

# **HUMAN RIGHTS POLICY**

**Version 1.0**

**<Document Reference>**

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**Contact**

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## ABBREVIATIONS AND DEFINITIONS

Abbreviation/ Term	Description
BE	Business Enabler(s) as support unit responsible for handling related operations and supporting function within the business domain
Board	CIMB Thai's Board of Directors
BU	Business Unit(s) as revenue-generating business function
Business Relations	Any client/customer, investee, employee, supplier/vendor/outsourcing partner, corporate responsibility or other business partner, or employee. Refer to 1.3(b) for definitions
CIMB Group/ Group/	CIMB Group Holdings Berhad and its subsidiaries in Malaysia and in other jurisdictions
CIMBT	CIMB Thai Bank Public Company Limited
GS	Group Sustainability Department
GSGC	Group Sustainability and Governance Committee
Policy	Human Rights Policy
UN	United Nations

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# 1. POLICY GOVERNANCE SUMMARY

## 1.1. PURPOSE

As part of a leading universal banking group and corporate citizen in ASEAN, CIMBT is committed to building a high performing sustainable organisation to help advance customers and society. We recognise that we have a responsibility to protect, respect and advance human rights across our value chain.

The main objective of the CIMBT Human Rights Policy (“Policy”) is to provide clarity and transparency around how human rights risks are to be managed in a manner consistent with the Bank’s Enterprise-Wide Risk Framework, Sustainability Policy, and other internal / external expectations, including legal and regulatory obligations, and voluntary commitments which require protection of, or respect for, human rights.

Ultimate responsibility for human rights at CIMBT is with the Board of Directors. At the management level, the CIMBT Management Committee is responsible for human rights risk, which is managed as a key element of Sustainability Risk at CIMBT.

## 1.2. RISK ADDRESSED (LEVEL 1/ 2/ 3) (MAIN RISK/ SUB-RISK/SPECIFIC RISK)

At CIMB Group, we define Human Rights risk as:

“Risk arising from the Bank’s role as a financier, employer, purchaser, investor, service provider, operator, advisor, business partner, sponsor, or a corporate donor due to a breach of human rights, which are basic rights that allow individuals the freedom to lead a dignified life, free from fear or want, and free to express independent beliefs. These rights apply equally and universally in all countries. Human rights risk may manifest in different forms of violations such as human trafficking, modern slavery, forced or debt bonded labour, child labour, poor working conditions, forced or involuntary displacement of indigenous communities, amongst others.”

Falling broadly under the umbrella of Social Risk umbrella, Human Rights Risk is a cross-cutting social risk that may arise when CIMBT undertakes its business and operations in its capacity as a

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lender / financier, investor, service provider, purchaser, operator, advisor, business partner, sponsor, corporate donor, or as an employer. Failure to anticipate and manage related risks can have multiple consequences, including financial, legal and reputational impact.

Although Human Rights cover a broad range of areas, this Policy focuses on issues and risks that are most pertinent to CIMBT's operations and activities. Due to the cross-cutting nature of human rights, related considerations are also embedded into other Sustainability Risk areas as shown in the table below, with related specific policies (laid out in Section 1.5b) which adopt and integrate the human rights principles contained in this Policy.

<b>Main Risk (Level 1)</b>	<b>Sub-Risk (Level 2)</b>	<b>Specific Risk (Level 3)</b>
Sustainability Risk	Social Risk	Employee Health & Safety Rules Events Risk*
		Employee Wellbeing Risk
		Employee Diversity and Inclusion Risk
		<b>Human Rights Risk</b>
		Corporate Social Responsibility Risk
	Economic /Ethical Risk	Employee Conduct Risk*
		Sustainable Financing Risk
		Financial Inclusion Risk
		Sustainable Procurement Risk
		Treating Customer Fairly Risk**

\* For reference only. Although this is a component under Sustainability Risk, this specific risk type is defined under Operational Risk in the CIMB Group Risk Library.

\*\* For reference only. Although this is a component under Sustainability Risk, this specific risk type is defined under Reputational Risk in the CIMB Group Risk Library.

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**1.3. SCOPE**

- (a) This Policy applies to
  - i. All Business Units (including all products and services provided), Business Enablers and geographies across CIMBT (to the extent applicable); and
  - ii. All Entities based on the categories assigned to them in accordance with the Entity Governance Policy.
  
