources.

2. Risk and Impact Assessment (BBL's Joint Ventures*)

Inherent Risk Assessment, Residual Risk Assessment, and Mitigation Measures

Overview Results of 2025 BBL Human Rights Risk Assessment



100%

All BBL's joint ventures* (total of 13) were assessed.



23%

23% of BBL's joint ventures* (3 out of 13) were identified to be exposed to salient human rights risks:

- Community rights and land rights violation caused by project finance



100%

All of BBL's joint ventures* with salient human rights risks have mitigation measures and remediation process implemented. Additional measures may be developed as appropriate to foster the existing measures.

Remark:

- * BBL's joint ventures refer to the companies that Bangkok Bank Public Company Limited invests above 10 percent.
- Human rights issues that are ranked at high and medium levels will be considered as salient risks.

3. Integration and Management: Salient Risks



1. Online Retail Banking (Non-branch): Money Laundering Including Mule Accounts

Risks:

- Online banking platforms may be used as a channel to conduct money laundering transactions, which may be used to support human rights violations such as modern slavery
- Online mule accounts can be used to facilitate frauds or financial crimes and activities of scam gangs involving human trafficking and forced labor

Affected Stakeholders and Vulnerable Groups:

Customers, communities, workers, elderly, disabled persons, and retirees

Mitigation Measures/Actions:

- Anti-money laundering and counter terrorism financing policy
- Require customer's identity and facial verification before transferring money above certain thresholds via mobile banking
- Collaborate with relevant government agencies to continuously upgrade financial fraud management to effectively detect, track, and suspend suspicious transactions and accounts
- Develop internal database for high-risk persons and monitoring systems to detect suspicious transactions
- Limiting the use of mobile banking to only one account user per one customer and one mobile phone number
- Communicate the Bank's policy and practical guidelines as well as the tactics used by scam gangs to all parties involved, including employees and customers

3. Integration and Management: Salient Risks



2. Offline Retail Banking Including Wealth Management: Market Misconduct and Mis-selling

Risk:

Potentially inform customers of unclear, incomplete, and insufficient information that may lead them to buy products or services not fully aligned with their interest.

Affected Stakeholders and Vulnerable Groups:

Customers, elderly, disabled persons, and low-income persons

Mitigation Measures/Actions:

- Establish market conduct policy and guidelines that are aligned with the Bank of Thailand regulations
- Customer suitability assessment is required
- Annually conduct customer satisfaction survey to collect insights and improve service quality
- Conduct Service and Sales Quality Roleplay (SQR)*
- Randomly verify quality of sales through call back process
- Conduct mystery shopping at branches
- Communicate and provide training programs related to market conduct practices to relevant staff, as well as having market conduct knowledge test
- Adopt 3 Lines of Defense

*Remark: * Service and Sales Quality Roleplay (SQR) is an activity for the process of presenting financial products, including investment, funds and insurance using a roleplay approach to ensure that the product sales process meets standards and complies with good market conduct practices.*

3. Integration and Management: Salient Risks



3. Offline Retail Banking Including Wealth Management: Money Laundering Including Mule Accounts

Risk:

Mule accounts and related transactions may be used to facilitate money laundering and illegal activities of scam gangs, including modern slavery and fraud.

Affected Stakeholders and Vulnerable Groups:

Customers, communities, workers, elderly, disabled persons, and retirees

Mitigation Measures/Actions:

- Anti-money laundering and counter terrorism financing policy
- Put in place processes such as Know Your Customer (KYC), Customer Due Diligence (CDD) and Politically Exposed Person (PEP)
- Develop internal database for high-risk persons and monitoring systems to detect suspicious transactions
- Collaborate with relevant agencies to continuously upgrade financial fraud management measures to block access to scammers, detect and track suspicious transactions or accounts used by scammers to receive and transfer money
- Communicate the Bank's policy and practical guidelines as well as the tactics used by scam gangs to all parties involved, including employees and customers

3. Integration and Management: Salient Risks



4. Project Finance: Land Rights

Risk:

Projects financed by the bank could be exposed to risk related to land rights violation, including land acquisition through eviction and involuntary resettlement and displacement.

