

## Respect for Human Rights

### Our commitment

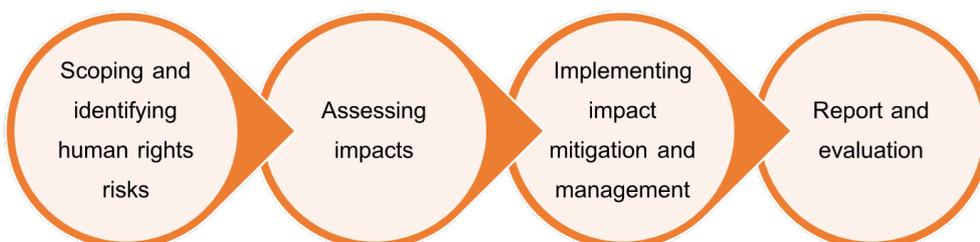
Respect for human rights is an essential part of B.Grimm Power’s responsibility. We strive to respect and promote human rights of our employees, our value chain, and the communities in which we operate. To ensure that we are doing so, B.Grimm Power developed our [Human Rights Policy](#), in accordance with the international principles and standards i.e. Universal Declaration of Human Rights, United Nations Global Compact, United Nations Guiding Principles on Business and Human Rights, and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights.

### Human Rights Due Diligence

B.Grimm Power performs Human Rights Due Diligence every three years, aiming to identify, prevent and mitigate the potential human rights impacts proactively and systematically, and covering all employees in our own operations, business value chain, and extending to suppliers, customers, local communities and vulnerable groups (i.e. women, children, indigenous people, migrant labour, third party labour, disabled people, pregnant women and LGBTQI+). The process has been developed in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs), consisting of Policy commitment, Risk and Impact Assessment, Integration and Internal Management, Monitoring and Reporting, and Remediation.

Policy Commitment	Risk & Impact Assessment	Integration & Internal Management	Monitoring & Reporting	Remediation
Announce Human Rights Policy, Supplier Code of Conduct, and Non-Discrimination and Anti-Harassment Commitment	Assess and analysis of actual and potential human rights impacts every three years	Integrate findings to activities and ensure effective implementation	Regularly monitor and report on human rights performance	Remediate adverse human rights impacts

The Human Rights Risks and Impact Assessment has been developed based on the United Nations Guiding Principles (UNGPs) on Business and Human Rights as follow:



For scoping and identifying human rights risks, we identify actual and potential human rights risks associated with our business activities throughout the value chain, including new businesses relations i.e. mergers and acquisition, and joint ventures. Following that, we map the risks with the rights holders affected from the identified risks issues, including vulnerable groups. These include a desktop review on potential human rights risks in energy sectors (peers benchmarking), human rights risks based on geography, and international guidelines.

The actual and potential human rights issues are considered in risk identification process, covering forced labor, human trafficking, child labor, freedom of association, rights to collective bargaining, and discrimination and harassment in any forms.

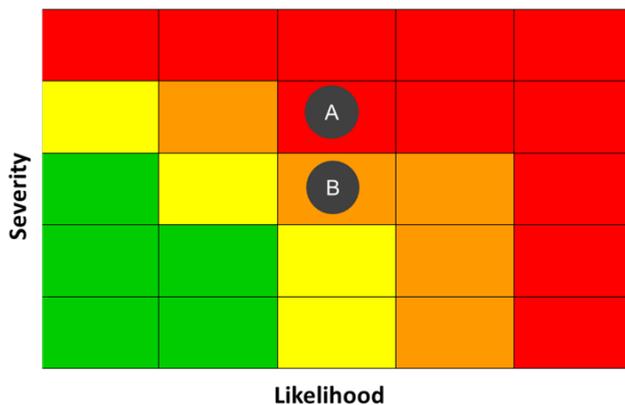
Employee practices	Community rights & Environment	Supply chain management	Customer rights
<ul style="list-style-type: none"> <li>• Safe and healthy working conditions</li> <li>• Non-discrimination</li> <li>• Freedom of association, and collective bargaining</li> </ul>	<ul style="list-style-type: none"> <li>• Standards of living and community health</li> <li>• Land acquisition</li> <li>• Water security</li> <li>• Impact of pollution, and hazardous waste</li> </ul>	<ul style="list-style-type: none"> <li>• Safe and healthy working conditions</li> <li>• Illegal forms of labours e.g. child labour, migrant workers, human trafficking, and forced labour</li> </ul>	<ul style="list-style-type: none"> <li>• Customer health and safety</li> <li>• Customer data privacy protection</li> </ul>

The assessment is conducted by analysing the significance of the human rights issues regarding its severity and likelihood as follows