- (b) This Policy applies to CIMBT's own operations and in our business dealings with the following key business relations:
  - i. Clients or customers, where CIMBT is a financial services provider;
  - ii. Suppliers, vendors and outsourcing partners, where CIMBT is a customer or purchaser;
  - iii. Joint venture or other partners, where CIMBT is a partner;
  - iv. Investees, where CIMBT is a strategic investor;
  - v. Employees, where CIMBT is an employer; and
  - vi. Corporate Responsibility Programme partners or grantees, where CIMBT is a supporter.
  
- (c) The Policy will be implemented in stages in accordance with the maturity and complexity and risk exposure of the business, the level of readiness within CIMBT, and the regulatory and business landscape where CIMBT operates in.

**1.4. DISPENSATION**

- a) Sustainability Team shall review and evaluate all dispensation requests before providing a recommendation to the Management Committee.
- b) Approval for all other dispensations must be obtained from the Management Committee.
- c) Refer to CIMBT Sustainability Policy and CIMBT Sustainable Financing Policy on dispensation.

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**1.5. GOVERNANCE**

- (a) This Policy and all changes made to this Policy must be endorsed and approved by the following:
  - i. Endorsed by the Risk Management Committee (RMC);
  - ii. Approved by Board of CIMB Thai (Board);



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## **2. POLICY**

### **2.1. OBJECTIVE**

The objectives of this Policy are as follows:

- (a) Establish the key minimum requirements in managing human rights risks within CIMBT; and
- (b) Ensure Board approved requirements and expectations in terms of human rights are articulated, communicated and monitored for compliance.

To ensure a common understanding of human rights, we have outline the definitions of key human rights documents that guides our policy

**Definitions**

(a) In line with the United Nations Environmental Programme Finance Initiative (UNEP FI), CIMB Thai identifies Human Rights as “basic rights that allow individuals the freedom to lead a dignified life, free from fear or want, and free to express independent beliefs.” These rights apply equally and universally in all countries. There are three key definitions referred to in this Policy:

**(i) International Bill of Human Rights**

The International Bill of Human Rights comprise of the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights. These core human rights treaties of the United Nations seeks to advance fundamental freedoms and to protect the basic human rights of all people. These include:

- The right to life, liberty and security of person
- The right to freedom from torture and slavery
- The right to recognition and equality before the law
- The right to freedom of thought, conscience and religion
- The right to freedom of peaceful assembly and association
- The right to property
- The right to decent work
- The right to rest and leisure

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- The right to an adequate standard of living

**(ii) United Nations Guiding Principles of Businesses and Human Rights**

UN Guiding Principles of Businesses and Human Rights (UNGP) are a set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations. The Guiding Principles contain three chapters, or pillars, namely: protect, respect and remedy. Each defines concrete, actionable steps for governments and companies to meet their respective duties and responsibilities to prevent human rights abuses in company operations and provide remedies if such abuses take place.

**(iii) International Labour Organisation Conventions**

The International Labour Organisation (ILO) has identified seventeen core conventions covering principles and rights at work. These are part of the Framework of human rights:

- Forced Labour Convention, 1930 (No. 29)
- Abolition of Forced Labour Convention, 1957 (No. 105)
- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labour Convention, 1999 (No. 182)
- Equal Remuneration Convention, 1951 (No. 100)
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187)
- Employment Policy Convention, 1964 (No. 122)
- Weekly Rest (Industry) Convention, 1921 (No. 14)
- Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19)
- Final Articles Revision Convention, 1946 (No. 80)
- Employment Service Convention, 1948 (No. 88)
- Final Articles Revision Convention, 1961 (No. 116)
- Maximum Weight Convention, 1967 (No. 127)
- Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No. 159)
- Maritime Labour Convention, 2006 (MLC, 2006)
- Work in Fishing Convention, 2007 (No. 188)

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- (b) For the purposes of this policy, modern slavery is a form of forced labour which occurs when a person holds another person in slavery or servitude, requires or forces the person to perform compulsory labour, or also engages in other related forms of workplace abuse, and severe exploitation for personal or commercial gain.

