

Human Rights Due Diligence Report 2025

SCBX Public Company Limited

July 2026

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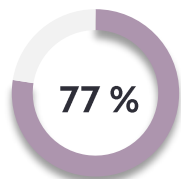
Executive Summary

SCBX aligns its operations with internationally accepted human rights standards, including the UN Guiding Principles on Business and Human Rights (UNGPs), and the SCBX Group's Human Rights Policy.

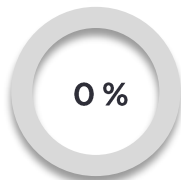
SCBX continues to enhance its governance and management process through human rights due diligence (HRDD) across its own operations, value chain, and joint ventures to identify, assess, manage, mitigate, and monitor actual and potential human rights impacts, especially salient human rights issues.

In 2025, SCBX reassessed and prioritized salient human rights risks, while further enhancing mitigation measures and controls to prevent and reduce adverse impacts across its operations.

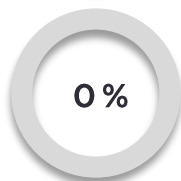
The results of the human rights risk assessment across three key scopes are as follows:



Own Operations: 100% of revenue-generating SCBX functions were assessed. 77% were identified with salient human rights issues, including *Money laundering, terrorist financing, fraud and scams, as well as labor practices and community rights associated with project finance.*



Joint ventures: 100% of joint ventures were assessed, with no joint venture associated with human rights risks.



Tier-1 Suppliers and Contractors: 100% of Tier-1 suppliers and contractors were assessed, with no critical tier-1 supplier or contractor associated with human rights risks.

All entities identified with salient human rights risks have implemented appropriate mitigation or remediation measures

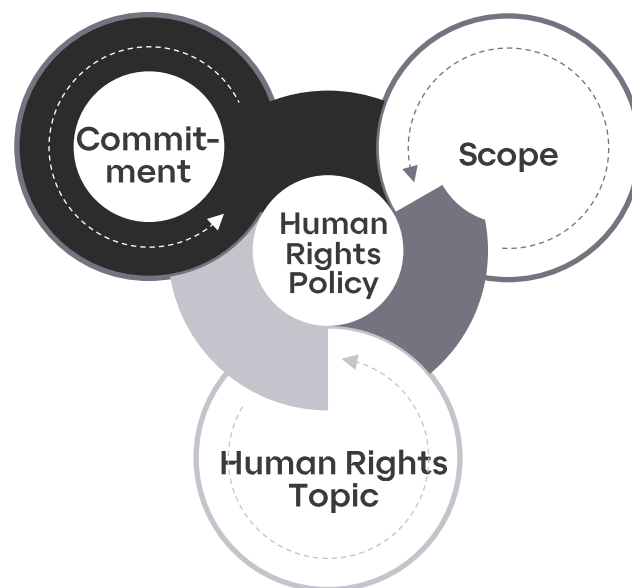


Human Rights Policy And Governance Structure

Human Rights Policy

SCBX Human rights policy can be summarized as follow:

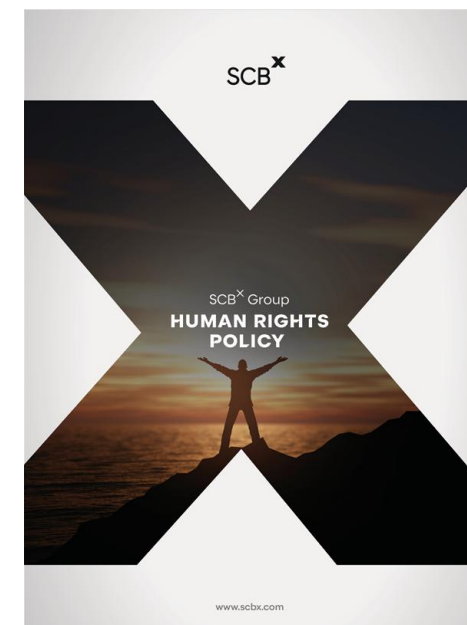
- **Participates in the UN Global Compact.**
- **Commits to respect human rights** in accordance with internal standards, United Nation Guiding Principles (UNGPs), International Bill of Human Rights, and ILO Declaration on Fundamental Principles and Rights at Work.



- **Applies to SCBX Group entities under operational control:** subsidiaries, joint ventures, Board, executives, and employees.
- **Communicate to all stakeholders** including business partners, suppliers, to follow the Company's human rights expectation.

