# Human Rights Due Diligence (HRDD)

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**Introduction**

JMT Network Services Public Company Limited operates a debt management business and provides services relating to customers' financial information. These activities are sensitive and may involve the human rights of several stakeholder groups. The Company therefore places great importance on respecting the human rights of employees, customers, business partners and society. It has extended its practices from the Human Rights Policy to Human Rights Due Diligence (HRDD) to identify, assess and manage human rights risks systematically.

These practices align with the UN Guiding Principles on Business and Human Rights (UNGPs), focusing on human rights issues that cover the Company's key business partners and related industries, including incidents that have occurred in the past and those that may occur in the future.

The Company uses value chain analysis to identify and assess activities that may cause adverse human rights impacts, prioritize issues and establish appropriate preventive or remediation measures.

The Company's Human Rights Due Diligence process comprises six main steps:

1. Establishing the Human Rights Policy
2. Identifying and assessing human rights impacts
3. Establishing measures to prevent and reduce negative impacts
4. Monitoring and reviewing implementation
5. Communication with stakeholders and the public
6. Mitigation and remediation of impacts

This Human Rights Due Diligence checklist serves as an important tool for managing human rights within the organization. It covers the identification of issues that may directly or indirectly affect stakeholders, including key business partners, enabling the Company to balance economic growth with respect for the human rights of all parties.

**Definitions**

Value Chain

Means all of the Company's operational processes that create value for products or services.

**Debtor**

Means a bank or financial institution that assigns the Company the right to manage debt collection.

**Customer**

Means an individual or legal entity whose debt the Company is assigned to manage by the originating bank or financial institution. These persons are a key stakeholder group that may be affected by the Company's debt collection process.

**Scope of the Human Rights Due Diligence Process**




1. Establishing the Human Rights Policy
2. Identifying Issues and Assessing Potential Impacts of the Company's Activities
3. Measures to Prevent and Reduce Potential Negative Impacts
4. Monitoring Implementation and Reviewing Issues
5. Communication with Stakeholders and the Public
6. Mitigation and Remediation

## 1. Establishing the Human Rights Policy

The Company has established a Human Rights Policy to ensure that it treats all stakeholder groups responsibly and does not violate human rights in any matter. The policy covers the following topics:

- Forced Labor
- Child Labor
- Treatment of Female Employees
- Non-Discrimination
- Prevention of Sexual Harassment
- Safety, Occupational Health and the Workplace Environment
- Employee Representatives
- Human Rights of Stakeholders

The full policy is available through the links or QR codes below.

Thai Version https://www.jmtnetwork.co.th/storage/document/cg/human-rights-policy-th.pdf

English Version https://www.jmtnetwork.co.th/storage/document/cg/human-rights-policy-en.pdf

## 2. Identifying Issues and Assessing Potential Impacts of the Company's Activities

- **Value Chain**

**Bidding for Non-Performing Loans and Non-Performing Assets (NPL/NPA)**

- Participate in bids to purchase non-performing loans and non-performing assets transparently and fairly.

**Management of Non-Performing Loans and Non-Performing Assets**

- Help customers restructure their debts so that they can recover financially and return to the economy.

**Support and Operational Processes**

- Improve operational efficiency by adopting technology to reduce costs and provide faster services.

**Debt Collection and Sales of Non-Performing Assets**

- Develop debt collection systems and asset sales channels to improve accessibility and efficiency.

**After-Sales Service**

- Follow up on service delivery to improve quality and build customer trust.