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**2.2. POLICY STATEMENTS**

This Policy lays out our commitments, principles and approaches to respecting human rights. This Policy provides guidance on identifying, assessing and managing salient human rights risks which present the most severe potential negative impacts. In this context, salience uses the lens of risk to people, not the business, as the starting point, while recognising that where risks to human rights are greatest, this also poses significant risk to business.

**2.2.1 COMMITMENTS**

- (a) CIMBT commits to uphold and comply with the following international human rights laws and standards:
  - i. The International Bill of Human Rights, including the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights;
  - ii. UN Guiding Principles on Business and Human Rights, particularly the “Protect, Respect, or Remedy” Framework; and
  - iii. International Labour Organisation Declaration on Principles and Rights at Work.
  
- (b) With regard to Labour Rights, we commit to:
  - i. Avoid causing or contributing to Labour Rights violations;
  - ii. Respect the rights of our employees, including:
    - (a) freedom of representation;
    - (b) right to collective bargaining;
    - (c) a safe and healthy work environment;
    - (d) fair recruitment and other people practices;
    - (e) preventing modern slavery; and
    - (f) respecting regulations on minimum wage and maximum working hours.
  - iii. Eliminate discrimination in the workplace, and promote diversity and inclusion

These commitments are underpinned by CIMBT’s Sustainability principles which are laid out in CIMBT Sustainability Policy, adopting principles and recommendations laid out in recognised international, regional and local frameworks in a manner consistent with the size, scale, and complexity of our business and risk profile. These include the UN

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Environment Programme Finance Initiative Principles for Responsible Banking, UN Sustainable Development Goals.

- (c) In the event that prevailing local laws conflict with International Human Rights obligations as defined in Section 1.1 above, CIMBT shall identify and engage with stakeholders to explore approaches that respects international rights standards and principles.

**2.2.2 PRINCIPLES AND APPROACH**

CIMBT's approach to human rights is guided by the following principles:

- (a) We respect and uphold human rights and seek to **identify, prevent, mitigate** adverse human rights impacts which may arise through our activities or business relations including clients or customers; suppliers, vendors and outsourcing partners; joint venture or other partners; strategic investments; employees; and Corporate Responsibility Programme partners or grantees.
- (b) We will take a **proactive approach to integrating human rights considerations** into our decision-making processes such as lending, investments, procurement, and operations, taking steps to avoid causing or contributing to human rights infringements.
- (c) We will take a **risk-based approach to assess actual and potential human rights impacts** across CIMBT, recognising that it is important to focus on the impacts of people and not just our business.
- (d) We will **take appropriate action** to mitigate adverse human rights impacts in our own operations, and those we enable in our business relations, including **providing for or cooperating in remediation** in line with our responsibility.
- (e) We will take a holistic approach to our policies and business decisions, in particularly with regard to safeguarding human rights in our sustainability policies, where we **strive for a just transition** in our efforts to mitigate climate change.
- (f) We will **track the effectiveness of our actions**.

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(g) We will **be transparent about our human rights impacts** and communicate how we fulfil our responsibility to respect human rights.

(h) We will **engage actively and openly with our business relations**, including our employees, with the objective of achieving greater awareness and improvement of human rights practices.

**2.2.3 DUE DILIGENCE**

(a) CIMBT commits to continuous human rights due diligence to identify, prevent, and mitigate adverse human rights impacts identified across the Bank. This is done on a risk-based approach, with the greatest attention paid to the areas of greatest risk to the Bank, and most salient impacts on people, and in particular, vulnerable groups.

(b) Human rights due diligence will be conducted through various appropriate methods and channels, including:

- i. In our own operations, via peer benchmarking of industry risks and issues raised by civil society and NGOs, and engagement with stakeholder groups;
- ii. With our employees, via direct consultation, focus groups and surveys, as well as through representative organisations;

iii. As a financier and financial services provider,

- (a) Via Basic Sustainability Due Diligence by Business Unit front liners, and Enhanced Sustainability Due Diligence by Sustainability Team for clients identified as exposed to high levels of risk, as laid out in CIMBT’s Sustainability Policy, Sustainable Financing Policy. We develop Sustainability Due Diligence findings and recommendations, taking into account various available sources, including media reports, civil society groups representing local communities. Depending on the level of risk, cases may be escalated to the CIMBT Management Committee and potentially to the Board of Directors for final decision;

- (b) Under CIMBT Sustainable Financing Policy, non-individual clients are required to meet our Sector Guide requirements. In particular, we require clients in certain high risk sectors such as Palm Oil and Forestry to consult with affected communities and obtain Free, Prior and Informed Consent prior to major land use conversion projects affecting land rights and water resources. We also require clients in industries with large numbers of migrant and/or low wage workers to have in place their own human rights policy which includes due diligence, grievance mechanisms.