- **SCBX commits to uphold these following human rights issues:** Human trafficking, Forced labor, Child labor, Freedom of association, Right to collective bargaining, Discrimination, Right to privacy and customers' rights

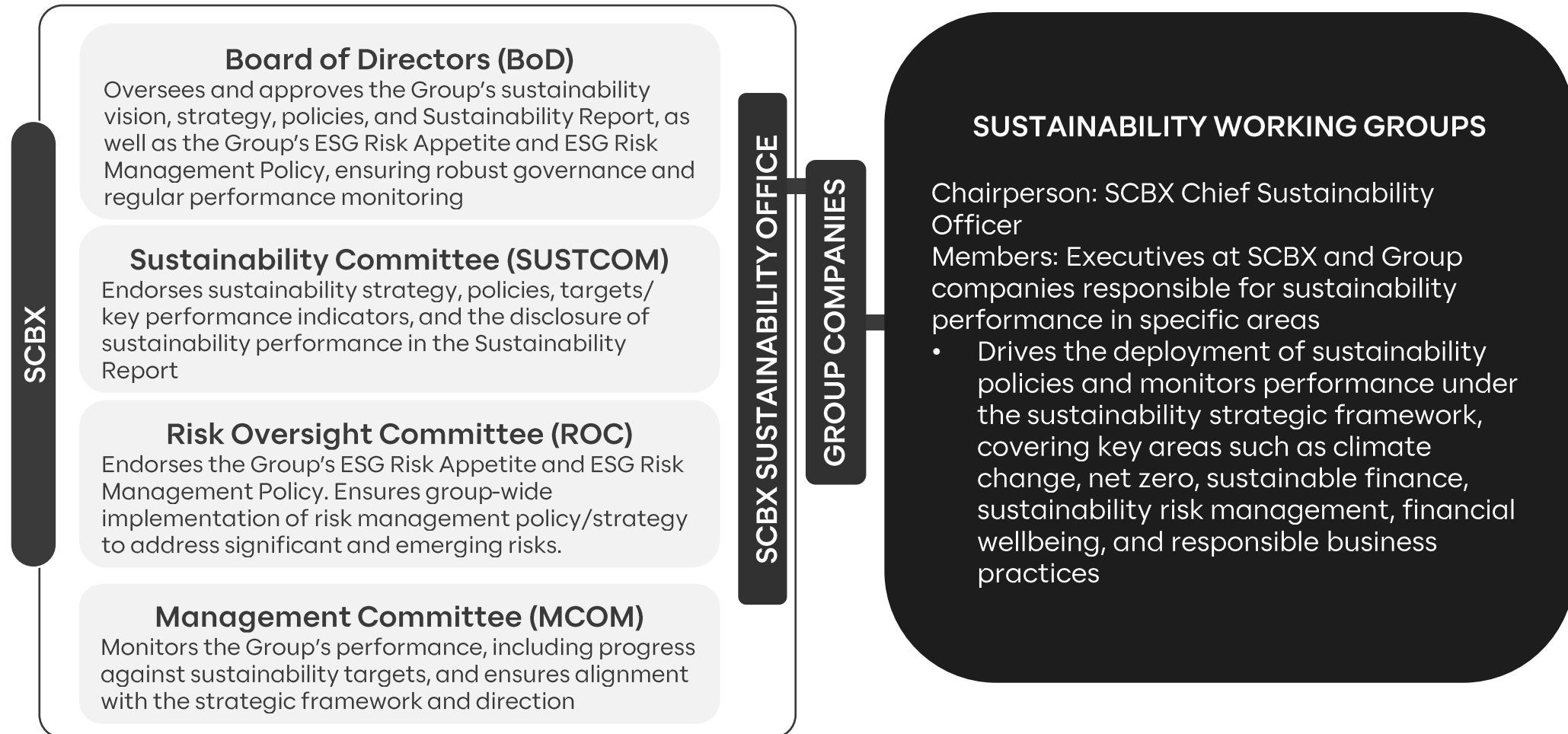
For more details, SCBX human rights policy can be found in the link below:



[SCBX human rights policy](#)

Human Rights Structure

To ensure compliance with the SCBX Group Sustainability Policy and framework, SCBX Group has established a robust governance structure at the Group level to govern human rights management in the workplace. This structure clearly defines roles and responsibilities from the Board of Directors to portfolio companies, ensuring accountability for upholding human rights principles.



SCBX Human Rights Structure

SCBX has designated Sustainability team as the main function responsible for overall human rights policy and management. Relevant functions provide day-to-day operational support to the human rights governance structure, in alignment with the United Nations Guiding Principles on Business and Human Rights (UNGPs), to further strengthen the human rights management in our operation.