- **Identifying Human Rights Issues across the Value Chain**

| Broad Risk Topic | Actual or Potential Risk Event or Situation |
|---|---|
| Protection of Privacy and Prevention of Privacy Violations | 1. Use of debtors' personal data without permission |
| | 2. Obtaining debtor information from other persons without consent |
| | 3. Employees accessing debtor information in the system without access rights |
| Fair Treatment of Customers | 1. Use of harsh language, threats or insults toward debtors |
| | 2. Debt collection that exceeds the scope of the Company's rules, affecting debtors' families or surrounding communities |
| | 3. Debt collection systems displaying information that does not reflect debtors' current status, potentially causing debtors who have already paid to lose rights or opportunities |
| | 4. Failure to inform debtors of their rights or provide complete details of debt repayment |
| Labor Rights | 1. Working overtime beyond prescribed limits to meet the Company's targets |
| | 2. Stress or pressure from debtors or supervisors |
| | 3. A work environment that creates intense competition between teams |
| | 4. Being subjected to harsh language, threats, insults or harassment by debtors while performing duties |
| | 5. A promotion process that creates high levels of pressure |
| | 6. No formal mental health support system for employees who experience pressure from debtors |
| Safety and Occupational Health | 1. Insufficient toilets for employees, causing inconvenience and potentially affecting their basic hygiene |

## Assessing the Significance of Human Rights Issues

Likelihood: 1 = Very low; 2 = Low; 3 = Moderate; 4 = High; 5 = Very high

Severity: 1 = Very low; 2 = Low; 3 = Moderate; 4 = High; 5 = Very high

**Likelihood**

1 = Very Low

2 = Low

3 = Moderate

4 = High

5 = Very High

**Severity**

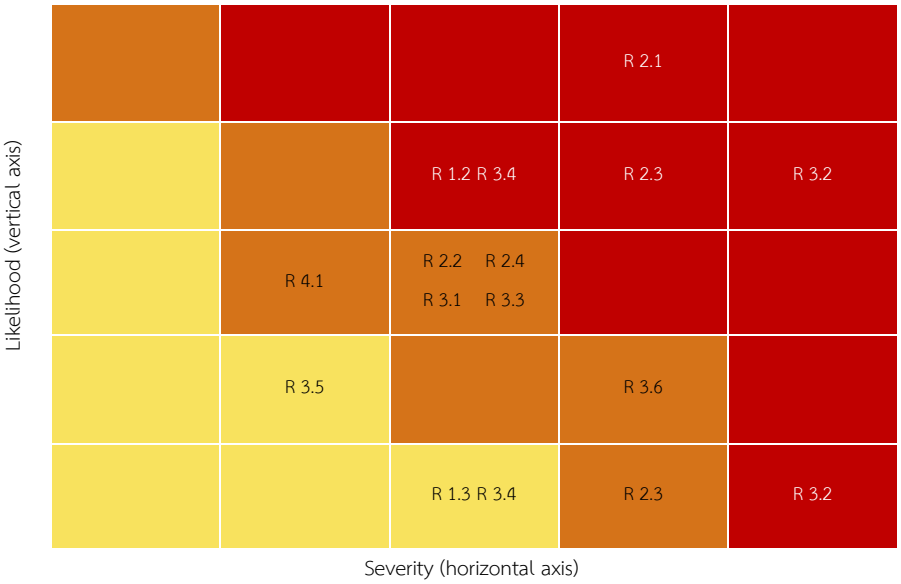
1 = Very Low

2 = Low

3 = Moderate

4 = High

5 = Very High




| | | |
|---|---|---|
| Protection of Privacy and Prevention of Privacy Violations | **R 1.1** | Use of debtors' personal data without permission |
| | **R 1.2** | Obtaining debtor information from other persons without consent |
| | **R 1.3** | Employees accessing debtor information in the system without access rights |
| Fair Treatment of Customers | **R 2.1** | Use of harsh language, threats or insults toward debtors |
| | **R 2.2** | Debt collection that exceeds the scope of the Company's rules, affecting debtors' families or surrounding communities |
| | **R 2.3** | Debt collection systems displaying information that does not reflect debtors' current status, potentially causing debtors who have already paid to lose rights or opportunities |
| | **R 2.4** | Failure to inform debtors of their rights or provide complete details of debt repayment |
| Labor Rights | **R 3.1** | Working overtime beyond prescribed limits to meet the Company's targets |
| | **R 3.2** | Stress or pressure from debtors or supervisors |
| | **R 3.3** | A work environment that creates intense competition between teams |