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- iv. With our suppliers and vendors via Sustainability Due Diligence and acknowledgement of CIMBT's Vendor Code of Conduct, as laid out in CIMBT Sustainability Policy; and  
With other partners such as our Corporate Social Responsibility Programme partners, strategic investees, and joint venture partners, via Sustainability Due Diligence as laid out in CIMBT's Sustainability Policy.
- (c) We will be guided by the UNGP to assess actual and potential adverse human rights impact, and how we may have directly caused, contributed or be linked to an abuse of rights. The assessment will also consider the scale, scope and remediability of impact.
- (d) Periodic reviews of salient human rights risks will be undertaken to account for changes in our business and our operating environment.

## **2.2.4 TAKING ACTION AND PROVIDING REMEDY**

- (a) Where we identify human rights risks within our own business activities, we will seek to put in place mechanisms to avoid and remedy adverse human rights impacts.
- (b) Where we are exposed to human rights risks through our clients and other business relations, we strive to use our leverage to influence them towards standards outlined in this policy. In particular:
  - i. In our non-individual financing activities, as per our CIMBT Sustainable Financing Policy:
    - (a) financing clients that do not meet our Sector Guide requirements, or are exposed to other salient human rights risks at the time of financing, will be engaged and if required, asked to agree to a time-bound action plan
    - (b) we track these action plans periodically through regular follow up
    - (c) in a situation where action plan targets are repeatedly missed without reasonable explanation, or where we judge human rights risks to be too high, or where we judge there to be deliberate and repeated infringements, we will seek to distance ourselves from the client within a reasonable practical timeframe;
  - ii. In our other business relationships, as per our CIMBT Sustainability Policy, where we judge human rights risks to be too high, or where we judge there to be deliberate and repeated infringements, we will seek to distance ourselves from the business relation within a reasonable and practical timeframe.

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- (c) We will establish and / or participate in grievance mechanisms for human rights (and broader issues, via both internal and external channels. These mechanisms should be accessible by our key business relations (as defined in Section 1.3 (b)), and other stakeholder groups including communities affected by bank-financed projects and activities.
- (d) We recognise our responsibility to contribute to remediation. Remedies may include apologies, restitution, rehabilitation, financial or non-financial compensation, as well as the prevention of harm.
- (e) When we discover that a human rights abuse has taken place, we will take appropriate steps to ascertain whether we have caused or contributed to the adverse human rights impact.
  - i. When we have directly caused these impacts, we are responsible for resolving the issue and providing remedy.
  - ii. Where we have contributed to an adverse human rights impact, we will provide mechanisms through which grievances can be raised and strive to contribute to remediation, where necessary and appropriate, ensuring no penalty, dismissal or reprisal.
  - iii. Where we have not caused or contributed to an adverse impact, but are directly linked to it through our products, operations or services, we recognise that we are able to play a role in remediation, for example, by engaging with our clients about their own grievance mechanisms and remediation pathway.
- (f) Where possible and appropriate, we strive to make positive impacts through our business operations and through our business relations, for example, through our products, services and communication platforms.

**2.2.5 TRACKING AND REPORTING PERFORMANCE**

- (a) CIMBT will establish a set of indicators to track our human rights performance.
- (b) We will report formally to the public on our:
  - i. Human rights objectives, governance and developments;
  - ii. Key exposures to potential areas of heightened human rights risks;
  - iii. Steps taken to mitigate these risks, and / or provide remedy in line with our responsibility where possible and appropriate; and
  - iv. Human rights performance indicators.

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(c) The report will seek to provide transparency to stakeholders on:

- i. The nature of exposures and issues that are escalated;
- ii. Sufficient governance, oversight and control to prevent adverse human rights impacts; and
- iii. Adequacy and effectiveness of our response to address human rights impacts that do happen.