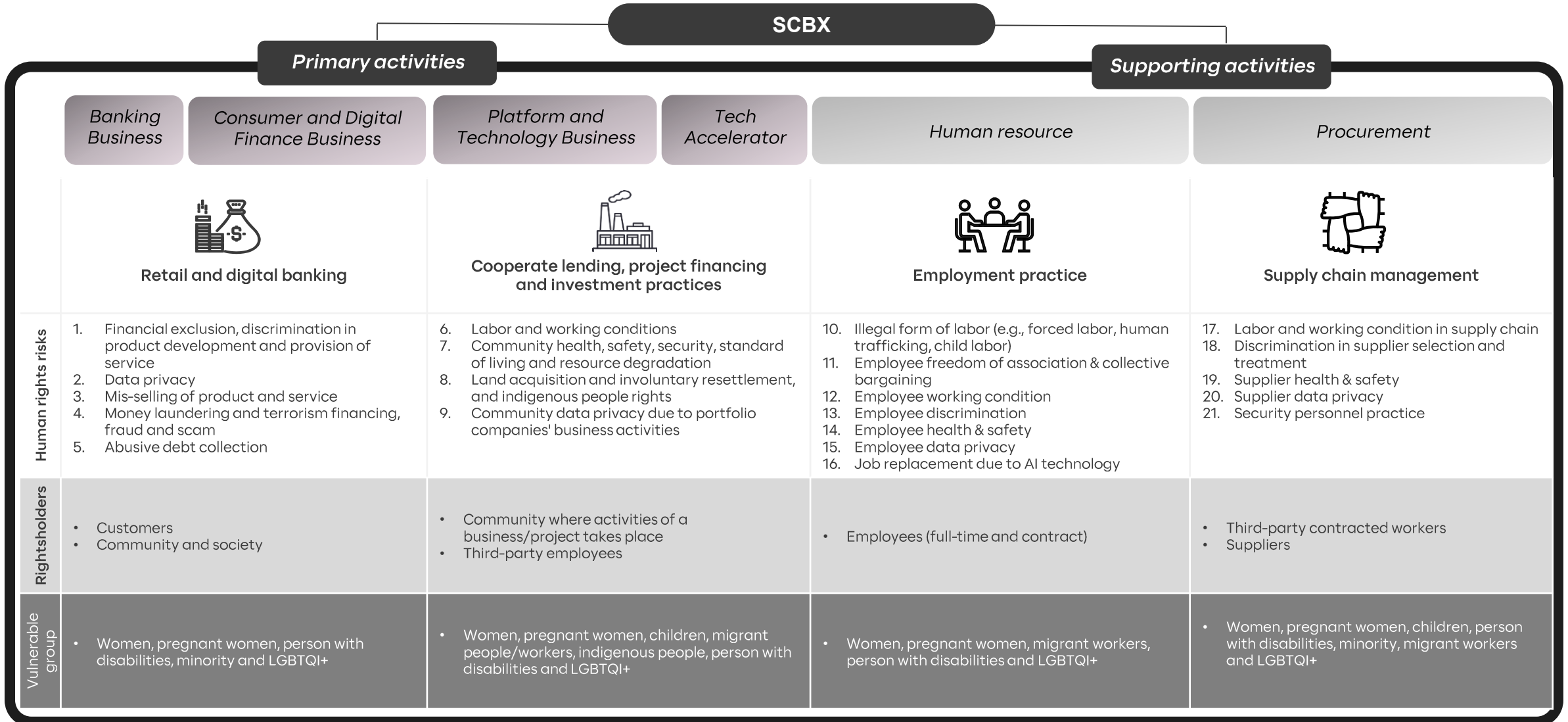
Responsibilities	Description	Functions involved						
		Sustain ability	Risk Mgmt.	Talent	Customer Relations	Compli ance	Procu re ment	Audit
 Establish and review human rights policy	Ensuring the periodic review and necessary updates of the human rights policy so that it continues to reflect evolving human rights risks, regulatory expectations, and SCBX's strategic targets.	A+R	C	I	I	I	I	
 Assess human rights risk and impact across value chain	Identify human rights risks across SCBX's operations and portfolio by leveraging human rights records and stakeholder insights, assess the salient issues, and maintain periodic review.	A+R	C	R	R	R	R	
 Develop and implement mitigation and preventive measures	Establish additional mitigation measures addressing the salient issues, including strengthening existing process, providing targeted training, and establishing new policy.	A+R	C	R	R	R	R	
 Track and monitor the effectiveness of mitigation and preventive measures across operation	Develop KPIs/KRIs, as appropriate, to measure and monitor the organization's human rights violation records and management effectiveness, obtain insights from external experts, and report the outcomes to management as necessary.	A+R	C	R	R	R	R	
 Review the effectiveness of grievance mechanism	- Conduct regular periodic review of existing grievance mechanism based upon established KPIs or third-party audit using UNGPs evaluation criteria. - Collect user's satisfaction through survey, focus group, interview., etc.	A	I	R	I	I	I	R
 Develop report to the stakeholders	Develop a human rights due diligence report to communicate SCBX's human rights management practices and performance to external stakeholders	A+R	I	I	I	I	I	

