

Human Rights Due Diligence Report 2025

Kiatnakin Phatra Financial Group (KKPFG)

Kiatnakin Phatra Financial Group ('the Group') has developed its human rights principles based on the framework of Thai labour and human rights laws, the UN Guiding Principles on Business and Human Rights (UNGPs), and the Principles for Responsible Banking (PRB). Accordingly, the Group has established a comprehensive Human Rights Due Diligence (HRDD) process to monitor and safeguard human rights through the following procedures.

1. Scope of Human Rights Due Diligence

The scope of the HRDD process is defined in alignment with KKPFG Human Rights Policy, which was approved by the Board of Directors. The Policy identifies three primary stakeholder groups, each included in the HRDD framework:

- **Employees or Workers:** All permanent and temporary employees of the Group, including branch staff. Employees of external service providers (outsourced staff) are excluded.
- **Suppliers or Business Partners:** All vendors, contractors, or service providers directly engaged by the Group, as well as business partners of its entities.
- **Clients or Customers:** Both retail and corporate clients of the Group.

For 2025, the HRDD scope primarily focuses on KKP Bank, covering all three stakeholder groups. Other entities — KKP Tower, KKPS, KKPAM, and KKP Dime — are included on a reduced basis, with limited stakeholder coverage (see Table 1).

Additional clarifications for the 2025 assessment:

- **Suppliers or Business Partners:** Limited to suppliers directly engaged with KKP Bank and KKP Tower. This excludes the Group's business partners and suppliers of the other subsidiaries.
- **Clients or Customers:** Applies only to KKP Bank clients. Retail coverage includes those accessing services via 53 branches, while corporate coverage includes clients served by the Corporate Banking and Lending departments.

Table 1: Scope of the 2025 HRDD -- Stakeholder Coverage by the Group's Entities

		Key Stakeholders			
		Employees or Workers	Suppliers or Business Partners	Clients or Customers	
				Retail	Corporate
KKPFG	KKP Bank	✓	✓	✓	✓
	KKP Tower	✓	✓	-	-
	Other Subsidiaries	✓	-	-	-

2. Human Rights Risk Assessment

The Group conducts human rights risk assessments to identify and address potential impacts across its operations and value chain. The assessment process includes a review of internal systems and stakeholder perspectives (Section 2.1), applies a structured risk classification framework (Section 2.2), and reports the identified issues and insights from the 2025 assessment (Section 2.3).

2.1 Assessment Approach

The human rights risk assessment combined two key components:

1) Internal Assessment

A review of existing policies, procedures, and oversight mechanisms relating to human rights. It included an evaluation of preventive and remedial measures, as well as any reported incidents, across areas such as labour rights, equal opportunity, health and safety, and data privacy.

2) Stakeholder Engagement

An anonymous survey gathered stakeholder perspectives on three dimensions: Awareness of the Group's Human Rights Policy, experiences of potential violations, and understanding of grievance channels. The survey was designed to achieve a 95% confidence level across the three main stakeholder groups. For internal staff, 587 responses were received from approximately 4,000 employees. KKP Bank also received responses from 590 retail clients across 53 branches, and 190 corporate clients out of more than 400 companies overall under Corporate Banking. In addition, 33 directly contracted suppliers with significant and ongoing engagement with KKP Bank and KKP Tower participated.

2.2 Risk Categorisation

A Traffic Light System is used to categorise the level of human rights risks based on the severity of potential impacts and the likelihood of occurrence, as follows.

- **Red** Cases of human rights violations detected, such as the use of illegal labour, sexual harassment, and fatalities resulting from unsafe working conditions.
- **Amber** Risks at a moderate level, which could seriously affect business operations if not addressed, such as discrimination, breaches of sensitive personal data¹, and workplace injuries arising from unsafe conditions.
- **Yellow** Risks at a lower level, which may still affect business operations if unmanaged, such as favouritism, breaches of non-sensitive personal data, and verbal harassment.
- **Green** No human rights risks were identified during the assessment period.