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### 2.3. KEY CONTROLS

No	Policy Statement	Key Control	Control Standard	Self-Test Procedure
1	When we discover that a human rights abuse has taken place in our business relations, and those we enable, we will take appropriate steps to ascertain whether we have caused or contributed to the adverse human rights impact, and take appropriate action in line with our responsibility.	There is an established process to identify, assess, remediate (where appropriate) and report human rights violations.	Half Yearly	Review, on a sampling basis, the previous six months' Sustainability Due Diligence conducted, and confirm that instances of human rights violations are identified, our contribution and relationship to the adverse impact is identified, action is taken where appropriate, and the case is reported.
2	The Board will periodically review the adequacy and effectiveness of the CIMBT's Human Rights Policy	A review of the CIMBT's Human Rights Policy must be undertaken by the Board.	Once every two years	Confirm that the reviews take place based on meeting agenda and minutes.  Ensure key actions agreed are assigned ownership and monitored for resolution by Sustainability Team, with periodic updates to the Management Committee.

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**2.4. ROLES AND RESPONSIBILITIES**

<b>Role</b>	<b>Responsibility</b>
Sustainability Lead Thailand, with guidance from Head of Group Sustainability	<ul style="list-style-type: none"> <li>(a) Oversee adequacy and effectiveness of the policy and key controls.</li> <li>(b) Provide updates to governance committee on policy related matters, risks and areas of concern as identified from time-to-time.</li> </ul>
Sustainability TH with guidance from Group Sustainability	<ul style="list-style-type: none"> <li>(a) Drive implementation of human rights due diligence, actions, remedy, performance and reporting.</li> <li>(b) Monitor adequacy and effectiveness of the policy and key controls and provide updates to governance committee on policy related matters, risks and areas of concern as identified from time-to-time.</li> <li>(c) Monitor key regulatory developments and ensure alignment.</li> <li>(d) Review Policy dispensation requests, ensure adequate due diligence is conducted by Business Units and Enablers, conduct in depth investigations where required and provide recommendations on actions and remedy, as appropriate.</li> <li>(e) Support, supervise and enable BUs and BEs in their application of the Policy throughout CIMBT. In this coordinating role, the department actively liaises with other departments within the Bank on human rights issues and facilitates human rights reporting internally and externally.</li> <li>(f) Conduct periodic review of the CIMBT's Human Rights Policy to assess the need for any additions or changes.</li> </ul>

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<b>Role</b>	<b>Responsibility</b>
CIMB Thai Management Committee	<ul style="list-style-type: none"> <li>a) Monitor the human rights risk profile of the CIMBT's business activities and to ensure the implementation of appropriate frameworks, policies, methodologies, procedures and/ or controls so as to mitigate human rights risks.</li> <li>b) Endorse prior to the approval of the Board, appropriate human rights-related policies and procedures for CIMBT, and to review and approve dispensation request.</li> <li>c) Review top / material human rights risks for CIMBT and track management responses/ actions in order to ensure active management of such risks.</li> <li>d) Provide advice and recommendations to the Board with respect to Human Rights at CIMBT.</li> <li>e) Act as an advocate for human rights, both within the organisation and externally.</li> </ul>
CIMB Thai Board of Directors  (refer to the Board Charter for full Roles and Responsibilities)	<ul style="list-style-type: none"> <li>(a) Review and approve appropriate human rights policies for CIMBT, in line with CIMBT's Sustainability strategy and commitments.</li> <li>(b) Ensure and oversee the institutionalisation of respect for human rights as part of CIMBT's culture.</li> </ul>
CIMB Thai Board Risk and Compliance Committee	(a) Provide oversight and advice to the Board and Management in respect of Sustainability Risk, including human rights risk.
CIMB Thai Audit Committee	(a) Support the Board in ensuring there is a reliable and transparent reporting and internal control system for Sustainability, including human rights.
Business Units and Business Enablers	(a) Business Units are responsible for integrating human rights due diligence considerations into business and risk management policies and processes and report on progress. Although implementation of the human rights due diligence are the responsibilities of all employees, frontline units are the primary owners of risk. Frontline units are responsible for

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<b>Role</b>	<b>Responsibility</b>
	<p>performing the appropriate due diligence on new and potential business relations to ensure that the business relations and proposed transactions are consistent with the principles of CIMBT.</p> <p>(b) All employees of CIMBT must escalate appropriately where they encounter human rights violations or abuses.</p>

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Section 2	:	Policy	
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**2.5. SPECIFIC GOVERNING REGULATIONS**

All applicable local regulations must be taken into consideration in conjunction with this Policy. The Group will abide by all prevailing and current and future regulations and the relevant regulators in our respective jurisdictions.