Responsible
 Accountable
 Consulted
 Informed



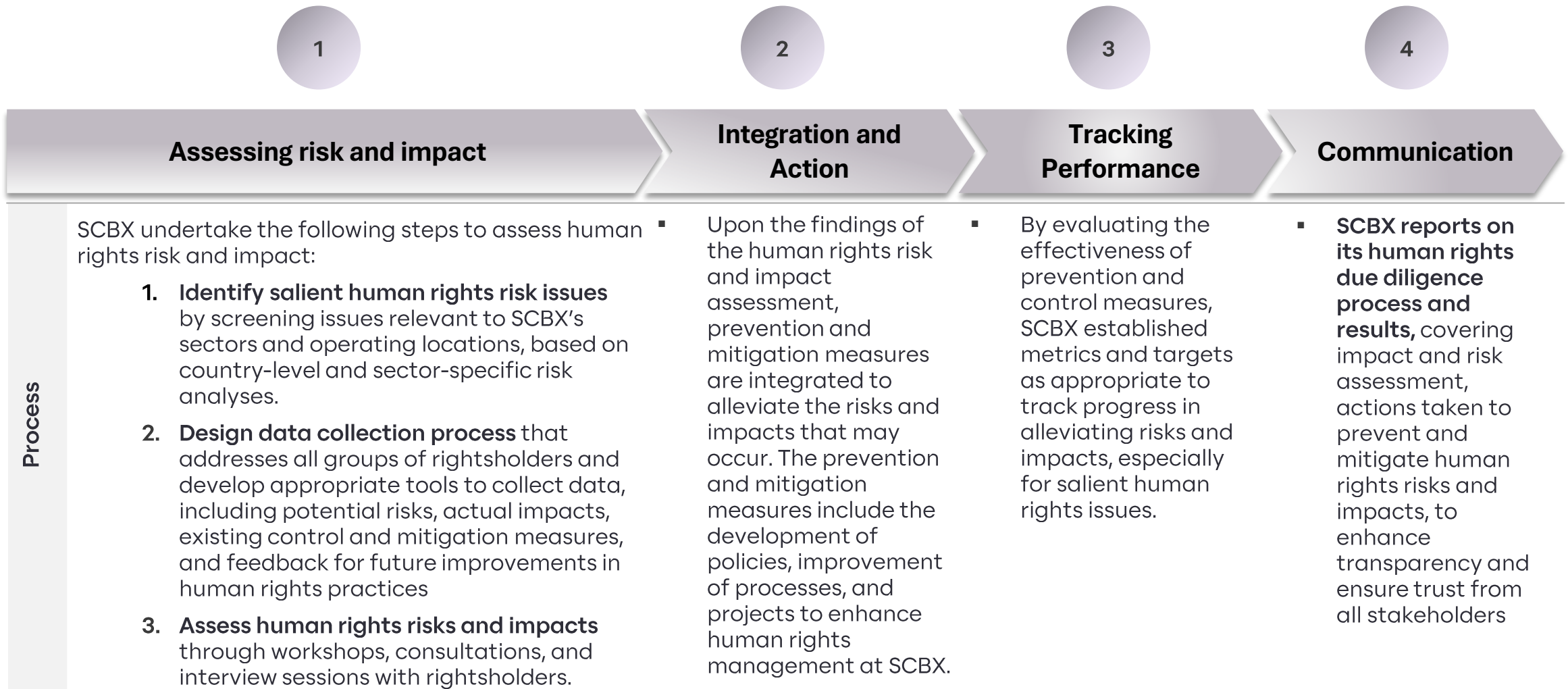
Human Rights Risk And Impact Assessment

Scope Of Human Rights Risk and Impact Assessment



Human Rights Risk And Impact Assessment Process

SCBX conducts human rights risk and impact assessments **every three years** by following the Human Rights Due Diligence (HRDD) framework guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs) as demonstrated below.



Human Rights Risk And Impact Assessment Result (1/2)

Own Operations

100 %

of revenue-generating subsidiaries were assessed on human rights risks

77 %

of revenue-generating subsidiaries were identified with human rights risks*

100 %

of identified human rights risks with mitigation measures action taken

Joint Ventures

100 %

of total joint ventures were assessed.

0 %

of the critical joint ventures was found to be at risk.

100 %

of identified human rights risks with mitigation measures action taken

Contractors and Tier-1 Suppliers

100 %

of total critical tier 1 suppliers were assessed.

0 %

of the critical tier 1 suppliers was found to be at risk.