Affected Stakeholders and Vulnerable Groups:

Local communities, indigenous people, women, children, disabled persons, and elderly

Mitigation Measures/Actions:

- Responsible lending policy
- Compliance with local laws and regulations is required for all projects
- Incorporate ESG issues that must be considered into project loan approval process
- Adapt the Equator Principles into credit underwriting process
- Embed Environmental and Social Due Diligence in credit process for project finance
- Check customers' historical records on negative E&S impacts
- Projects categorized as high or moderate environmental and social risk are required to conduct Environmental and Social Impact Assessment (ESIA), have proper environmental and social risk mitigation measures in place, hold consultation sessions with affected stakeholders, and establish grievance mechanism
- Training on E&S risk management

3. Integration and Management: Salient Risks



5. Project Finance: Community Rights

Risk:

Projects financed by the Bank could be exposed to human rights risk related to community rights (e.g., health and safety, standard of living and natural resource degradation). The projects could generate air, water, and soil pollution, hazardous materials, and wastes or contaminated substances, which negatively affect well being of local communities and other stakeholders.

Affected Stakeholders and Vulnerable Groups:

Local communities, indigenous people, women, children, disabled persons, and elderly

Mitigation Measures/Actions:

- Responsible lending policy
- Compliance with local laws and regulations is required for all projects
- Incorporate ESG issues that must be considered into project loan approval process
- Adapt the Equator Principles into credit underwriting process
- Embed Environmental and Social Due Diligence in credit process for project finance
- Check customers' historical records on negative E&S impacts
- Projects categorized as high or moderate environmental and social risk are required to conduct Environmental and Social Impact Assessment (ESIA), have proper environmental and social risk mitigation measures in place, hold consultation sessions with affected stakeholders, and establish grievance mechanism
- Training on E&S risk management

3. Integration and Management: Salient Risks



6. Joint Ventures (the overseas banks): Community Rights and Land Rights

Risk:

Projects financed could generate air, water, and soil pollution, hazardous materials, and wastes or contaminated substances, which negatively affect well being of local communities and other stakeholders. The projects could also be exposed to risk related to land rights violation, including land acquisition through eviction and involuntary resettlement and displacement.

Mitigation Measures/Actions:

- Sustainable financing policy/ responsible lending policy
- Compliance with local laws and regulations is required for all projects
- E&S risk assessment at the project level is required
- E&S management, including monitoring, is in place
- Training on E&S risk management

Affected Stakeholders and Vulnerable Groups:

Local communities, indigenous people, women, children, disabled persons, and elderly

3. Integration and Management: Mitigation Measures/Plans



Total of 807 sites have mitigation measures/plans in place

All of BBL's own operational sites (796 sites) were assessed, and all of them have mitigation measures/plans to prevent or reduce the impact and/or the likelihood of human right issues.

- 5 head office buildings
- 226 branches in Bangkok
- 565 branches outside Bangkok

All of BBL's tier 1 critical suppliers (11 suppliers) were assessed, and all of them have mitigation measures/plans to prevent or reduce the impact and/or the likelihood of negative human right issues.

- 11 Tier 1 suppliers

3. Integration and Management: Mitigation Measures/Plans



Total of 13 joint ventures (stakes above 10%)
have mitigation measures/plans in place

All of BBL's joint ventures were assessed, and all of them have mitigation measures/plans to prevent or reduce the impact and/or the likelihood of human rights issues.

4. Tracking and Communication

BBL is committed to respecting human rights of all stakeholders, including vulnerable groups, and to ensuring necessary prevention and mitigation measures, and remediation actions are developed to prevent the occurrence of human rights violation and to mitigate adverse human rights impacts that might have directly or indirectly caused by BBL's business activities and operations.

Striving for better serving our society and supporting the Sustainable Development Goals (SDGs), BBL has monitored human rights performance and has provided communication channels for all stakeholders and vulnerable groups to raise their concerns or issues to BBL. This allows BBL to conduct human rights investigation and further develop effective mitigation measures and remediation actions.

In addition, BBL has regularly communicated results of human rights performance such as human rights initiatives, issues, violation cases, and mitigation and remediation actions, to all stakeholders through its Sustainability Report and website.

5. Reporting Channels and Procedures

BBL provides reporting channels for all stakeholders, both internal and external stakeholders, to send complaints related to human rights violations as follows:

Whistleblowing Channels



Postal mail: Send to the Audit Committee or the Customer's Complaints and Fraud Cases, Compliance Unit
333 Silom Road, Silom, Bang Rak, Bangkok 10500



E-mail: Send to the Audit Committee or the Customer's Complaints and Fraud Cases, Compliance Unit
Whistleblowing@bangkokbank.com

Confidentiality is guaranteed, and anonymous report is allowed.