| | | |
|---|---|---|
| | **R 3.4** | Being subjected to harsh language, threats, insults or harassment by debtors while performing duties |
| | **R 3.5** | A promotion process that creates high levels of pressure |
| | **R 3.6** | No formal mental health support system for employees who experience pressure from debtors |
| Safety and Occupational Health | **R 4.1** | Insufficient toilets for employees, causing inconvenience and potentially affecting their basic hygiene |

Explanation: The human rights risk matrix has no green area because harm caused to people is difficult to reverse.

- **Criteria for Assessing Human Rights Issues**

| Level | Definition of Likelihood | Definition of Severity | Extent of Severity |
|---|---|---|---|
| Very Low | No incidents within one year | No affected persons | No monetary loss |
| Low | One incident within one year | No more than 2 affected persons | Monetary loss of no more than THB 100,000 |
| Moderate | No more than 2 incidents within one year | No more than 4 affected persons | Monetary loss ranging from THB 100,001 to THB 300,000 |
| High | No more than 3 incidents within one year | No more than 6 affected persons | Monetary loss ranging from THB 300,001 to THB 400,000 |
| Very High | More than 3 incidents within one year | More than 6 affected persons | Monetary loss exceeding THB 400,000 |

### 3. Measures to Prevent and Reduce Potential Negative Impacts

| Actual or Potential Risk Event or Situation | Measures to Prevent and Reduce Potential Negative Impacts |
|---|---|
| 1. Use of debtors' personal data without permission | • Establish a Personal Data Protection Policy, communicate it regularly to employees at all levels and make it available through channels that employees can easily access.<br>• Provide PDPA awareness training for employees, particularly departments directly involved in collecting and using personal data. |
| 2. Obtaining debtor information from other persons without consent | • Establish clear guidelines on the use of personal data, communicate them and oversee strict compliance by the relevant departments.<br>• Provide periodic PDPA awareness training and reviews of the relevant requirements, particularly for departments directly involved in collecting and using personal data, to prevent unintentional personal data breaches. |
| 3. Employees accessing debtor information in the system without access rights | • Limit data access rights according to employees' duties and responsibilities, and review data access periodically.<br>• Review and improve information systems to include identity verification and data encryption measures (Access Control & Data Encryption) to prevent unauthorized access.<br>• Provide periodic PDPA awareness training and reviews of the relevant requirements, particularly for departments directly involved in collecting and using personal data, to prevent unintentional personal data breaches. |
| 4. Use of harsh language, threats or insults toward debtors | • Provide annual training on the code of conduct for debt collection and relevant regulations to reinforce polite conduct and respect for human dignity.<br>• Communicate disciplinary measures for employees who commit misconduct. |

| Actual or Potential Risk Event or Situation | Measures to Prevent and Reduce Potential Negative Impacts |
|---|---|
| 5. Debt collection that exceeds the scope of the Company's rules, affecting debtors' families or surrounding communities | • Review and update the Debt Collection Operations Manual in line with laws and the Code of Conduct.<br>• Communicate disciplinary measures for persons who violate the relevant rules or code of conduct. |
| 6. Debt collection systems displaying information that does not reflect debtors' current status, potentially causing debtors who have already paid to lose rights or opportunities | • Improve the debtor database to ensure that it is accurate, complete and regularly updated.<br>• Verify information before disclosing it or using it for debt collection. |
| 7. Failure to inform debtors of their rights or provide complete details of debt repayment | • Provide regular training on the code of conduct for debt collection to reinforce its importance.<br>• Provide transparent channels through which debtors can make inquiries or request further information. |
| 8. Working overtime beyond prescribed limits to meet the Company's targets | • Adjust workforce plans to match the workload and ensure that employees do not work beyond the hours prescribed by law. |
| 9. Stress or pressure from debtors or supervisors | • Establish systematic guidelines for employee well-being and provide channels to contact the Human Resources Department when employees experience pressure from their work.<br>• Organize activities regularly to boost morale and promote a positive work environment. |
| 10. A work environment that creates intense competition between teams | • Promote a cooperative corporate culture by communicating the principle of "working as a team and respecting one another."<br>• Organize internal activities to build relationships between teams and departments. |