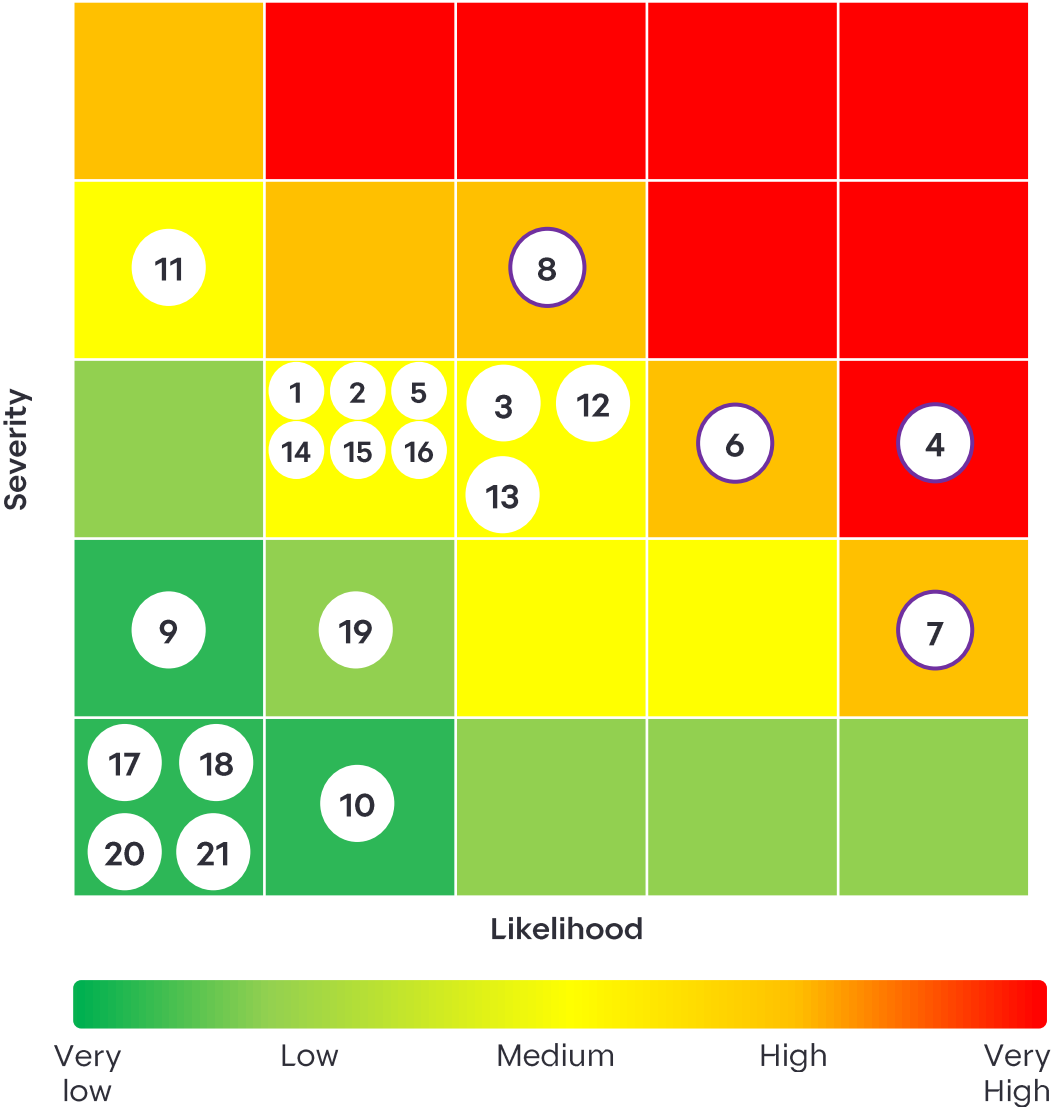
100 %

of identified human rights risks with mitigation measures action taken

*This 77% refers to the proportion of revenue from SCBX business activity identified with salient human right issues.

Human Rights Risk And Impact Assessment Result (2/2)

Four salient human rights issues were identified from the overall assessment, reflecting areas with higher potential impact and relevance to SCBX’s business activities



- Retail And Digital Banking**

 - 1. Financial exclusion, discrimination in product development and provision of service
 - 2. Data privacy
 - 3. Mis-selling of product and service
 - 4. Money laundering, terrorist financing, fraud and scams
 - 5. Abusive debt collection
- Corporate lending / project finance and investment practices**

 - 6. Labor and working conditions
 - 7. Community health, safety, security, standard of living and resource degradation
 - 8. Land acquisition and involuntary resettlement, and indigenous people rights
- Employment practice**

 - 9. Illegal form of labor
 - 10. Employee freedom of association & collective bargaining
 - 11. Employee working condition
 - 12. Employee discrimination
 - 13. Employee health & safety
 - 14. Employee data privacy
 - 15. Job replacement due to AI technology
- Supply chain management**

 - 16. Labor and working condition in supply chain
 - 17. Discrimination in supplier selection and treatment
 - 18. Supplier health & safety
 - 19. Supplier data privacy
 - 20. Security personnel practice

Salient issues are shown in purple

Salient Human Rights Issues

1. Money laundering, terrorist financing, fraud and scams

Topic	Description		
Risk owner	SCB		
Potential risks and impact on human rights	- Digital fraud and scams remain sector-wide challenges that can lead to serious and sometimes irreversible consequences for customers and the general public. Such failures undermine consumer trust and can result in financial losses, legal disputes, and significant reputational damage. - These occurrences pose a significant risk to fundamental human rights, including rights to personal security, rights to own property, and rights to privacy.		
Affected rights holders and vulnerable group at risk	When customers are scammed through unauthorized transfers, impersonation, phishing, or fake investment schemes, the resulting financial losses can be substantial, sometimes involving life savings, pensions, or large deposits. Vulnerable groups at risk include women, people with disabilities, minorities, and LGBTQI+ individuals.		
Existing and additional prevention and mitigation measures on fraud and scams issue		Existing measures	Additional measures
	Prevention	- Authentication & customer profiling based on risk level across all channels - Implement an application fraud detection system - Continuously communicate fraud awareness, such as 'Fraud fighters (แก้ โทษ na โทษ) campaign - AI-driven and rule-based mule account prevention	Reduce scam loss and enhanced customer trust & regulatory alignment
	Detection	- Near real-time fraud monitoring - Mule account notice: Branch officers, especially in high-risk branches, are notified with continuously updated lists of mule account - Enhancement of accuracy of mule account management across risk levels, with precision more than 80%	Enhanced adoption of AI-driven fraud transaction monitoring and mule account detection for retail and business customer segments
	Investigation & Co-operation	- Coordinate with clients to expand customer protection efforts - Establish a war room with the Royal Thai Police - Respond promptly to notified cases and expand financial routing via the CFR system with no backlog - Rapid mule account fund flow tracing within SLA, achieving the fastest turnaround among D-SIBs	Mule account fund flow tracing via Fully API (improve financial routing speed)
	Remediation	Continue to identify key issues, determine root causes, and implement effective remediation in a timely manner	