2.3 Risk Assessment Results

No human rights violations (●) or moderate risks (●) were identified. However, four human rights issues were assessed as low risk (●), as shown in Table 2 by stakeholder group.

- 1) **Labour Rights Risk** was identified within the employee group, where unclear shift management created the perception of unpaid or forced overtime among some staff.
- 2) **Fair Treatment Risk** was identified in relation to fair customer service (market conduct). This includes instances where customers may not have received complete product information, or where internal communication to employees on the importance of fair service delivery was insufficient.
- 3) **Health and Safety Risk** was also identified within the employee group, where partial obstruction of fire exits at an office location posed a potential workplace safety hazard.
- 4) **Data Privacy Risk** was identified across all three stakeholder groups. This includes risks from the Group's potential failure to safeguard employee data, the possibility that suppliers may not adequately protect their employees' or customers' data, and the risk of insufficient protection of customer data by the Group.

¹ such as race, religion, sexual orientation, and biometric data.

Table 2: Results of the Human Rights Risk Assessment by Stakeholder Group

Salient Issues / Stakeholders	Employees or	Suppliers or	Clients or
	Workers	Business Partners	Customers
Labour Rights	●	●	●*
Equal Opportunity	●	●	●
Fair Treatment	●	●	●
Fair Wage	●	-	-
Training & Development	●	-	-
Health & Safety	●	●	-
Data Privacy	●	●	●

Remark: * Applicable to corporate clients only.

- Not applicable to this stakeholder group in 2025 scope.

In addition, while the survey indicated strong awareness of the Group's Human Rights Policy, knowledge of grievance mechanisms remained moderate — particularly among employees and suppliers. Awareness among corporate clients of how human rights considerations are integrated into lending processes was also limited.

3. Risk Mitigation and Preventive Measures

The Group's human rights risk assessment concluded that overall risks and potential impacts were low and considered acceptable. Nonetheless, targeted measures have been implemented to address the specific low-risk issues identified, while broader oversight and awareness activities are maintained to ensure long-term risk prevention and control.

Addressing Identified Issues

- **Labour Rights:** Relevant business units were instructed to clarify shift scheduling procedures, ensure full compliance with wage and benefit entitlements, and strengthen related communication protocols.
- **Fair Treatment (Market Conduct):** Refresher training was provided to client-facing staff to reinforce fair and responsible communication standards across all products and service channels.
- **Health and Safety:** Relevant business units were directed to conduct stricter patrols and regular monitoring to ensure that fire exits remain unobstructed at all times.

- **Data Privacy:** Relevant business units, including Transaction Banking and Operations, that liaise with suppliers, have been engaged to strengthen personal data protection measures. This includes establishing clear data classifications and confidentiality levels.

Ongoing Oversight and Awareness

- **Employee Awareness:** Awareness is promoted through internal communication and training, such as the annual ESG & Sustainability refresher course, which includes topics like “Examples of Irresponsible Business Practices”.
- **Audit and Monitoring:** The Internal Audit Department, acting as the Third Line of Defence, reviews human rights-related processes to assess the adequacy of controls and mitigation measures across all relevant human rights issues.

4. Monitoring and Review

The Group’s Board of Directors has assigned the Sustainability Sub-Committee (ESGC) to oversee the HRDD process. The ESGC is responsible for approving the results of the human rights risk assessment (as presented in Section 2), monitoring the implementation of control and preventive measures (as outlined in Section 3), and reporting to the Board of Directors. Reviews of the human rights risk assessment are conducted on an annual basis, or earlier in the event of material changes to the Group’s Human Rights Policy.

5. Remediation Mechanisms

In the event that the Group violates human rights laws and causes adverse impacts, it follows the Human Rights Policy by providing remediation to affected parties in a fair and transparent manner. Access to the remediation process is available through the Group’s established whistleblowing and grievance channels, in accordance with the Whistleblowing Policy.

The Group is committed to safeguarding confidentiality and ensuring that individuals who report in good faith are protected from retaliation. In addition, the Group actively promotes awareness of whistleblowing channels and continues to enhance the accessibility and effectiveness of grievance mechanisms for all stakeholders.