This Policy must comply and be read in conjunction with the applicable regulations as in the list below:

#	Governing Regulations
1	<p>Act of Parliaments:</p> <ul style="list-style-type: none"> <li>(a) The Labour Protection Act B.E. 2541</li> <li>(b) Labour Relations Act, B.E. 2518</li> <li>(c) National Human Rights Commission Act, B.E. 2542 (1999)</li> </ul> <p>All applicable local regulations and rectified Conventions must be taken into consideration in conjunction with this Policy. CIMBT will abide with all prevailing and future regulations and the relevant regulatory guidance in our respective jurisdictions.</p>
2	<p>Key External Reference Documents</p> <ul style="list-style-type: none"> <li>(a) UNEP-FI Principles for Responsible Banking</li> <li>(b) The International Bill of Human Rights, including the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights</li> <li>(c) UN Guiding Principles on Business and Human Rights</li> <li>(d) International Labour Organisation Declaration on Fundamental Principles and Rights at Work</li> </ul>

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Section 2	:	Policy	
Sub-Section 2.6	:	Key Internal Reference Documents	
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**2.6. KEY INTERNAL REFERENCE DOCUMENTS**

The Policy must be read in conjunction with the following policies and is operationalised by various Business Units and Business Enablers across the Group, and guided by the following:

- 1) Entity Governance Policy;
- 2) CIMB Risk Library;
- 3) Sustainability Policy, which includes the following:
  - a) Sustainable procurement principles
  - b) Sustainable facilities management principles
  - c) Exclusion List of activities which we will not knowingly associate with;
- 4) Sustainable Financing Policy, which includes Sector Guides and requirements for high risk sectors;
- 5) Green, Social, Sustainable Impact Products and Services Framework, which seeks to promote positive Sustainability impacts in our products and services;
- 6) Human Resources Policies and Procedures, which deals with sexual harassment and provides a grievance mechanism for employees;
- 7) Employee Diversity and Inclusion Policy, which includes promotion of equal treatment and opportunities for employees, as well as prevention of harassment and discrimination;
- 8) Personal Data Protection Policy, which covers personal data processing and customers' rights as data subjects;
- 9) Treating Customers Fairly Policy;
- 10) Complaints Handling Policy;
- 11) Code of Ethics and Conduct for employees, which covers corruption and bribery;
- 12) Procurement Policy, which contains the Vendor Code of Conduct;
- 13) Whistleblowing Policy;

<b>CIMB Thai Human Rights Policy</b>			
Section 3	:	Policy Owner & Document History & Control	
Sub-Section	:	-	
Approval Date	:	xxx	Effective Date : xxx
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### **3. POLICY OWNER & DOCUMENT HISTORY & CONTROL**

#### **3.1. POLICY OWNER**

Sustainability Lead, CIMB Thai (CIMBT).

#### **3.2. DOCUMENT HISTORY & CONTROL**

<b>Version</b>	<b>Description of Change</b>	<b>Prepared by</b>	<b>Authorised by</b>	<b>Approval Date</b>
1.0	New Policy developed.	Sustainability TH	<ul style="list-style-type: none"> <li>i. Risk Management Committee;</li> <li>ii. CIMBT Board of Director;</li> </ul>	

#### **3.3. NEXT REVIEW DATE**

This Policy is to be reviewed and updated at least once in every two (2) years or as and when there are changes made to the Policy to reflect current practices arising from changes in applicable laws, regulations, guidelines or changes as requested by CIMBT Board or CIMB Group GSGC.

#### **3.4. TRANSLATED VERSIONS IN OTHER LANGUAGES**

Thai Language

#### **3.5. KEYWORDS FOR QUICK SEARCH**

Not Available.