Salient Human Rights Issues

2. Labor and working conditions

Topic	Description
Risk owner	SCB: corporate banking, credit product origination, investment banking and capital markets
Potential risks and impact on human rights	- The risk issues related to SCB when financing a business/project of which activity exposes individuals to the violation of third-party labor rights, including illegal form of labor (e.g., hiring child labor), unfair working condition (e.g., lack of working contract documented, delayed of social security and overtime payment) and health and safety (e.g., improper Personal Protective Equipment (PPE)). The violation may potentially occur with the mega-project finance that require high and intensive workforce such as hydropower plant, etc. - These occurrences pose a significant risk to fundamental human rights, including rights to enjoy just and favorable conditions of work, rights to adequate standard of living, and rights of protection for the child.
Affected rights holders and vulnerable group at risk	The rights of third-party employees may be affected from potential risk of unfair working condition as completing the project financed by the bank. The vulnerable group at risk include women, children and migrant workers.
Existing and additional prevention and mitigation measures	SCBX is committed to continuously addressing and advancing human rights issues related to project finance, particularly through compliance with the Equator Principles. The Group has addressed identified issues through appropriate mitigation and remedy actions by project developer/borrower, with ongoing monitoring of project implementation and outcomes, as further detailed in "Existing and Additional Prevention and Mitigation Measures for Corporate Lending Salient Issues on page 17.

Salient Human Rights Issues

3. Community health, safety, security, standard of living and resource degradation

Topic	Description
Risk owner	SCB: corporate banking, credit product origination, investment banking and capital markets
Potential risks and impact on human rights	- The risk issues are related to SCB when financing a business/project of which activities expose the community to increased risks of negative health and safety impacts due to soil erosion, loss of fertile land, water contamination from sediment runoff to streams and creeks, disturbance to water quality and local aquatic life, and sediment runoff to local paddy fields, plantations, and public utilities. In addition, these may include construction-related dust and noise, septic tank leakage, and hazardous waste or dust generated. - These occurrences pose a significant risk to fundamental human rights, including the rights to an adequate standard of living and the rights to health.
Affected rights holders and vulnerable group at risk	People in communities nearby the project area, which include vulnerable groups such pregnant women and person with disabilities.
Existing and additional prevention and mitigation measures	SCBX is committed to continuously addressing and advancing human rights issues related to project finance, particularly through compliance with the Equator Principles. The Group has addressed identified issues through appropriate mitigation and remedy actions by project developer/borrower, with ongoing monitoring of project implementation and outcomes, as further detailed in "Existing and Additional Prevention and Mitigation Measures for Corporate Lending Salient Issues on page 17.

Salient human rights issues

4. Land acquisition and involuntary resettlement, and indigenous people rights

Topic	Description
Risk owner	SCB: corporate banking, credit product origination, investment banking and capital markets
Potential risks and impact on human rights	- The risk issues for SCB arise when financing a business or project that has obtained land which may involve relocation that resulted in inadequate compensation. In addition, these risks include situations where SCB finances a business or project that harms the traditional livelihoods of indigenous peoples or local communities in the project area, such as through the destruction of their lands, territories, resources, or cultural heritage. - These occurrences pose a significant risk to fundamental human rights, including the rights to self-determination, the rights to an adequate standard of living, the rights of minorities, the rights to freedom of movement, and the rights to own property.
Affected rights holders and vulnerable group at risk	Communities located in areas where projects, particularly infrastructure projects, are planned may face various risks of rights violations. These risks can include breaches during the consent process, delays in compensation, or inadequate monitoring of rehabilitation plans that fail to restore the local standard of living. Besides, indigenous communities' rituals and beliefs may be disrupted by project operations, and communities that are required to relocate may face obstacles in practicing their beliefs because their new neighborhoods could be far from sacred sites. Vulnerable groups at risk include indigenous people.
Existing and additional prevention and mitigation measures	SCBX is committed to continuously addressing and advancing human rights issues related to project finance, particularly through compliance with the Equator Principles. The Group has addressed identified issues through appropriate mitigation and remedy actions by project developer/borrower, with ongoing monitoring of project implementation and outcomes, as further detailed in "Existing and Additional Prevention and Mitigation Measures for Corporate Lending Salient Issues on page 17.

Existing and Additional Prevention and Mitigation Measures For Corporate Lending and Project Finance Salient Issues

Existing prevention and mitigation measure

- SCB has issued a **Sustainable Finance and Advisory Statement**, which includes a Credit Policy Guideline. This guideline governs the integration of ESG considerations throughout the credit lifecycle, from onboarding and loan approval to ongoing monitoring. It incorporates the use of an exclusion list during the onboarding process, **compliance with the Equator Principles (EPs) for significant projects**.
- As a signatory, SCB follows procedures consistent with EPs. For projects classified as high-risk, clients are required to carry out comprehensive environmental and social impact assessments. Moreover, projects located in non-designated countries under the Equator Principles, such as Thailand and Laos, must comply with the applicable **IFC Performance Standards on Environmental and Social Sustainability (PS)** as well as the World Bank Group Environmental, Health and Safety Guidelines. This approach helps safeguard the rights of the workers and communities.
- **In-house ESG risk assessment** was introduced in late 2025 to identify key ESG risks of all non-retail customers seeking new credit limits, and as part of Customer Review process. In addition to this guideline, SCB also applies sector-specific requirements for industries with higher ESG risks, along with other compliance measures to ensure adherence to applicable laws and regulations.
- SCB has also implemented other controls. For example, the projects which fall under Sustainability-linked loans may have environmental impact as one of their KPIs. In addition, SCB's clients are periodically monitored on environmental quality against local standards.