| Actual or Potential Risk Event or Situation | Measures to Prevent and Reduce Potential Negative Impacts |
|---|---|
| 11. Being subjected to harsh language, threats, insults or harassment by debtors while performing duties | • Establish a system for receiving complaints or incident reports from employees facing risky situations, ensuring their privacy and safety.<br>• The Human Resources Department or direct supervisors should be ready to provide assistance or advice to employees who encounter problems. |
| 12. A promotion process that creates high levels of pressure | • Establish transparent assessment and promotion criteria and ensure equal access for employees at all levels.<br>• Communicate the criteria to employees regularly to build understanding and reduce concerns. |
| 13. No formal mental health support system for employees who experience pressure from debtors | • Establish a practical plan to support employees that can effectively address the problems they face and adequately meet their needs.<br>• Organize relaxation activities to reduce stress during working hours. |
| 14. Insufficient toilets for employees, causing inconvenience and potentially affecting their basic hygene | • Provide hygiene arrangements that adequately meet the needs of both male and female employees. |

## 4. Monitoring Implementation and Reviewing Issues

4.1. Departments involved in complaint handling monitor incidents reported through all channels and compile information for action under the HRDD process for mitigating and remediating human rights impacts.

4.2. Require management to review the Human Rights Policy at least once a year.

4.3. Management is required to prepare a self-assessment form for key business partners at least once a year.

4.4. Require management to conduct Human Rights Due Diligence (HRDD) once a year.

## 5. Communication with Stakeholders and the Public

5.1. The Company discloses statistics on human rights complaints in its Annual Registration Statement / Annual Report (Form 56-1 One Report) and Sustainability Report (SD Report). These reports are available on the Company's website for easy access by stakeholders.

5.2. The Company publishes the following policies on its website to assure stakeholders of its commitment to responsible Human Rights Due Diligence (HRDD):

