

SCB^x

SCB^x Group
**HUMAN RIGHTS
POLICY**



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Our Sustainability Mission

**OPPORTUNITIES
FOR EVERYONE,
POSSIBILITIES
EVERYDAY**

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SCBX GROUP

HUMAN RIGHTS POLICY

1. Rationale

SCB X Public Company Limited ("The Company"), as the parent company of SCBX financial group (the "SCBX Group"), firmly recognizes that all human beings are entitled to equal rights and dignity, and should accordingly be treated equally and without discrimination. SCBX Group is also aware that its business operations may cause or contribute to human rights risks and impacts affecting individuals or groups, both directly and indirectly.

SCBX has established this Human Rights Policy to serve as a framework for conducting business with respect to human rights, alongside the identification, assessment, and appropriate management of human rights risks, integrated into the Environmental, Social and Governance (ESG) risk management process and SCBX Group's enterprise risk management framework. This is intended to prevent and mitigate potential human rights impacts, taking into account the business context, potential impacts on stakeholders, and relevant human rights standards.

2. Scope

This Human Rights Policy applies to the business operations of SCBX Group, which includes SCBX Public Company Limited, its subsidiaries, associated companies and joint ventures over which the Company exercises operational control (hereinafter, subsidiaries, associated companies, and joint ventures over which SCBX exercises operational control shall be collectively referred to as "Group Companies"). The Policy also covers the Board of Directors, executives, and all employees of SCBX Group. Group Companies may adopt the principles of this Policy as appropriate and in a manner consistent with their respective business contexts.

In addition, the Company expects and encourages Business Partners, Suppliers, and Contractors to conduct their business with respect to human rights and to adopt principles consistent with this Policy, as appropriate, in order to support responsible business conduct throughout the value chain.

3. Governance

SCBX Group has established governance over the implementation of this Policy and the management of human rights risks, in accordance with the provisions set out in SCBX Group's Sustainability Policy and ESG Risk Management Policy.

4. Commitment

SCBX Group is committed to conducting its business with respect for human rights, complying with applicable laws and [SCBX Group Code of Conduct](#), and adhering to relevant international human rights principles and standards, such as the United Nations Guiding Principles on Business and Human Rights (UNGPs), the UN Global Compact's human rights principles, and internationally

recognized human rights as set out in the International Bill of Human Rights¹ and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. In addition, SCBX places importance on respect for the rights of vulnerable groups, in particular women's rights and children's rights, in accordance with applicable laws and international standards.²

5. Management Guidelines

SCBX places importance on the appropriate management of human rights issues through its business code of conduct, policies, and related practices, and by integrating human rights risks into SCBX Group's risk management process. The management guidelines are as follows:

- **Human Rights Due Diligence:** Conduct a comprehensive human rights due diligence process to identify and assess potential human rights risks and impacts, establish measures to prevent and mitigate such impacts, monitor the effectiveness of actions taken, and communicate performance results as appropriate.
- **Engagement:** Seek input from and engage relevant stakeholders, particularly groups that may be affected by business operations, to inform the identification and assessment of human rights risks and impacts, and to support the continuous improvement of policies and human rights risk management guidelines. **Communications:** Communicate human rights information clearly and transparently, while raising awareness of respect for human rights among employees, business partners, customers, and suppliers, and disclosing human rights performance annually through SCBX's disclosure channels.
- **Remedy and Grievance:** Establish mechanisms to receive and consider human rights grievances, and to determine appropriate remedial measures in accordance with applicable laws and standards.

SCBX sets out the following human rights practices with respect to various stakeholders:

5.1 Employees

SCBX Group places importance on respecting employees' rights and ensuring appropriate labour practices. It seeks to promote a working environment that is safe, fair, respectful of diversity, equal, and non-discriminatory, and to support employees' quality of life and well-being. The practices are as follows:

- **Employment:** Set working hours and employment conditions in compliance with labour laws and related legislation, and determine fair compensation that takes into account performance, skills, experience, duties and responsibilities, as well as principles of equality and non-discrimination. SCBX Group does not use or support illegal employment, human trafficking, forced labour, or child labour in ways that contravene applicable laws and standards.
- **Equal Opportunity:** Treat all employees equally, fairly, and with respect for human dignity, and maintain a zero-tolerance stance towards harassment, intimidation, and discrimination in any form, whether on the basis of race, color, sex, gender identity, sexual

¹ International Bill of Human Rights includes Universal Declaration on Human Rights (UDHR), International Covenant on Economic, Social and Cultural Rights (ICESCR), and International Covenant on Civil and Political Rights (ICCPR)

² Key principles and standards include the United Nations Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), the United Nations Convention on the Rights of the Child (CRC), and the Children's Rights and Business Principles (CRBP).

orientation, age, language, religion, ethnicity, education, marital status, pregnancy, disability, political opinion, or social status, or any other status protected by law. This applies throughout recruitment and employment, work assignment, promotion, development and training, compensation practices, and termination of employment.

- **Occupational Health and Safety:** Promote a clean, safe, and hygienic working environment, and implement appropriate measures to reduce risks that may affect employees' health, safety, and well-being.
- **Freedom of Association and Collective Bargaining:** Respect the employees' rights and freedoms to associate, organize, and engage in collective bargaining in accordance with applicable laws.
- **Privacy and Personal Data Protection:** Respect employees' rights to privacy, and collect, gather, use, disclose, and protect employees' personal data confidentially, without using such data for other purposes, in line with policies and practices on personal data protection and the Personal Data Protection Act.