Additional prevention and mitigation measures

- Enhance the monitoring guideline for project-finance clients' human rights risks by strengthening ESG expertise for regular review of environmental and social (E&S) monitoring reports, tracking any emerging human rights violation cases, and assessing the effectiveness of client's remediation measures
- Strengthen the grievance mechanism to ensure timely communication of potential violations raised by affected communities and NGOs, allowing the Company to use its leverage more effectively and encourage clients to address issues promptly and responsibly
- SCB encourages customers in hotel industry to obtain a Global Sustainable Tourism Council (GSTC) or GSTC-recognized standards e.g., the Green Hotel Plus' certification, in exchange for lower loan interest rates. This standard covers criteria related to human rights, labor conditions, land rights, community health, and the rights of indigenous peoples.



- SCB will contact their respective clients if they become aware of any serious pending violation cases.



Evidence Of Stakeholder Consultation

Stakeholder Engagement on Human Rights Issue

The below table demonstrates evidence of stakeholder consultation on human rights issues As part of the human rights risk assessment conducted in December 2025, SCBX engaged with representatives from all key stakeholder groups through interviews. The insights gathered from these interviews informed the assessment results, including the identification of salient human rights issues. In addition, the findings have been used to provide recommendations to strengthen the Company's practices in preventing human rights violations across its operations and value chain.

Stakeholder	Observation	Recommendation
Customer	<u>Professional service that entails effective treatment to customer</u> The project finance customer has raised no major concerns over SCB's treatment to customer as perceives no discrimination in SCB's lending process, describing engagements as professional and transparent with confident to handling confidential data to the bank. In addition, the representative of the retail's customer also admire the bank on its improvement of better product communication in which they believe help reduce concern over mis-selling cases. <i>"SCB is very detail-oriented bank when it comes to loan approval process. They carefully screen and analyze all necessary details to mitigate risk in financial perspective and environmental and social dimensions."</i>	Consistently monitor bank's compliant handling process to ensure it accessible to all customer especially the vulnerable groups and has respond or resolve the complain on a timely manner.
Employee	<u>Fair and equitable workplace, yet concern over job replacement due to AI</u> Most employees share the common view that SCBX Group has effective policies, management systems, initiatives, and programs to prevent labor rights violations in the workplace. Employees agreed that AI has affected their work routines and lead to job cut-off. However, they believe that SCB has effective mitigation plans and fair remediation measures in place to protect and uphold the rights of those who will be affected by the layoffs. <i>"SCB is constantly communicating its restructuring plan to all employees. The Company has launched several initiatives to assist those who are potentially affected by this transition, for example, organizing job fairs and providing training to equip employees with new skills for future opportunities."</i>	Maintain existing policies and programs to treat their workforce with dignity and respectful for their rights.
Supplier	<u>Transparent and fair bidding process with advance data protection system</u> Suppliers report no discrimination in SCB's bidding process, describing interactions as professional and transparent. They also trust SCBX Group's data-security practices and note no incidents of confidential data leakage. <i>"We have never experienced unfair treatment from the SCBX Group throughout its bidding process. We have received truthful information and trust that all bidders experience the same. ...We believe that there is a minimal chance of data leakage, as SCBX is a reputable financial institution and has a contract in place regarding data protection."</i>	Maintain fair and transparent procurement process to grow collaboratively networks and build effective eco-system to boost the economy.
Community	<u>Project finance may create the development amidst suffer of affected communities</u> Some of the communities affected by project finance have concern over their standard of living, occupation and compensation over their resettlement. Many are encounter with hardship to resettle their life with uncertainty on jobs and unfamiliar environment. <i>"Villagers living are deeply connected to its culture and resources, relying on fishing and river-based traditions such as boat racing. Forced relocation to distant highlands disrupts their way of life, requiring them to start over in an unfamiliar environment."</i>	Increase frequency of monitoring with project finance client to track progress of mitigation measures promised to implement to minimize the environmental and social impact.



Remedy and Grievance Mechanisms

Grievance

SCBX provides grievance mechanisms for both internal and external stakeholders to report their grievances in these following channels.



By postal address: Post Office Box 180,
Chatuchak Post Office 10900



By E-mail: whistleblower@scbx.com



By telephone: 02 544 3000

SCBX is committed to preventing retaliation against affected stakeholders and their information will be kept confidential. All reported cases are assessed, documented, and managed in a timely manner.

Remedy

SCBX Remediation Framework:

- A** Provide remedy to affected parties where it has been proven with clear evidence that SCBX has caused or contributed to adverse human rights impacts, in alignment with applicable law and regulations.
- B** Encourage the remediation of impacts directly linked to the Group's business activities. The Group may engage with clients and facilitate negotiations between affected parties to ensure effective resolution and equitable remedy.
- C** Ensure that the Group's remedy procedures are fair, impartial, and safeguarded against corruption or undue influence.