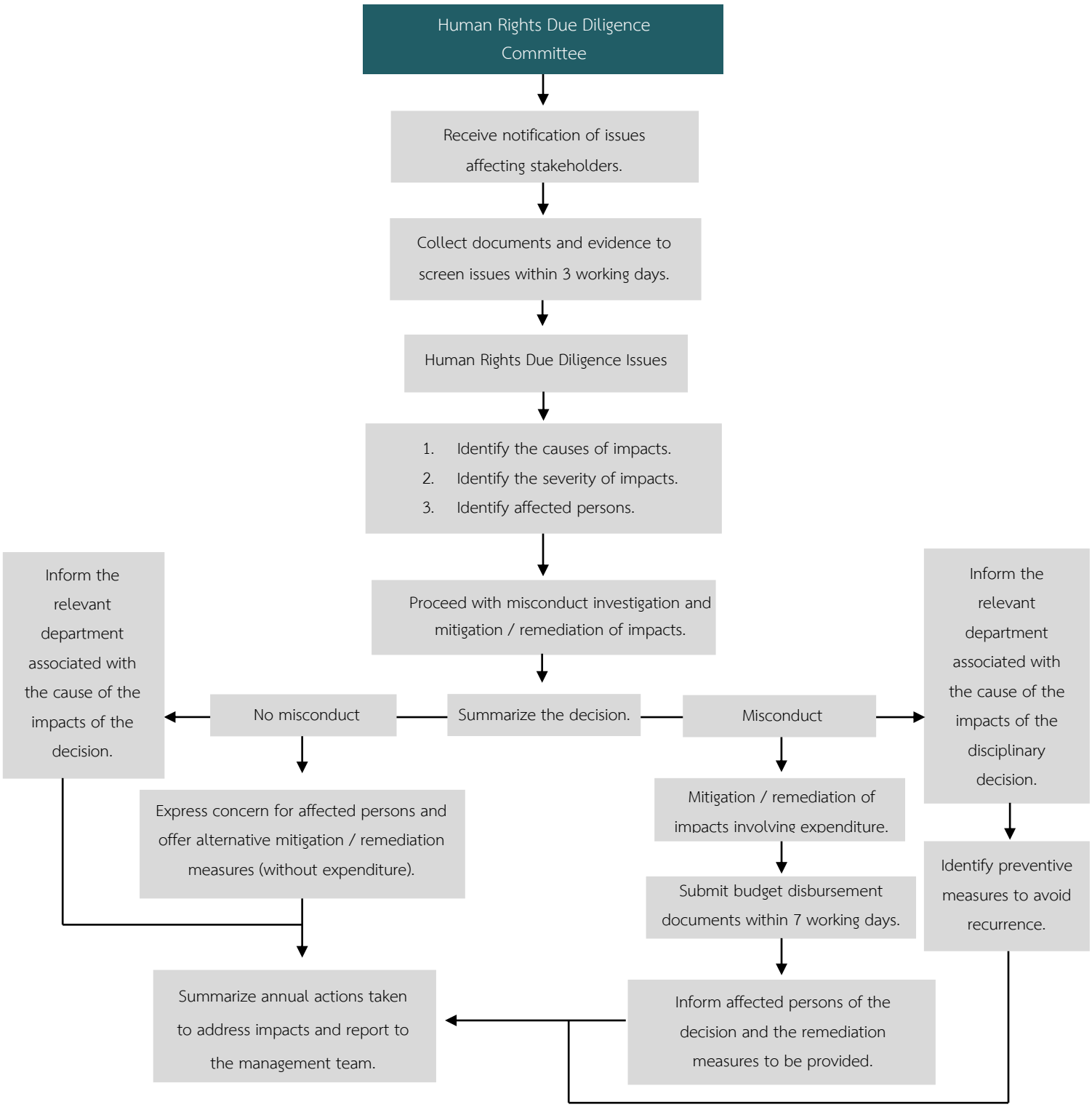
5.2.1. Human Rights Policy

5.2.2. Code of Conduct

5.2.3. Supplier Code of Conduct

5.2.4. Human Rights Due Diligence (HRDD)

## 6. Preventive Measures and Remediation



**Schedule for Reviewing Due Diligence Issues**

The department responsible for this Human Rights Due Diligence (HRDD) document must review the details of each issue to ensure that they remain current and relevant every two years, or whenever an urgent review is necessary, and submit them to the Board of Directors for consideration and approval.

Effective from 11 November 2025 onwards.



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Human Rights Due Diligence (HRDD)

Mr. Adisak Sukumvitaya

Chief Executive Officer

## Revision History

| Revision | Responsible Department | Review Date | Effective Date | Details of Revision |
|---|---|---|---|---|
| REV00 | Investor Relations | | 17 May 2024 | Initial preparation |
| REV01 | Investor Relations | At Board of Directors Meeting No. 4/2024 on 8 November 2024 | 11 November 2024 | Revised the method for identifying human rights issues and the issues identified. |
| REV02 | Investor Relations | At Board of Directors Meeting No. 7/2025 on 11 November 2025 | 11 November 2025 | 1. (Revised) Method for identifying human rights issues based on the Company's value chain.<br>2. (Revised) Assessment of the significance of human rights issues (Human Rights Risk Matrix).<br>3. (Revised) Criteria for assessing human rights issues.<br>4. (Revised) Measures to prevent and reduce potential adverse impacts in line with the issues identified. |
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