To ensure effective policy implementation, we provide human rights, anti-discrimination and anti-harassment course for all employees including managers. The course includes details on the principles, reporting channel, handling of reports, procedures, and disciplinary actions.

5. Reporting Channels and Procedures

Whistleblowing and Whistleblower Protection Measures

We provide open channels for whistleblowers and treat all parties equally based on transparency and fairness while ensuring an appropriate investigation period. Measures are in place to protect those whistleblowers and those who cooperate in the investigation from being violated or harassed. Information about whistleblowers and those who cooperate during the investigation will be kept confidential with access restricted to responsible parties unless the disclosure is required by law or becomes necessary. Note that bona fide whistleblowers and those who cooperate during the investigation will not be punished or treated negatively by the Bank.



Whistleblowing Management

The Audit Committee, and the Customer's Complaints and Fraud Cases under the Compliance Unit, oversee and deliberate on whistleblowing cases with prudence and fairness by ensuring that the investigation process is transparent and fair. For severe or complex cases, the Customer Complaint and Fraud Unit may refer the case to an ad hoc committee or the Audit Committee for consideration as deemed necessary and appropriate.



Governance of Whistleblowing Procedures

The Audit Committee and the Customer's Complaints and Fraud Cases supervise whistleblowing or complaints procedures from accepting whistleblowing or complaint cases to closing those cases, as well as notifying and reporting progress updates and results to relevant parties. Moreover, these responsible parties also ensure that preventive and corrective measures are in place and wrongdoers will be punished according to the Bank's stipulated disciplinary actions ranging from an official warning in writing, remuneration deduction, to employment termination.

6. Remediation

Process Implemented to Mitigate Human Rights Risks and to Take Remediation Actions

1

- Integrate results from the human rights risks assessment into human rights risks register;
- Inform and discuss with responsible departments about the risks and impacts;
- Develop mitigation measures for salient human rights risks to reduce the likelihood of adverse events and their severity of impacts; and
- Determine appropriate action plans.

3

- Monitor the effectiveness of existing and newly implemented mitigation measures;
- Report the progress and challenges encountered to responsible executives; and
- Develop remediation actions for affected stakeholders, including vulnerable groups, when adverse human rights impacts do occur, and mitigation measures fail to reduce such human rights impacts or severity.

2

- Implement the action plans by responsible departments; and
- Report the implementation to stakeholders, including vulnerable groups.

4

- The remediation actions, including options to compensate in kind or in monetary terms, need to be approved by responsible executives before being implemented;
- When the adverse events occur, inform the affected stakeholders about remediation actions taken. In addition, feedbacks received from the affected persons may lead to further actions if necessary; and
- Keep monitoring and following up with the affected stakeholders until they are recovered from the impacts.

6. Remediation

Remediation Actions Taken



In 2025, there was no case of human rights violation, nor complaints or grievances related to human rights submitted to any provided channel. Therefore, there was no remediation action taken.

However, BBL will keep tracking, monitoring and preventing human rights violations, as committed, to ensure timely and sufficiently response to such violations as well as their adverse consequences. In case the violation occurs, BBL will take appropriate remediation action prioritizing the affected stakeholders. The remediation includes financial or non-financial compensation, restitution, fines and apologies. At the same time, proactive measures will be developed to prevent reoccurrence.

Appendix

List of Companies* that BBL Owns Stocks above 10 Percent

Company	Type of Business
BANGKOK BANK BERHAD	Bank
BBL (CAYMAN) LIMITED	Investment Company
BANGKOK BANK (CHINA) COMPANY LIMITED	Bank
SINSUPTAWEE ASSET MANAGEMENT COMPANY LIMITED	Asset Management
BUALUANG VENTURES LIMITED	Venture Capital
BUALUANG SECURITIES PUBLIC COMPANY LIMITED	Securities Business
PT BANK PERMATA TBK.	Bank
BSL LEASING COMPANY LIMITED	Leasing and Hire Purchase
BBL ASSET MANAGEMENT COMPANY LIMITED	Asset Management and Private Fund
THAI PAYMENT NETWORK COMPANY LIMITED	Payment Card Network and Inter-institution Fund Transfer System
PROCESSING CENTER COMPANY LIMITED	Computer Services
BCI (THAILAND) COMPANY LIMITED	Computer Programming Activities
NATIONAL ITMX COMPANY LIMITED	Electronic Transactions between Financial Institutions

*Remark: *Refer to the companies that BBL has directly invested and that still operate their business.*