Incidents related to Human Right Impacts

SCBX continuously monitors human rights-related issues across key risk areas within its own operations*, including cases related to working conditions, discrimination and harassment, occupational health and safety, data privacy, mis-selling of products and services, and abusive debt collection.

There were no reported human rights violation cases across these key risk areas that remained unaddressed during the reporting period. All identified and substantiated cases were resolved through appropriate internal processes with necessary actions taken to protect affected rights holders and provide remediation where applicable.

SCBX remains committed to strengthening its human rights management system by using case data, investigation outcomes, and stakeholder insights to enhance its preventive, monitoring and mitigation measures.

*Current scope of data includes SCBX, SCB, CardX, and AutoX



Human Rights Awareness Promotion

Promoting Human Rights Awareness

The following initiatives are designed to educate employees and create a culture of respecting human rights:

Training

- **Code of conduct training:** Every SCBX's group employee will receive SCBX's code of conduct which addresses the various human rights related to financial and technology operations with refresher course every year.
- **Manager training on handling of reports or instances of bullying or harassment:** There was ongoing training as part of new manager training in some subsidiaries. SCBX also has plans to develop bullying and harassment training for the whole group in the future.

E-learning

To enhance human rights awareness across the group, SCBX recently developed **human rights modules** in the e-learning platform, available for staff from relevant functions:

- Business and Human Rights: From Fundamental Concepts to SCBX Practices
- Human Rights Risk Management in Corporate Lending and Project Finance Activities

Please refer to [page 25](#) for further details

Stakeholder Engagement Development

Since stakeholder engagement is an essential component in developing controls that effectively tackle the root causes of human rights violations, SCBX was aware and continued to update the stakeholder engagement framework and procedures. Recently, the development has focused on improving detailed procedures and responsibilities to ensure that stakeholder feedback is incorporated into the development of human rights measures.

Communication

SCBX remains committed to consistently communicating human rights principles to all stakeholders across our operations, value chain and business partners, in alignment with UNGP Principle 21, as follows:

- **External stakeholders:** communicated via stakeholders' engagement and publication such as Sustainability Report and human rights due diligence report
- **Internal stakeholders:** communicated via stakeholders' engagement and internal communication.

Human Rights E-learning for SCBX Group's employees

Human rights are increasingly critical to business, especially in finance and technology, with growing expectations for responsible operations across value chains. This program builds awareness and capability to manage risks in line with UNGPs and SCBX practices.

Objectives:

Participants will gain an understanding of key human rights principles, business-related impacts, and SCBX's approach, while building the ability to identify risks and apply human rights risk management in their daily work.

E-learning Format: The e-learning is delivered in an interactive podcast format, enabling engaging, conversational learning through real-life scenarios and practical discussions.

Targeted audience

- Sustainability
- Human Resource
- Risk Management
- Relationship Manager (Corporate lending and Project finance)
- Procurement
- Others



Module 1: Business and Human Rights From Fundamental Concepts to SCBX Practices

(15 minutes)

1.1 Opening Segment

- The session will begin with a brief welcome, setting the context and importance of the topic, followed by an overview of the podcast's purpose and key objectives, including expected insights and practical takeaways.

1.2 Business and Human Rights in Today's Context

- This section highlights the evolving role of businesses in society, growing expectations for responsible and sustainable conduct, and the need to integrate human rights into core strategies and operations.

1.3 Fundamental Concepts of Human Rights for Business

- This section outlines key human rights concepts for businesses, key drivers such as governance and risk management, and highlights global trends along with the Thai regulatory context.

1.4 Human Rights Risks and Opportunities in Finance and Technology

- This section highlights key human rights risks and related business opportunities, such as financial inclusion, with brief examples.

1.5 SCBX Human Rights Commitment and Management System

- This section highlights SCBX's human rights commitment, key policies, and management framework, including risk assessment, DEI, and grievance mechanisms.

1.6 Summary and Key Takeaways

- This section briefly recaps key points and reinforces human rights as both a responsibility and a strategic priority, while highlighting the role of employees and stakeholders.

Module 2: Human Rights Risk Management in Corporate Lending and Project Finance Activities

(15 minutes)

2.1 Opening Segment

- This section introduces the module, key objectives, and the importance of human rights risk in finance.

2.2 Financial Sector's Linkage to Human Rights Impacts

- This section explains how financial institutions may be linked to human rights impacts through lending and project finance, introduces the concept of leverage, and highlights the role of banks in influencing responsible practices, supported by brief examples.

2.3 Human Rights Risks in Corporate Lending and Project Finance

- This section outlines key human rights risks in lending and project finance, such as labor, community, and supply chain issues, with brief examples and reference to SCBX's salient risk areas.

2.4 Strengthening Human Rights Risk Management

- This section outlines how to strengthen human rights risk management by integrating it into ESG processes and client engagement, highlighting the role of Relationship Managers in assessing risks, engaging clients, and taking appropriate actions, supported by practical examples and case studies.

2.5 Summary and Key Takeaways

- This section recaps key linkages between finance and human rights, highlights major risks, and reinforces the role of financial institutions and Relationship Managers in managing risks and integrating human rights into daily business practices.

SCB^x