5.2 Customers

SCBX Group is committed to customer-centric business conduct and to respecting customers' rights and treating customers fairly. It recognizes customers' basic rights, namely: (1) the right to receive accurate information; (2) the right to freely choose financial products and services; (3) the right to lodge complaints for fair treatment; and (4) the right to receive compensation where damage occurs. Practice relating to respect for customers' rights is as follows:

- **Privacy and Information Security:** Respect customers' right to privacy and place importance on protecting personal data and ensuring information security, in compliance with applicable laws, policies, and standards.
- **Non-Discrimination and Inclusion:** Treat customers fairly and avoid unfair discrimination, while promoting access to financial products and services that are appropriate to the needs and constraints of diverse customer groups, including those with limited access to financial services and vulnerable groups³, subject to relevant criteria, conditions, and risk management. SCBX Group also promotes financial knowledge and skills to support sound financial decision-making and appropriate debt management.
- **Market Conduct and Responsible Lending:** Comply with laws, guidelines, regulations, and standards relating to fair customer treatment and responsible and fair lending, including providing information that is accurate, complete, clear, and sufficient for customers' decision-making.
- **Fraud and Scam Prevention:** Implement appropriate measures to reduce risks of financial and digital fraud and scams and promote knowledge and awareness among customers to help them recognize risks and conduct financial transactions safely.
- **Responsible Finance and Investment:** Establish guidelines for assessing ESG risks related to lending and investment, including businesses or activities that Group companies will not financially support (Exclusion List), sector-specific guidelines for high-risk industries, and the application of the Equator Principles (EPs) to identify, assess, and manage environmental and social risks and impacts when providing financial support for large-scale projects and corporate loans for large projects. This includes consideration of relevant human rights risk issues, such as community rights, labour rights, and indigenous peoples' rights, in line with

³ "Vulnerable groups" refers to individuals or groups who may be at greater risk of human rights impacts than others, or who face constraints in accessing rights, opportunities, services, or remedies due to various factors or contexts. This may include low-income persons, older persons, children, women, persons with disabilities, migrant workers, ethnic minorities, persons of diverse sexual orientations and gender identities, and other groups that may be in vulnerable situations depending on the context.

project context and EP criteria. For credit transactions outside the scope of the EPs, an ESG risk assessment process will be applied to identify and determine management approaches for significant human rights risks, and to monitor material human rights-related risks through discussions with customers and the customer review process.

5.3 Suppliers and Contractors

SCBX Group places importance on procurement processes that are transparent, fair, and aligned with relevant criteria. Suppliers and contractors are considered and selected according to appropriately defined criteria and processes, based on transparency, fair competition and equal treatment.

In addition, SCBX Group promotes responsible business conduct in the supply chain by setting out [SCBX Group Supplier Code of Conduct](#) to communicate principles and expectations for suppliers and contractors to operate ethically and responsibly, in compliance with applicable laws and standards. This covers respect for human rights, fair labour practices, appropriate working conditions, occupational health and safety, environmental responsibility, as well as non-discrimination and the prohibition of forced labour, child labour, and human trafficking. Relevant suppliers and contractors must acknowledge and strictly comply with this code of conduct in accordance with SCBX Group's prescribed criteria and processes.

5.4 Business Partners

SCBX Group places importance on conducting business relationships with business partners in a fair, transparent manner, respecting the rights of relevant individuals, avoiding unfair discrimination, and taking into account the protection of privacy and personal data in accordance with applicable laws and practices.

In addition, SCBX Group encourages business partners to conduct their businesses responsibly and with respect for human rights, considering potential impacts on customers, employees, and other relevant stakeholders, and complying with laws and requirements relating to respect for human rights.

SCBX Group has established mechanisms to receive complaints, information, and tips regarding non-compliance with laws, regulations, codes of conduct, and SCBX Group's human rights policy, including human rights issues or impacts, through various channels such as email, telephone, mail, customer service centers, and branch networks. Protective measures are in place for complainants, whistleblowers, and individuals who provide information in good faith, in accordance with relevant criteria. For significant human rights complaints or issues that may give rise to serious impacts, the Sustainability Function and relevant functions of SCBX and Group companies will investigate and determine management approaches in line with prescribed processes, and report promptly to senior management, the Sustainability Committee, and other relevant committees as appropriate.

SCBX Group further seeks to enhance knowledge, awareness, and understanding of human rights among directors, executives, and employees, as appropriate to their roles and responsibilities, through communications, education, and training. This supports the integration of human rights considerations into business operations, particularly in processes where such risks may arise.

6. Policy Review

This Human Rights Policy has been approved by the Board of Directors and shall be reviewed at least once a year, or when there are changes that may affect the substance of the Policy.

In the case of significant policy amendments, the Sustainability Function must submit the proposed amendments to the Management Committee for consideration, comments, and recommendations. Where such amendments may have a significant impact on the business, they shall first be submitted to the Executive Committee for consideration, comments, and recommendations, before being presented to the Sustainability Committee for endorsement and then to the Board of Directors for approval, in sequence.

In the case of non-significant policy amendments, the Sustainability Committee is authorized to approve such amendments pursuant to the authority delegated by the Board of Directors and shall report such policy amendments to the Board of Directors for acknowledgement.

7. Related Policies

- Sustainability Policy
- Environmental, Social and Governance (ESG) Risk Management Policy
- SCBX Group Code of Conduct
- Supplier Code of Conduct
- Privacy Policy
- Occupational Health and Safety Policy



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