Severity	Scale	Scope	Irremediable nature
Very high	Significant impact to health and safety including fatality or disability	Impact to all people in particular stakeholder group	Impossible to restore the impact
High	High impact to health and safety including serious injury which requires rehabilitation (>3 days loss time injury)	Impact to most people in particular stakeholder group	> 5 years to restore the impact
Medium	Moderate impact to health and safety including injury which requires rehabilitation (1-3 days loss time injury)	Impact to groups of people particular stakeholder group	3-5 years to restore the impact
Low	Low impact to health and safety including or minor injury or illness (no loss time injury)	Impact to some people in particular stakeholder group	1-3 years to restore the impact
Very low	Minor impact to health and safety (First aid case)	No negative impact to stakeholders	< 1 year to restore the impact

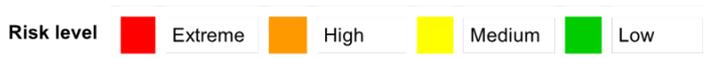
Likelihood	
Very likely	Occurs all the time – Human rights issues have occurred consistently from the past unit present (every year)
Likely	Occurs very often - Human rights issues have occurred in the past and occurred very often at the present (once every 1-3 years)
Moderate	Occurs moderately - Human rights issues have occurred in the past and occurred sometimes at the present, depending on operation of business units (once every 3-5 years)
Unlikely	Occurs rarely - Human rights issues have occurred in the past and occurred to occasionally at the present, depending on operation of business units (once every 5-10 years)
Very unlikely	Almost never – Human rights issues have never occurred in our operation but occurred to other companies within the same industry (once in more than 10 years or never)

Primarily, we conduct inherit risks assessment, followed by considering our existing measures for each risk to identify residual risks. We then prioritise human rights salient risks, which consist of the residual risks at extreme and/or high level.



**Our salient human rights issues**

- A: Health and safety of employees at power plants
- B: Contractors’ health and safety



Human rights issues	Description	Activity at risk	Stakeholders	Mitigation and remediation actions
A: Health and safety of employees at power plants	Accidents occur to workers during operation at the power plant	Operation	Employees who on construction and maintenance at new and existing sites	<ul style="list-style-type: none"> <li>• Develop health and safety manual for working at power plants</li> <li>• Perform job risk assessment and enforce appropriate job safety principles</li> <li>• Regular health and safety trainings for all employees at power plants</li> <li>• Measures for Personal Protective Equipment (PPE)</li> <li>• Perform Safety Talk” which give examples of accidents happened in the past, and preventive measures</li> </ul>

Human rights issues	Description	Activity at risk	Stakeholders	Mitigation and remediation actions
B: Contractor Health and Safety	Workers have experienced with accidents by high voltage electricity while working on the electric pole	Construction	Supplier, contractor and sub-contractors' workers, working on construction and maintenance services at new and existing sites	<ul style="list-style-type: none"> <li>• Conduct supplier audit, integrating health and safety into supplier checklist and plan to engage with suppliers to share the best practices</li> <li>• Perform job risk assessment and enforce appropriate job safety principles</li> <li>• Set up work manual and safety trainings for suppliers</li> <li>• Perform Safety Talk" which give examples of accidents happened in the past, and preventive measures</li> </ul>

Scope	Human rights assessment and mitigation in 2020
Own operations	<ul style="list-style-type: none"> <li>• 100% of sites assessed (56 sites)</li> <li>• 44.6% of sites assessed were identified with high human rights risks (25 sites)</li> <li>• 100% of high risks sites with mitigation plan and remediation measures implemented (25 sites)</li> </ul>
Tier 1 suppliers	<ul style="list-style-type: none"> <li>• 100% of tier 1 suppliers were assessed (1,278 suppliers)</li> <li>• 0% of tier 1 suppliers were identified with high human rights risks</li> <li>• 100% of tier 1 suppliers with mitigation plan and remediation measures implemented</li> </ul>
Joint ventures	<ul style="list-style-type: none"> <li>• 100% of sites assessed (7 sites)</li> <li>• 14.3% of sites assessed were identified with high human rights risks (1 site)</li> <li>• 100% of high risks sites with mitigation plan and remediation measures implemented (1 site)</li> </ul>

### Remediation Actions

B.Grimm Power provides channels for stakeholders, whether employees or external stakeholders, to report any concerns, including human rights to Whistleblowing office via [whistle-blowing@bgrimpower.com](mailto:whistle-blowing@bgrimpower.com). Through the grievance procedure, we will conduct a prompt, impartial and extensive investigation of grievance. The report will be treated as confidential to the extent possible. For more information about the grievance policy, please visit [Whistleblowing and Grievance Policy](#). B.Grimm Power have prepared the remediating actions to restore affected right holders that have been harmed by our business activities. The company defined any types of remedy that shall amend the harm caused, the outcomes are able to be a range of forms such as apologies, restitution, rehabilitation, financial or non-financial compensation, punitive sanctions, and the prevention of harm.

In 2020, there was no human rights violations cases. Therefore, there were no specific remediation actions taken. To reiterate our commitment to respect human rights for all stakeholders, we will continue to regularly assess and actively monitor human rights risks and impacts, which ensures appropriate mitigation measures both in our operation and those in our value chain.