



Human Rights Due Diligence Guidelines

Bangkok Dusit Medical Services Public Company Limited

Contents

Definition	1
1. Human Rights Management Framework	4
2. Objectives	5
3. Scope	6
3.1 Scope of Application	6
3.2 Core Processes	6
3.3 Group , Areas , Relevant Unit	6
3.4 Human Rights Due Diligence and Risk Assessment Process	7
4. Human Rights Governance Structure	7
5. Duties and Responsibilities	8
5.1 Duties and Responsibilities of the Sustainable Development Committee	8
5.2 Duties and Responsibilities of Central Human Resources Management	8
5.3 Duties and Responsibilities of the Corporate Sustainability Team	9
5.4 Duties and Responsibilities of Business Units	10
6. Guidelines	10
6.1 Human Rights Risks and Impact Assessment	11
6.1.1 Timeline for Conducting Risk and Impact Assessment	11
6.1.2 Human Rights Risk and Impact Assessment Process	12
6.2 Impact Mitigation and Management	18
6.3 Monitoring of Implementation Performance	20
6.4 Communication of Implementation Outcomes	21
6.5 Remediation of Impacts	22
7. Workflow	23
7.1 Workflow for the Organizational-Level Human Rights Assessment(Own Operation)	22
7.2 Workflow for the Organizational-Level Human Rights Assessment in the Supply Chain	24
8. Communication and Training Channels	24
9. Monitoring and Measurement of Processes/Services	25
10. Related Quality Documents	26
11. References	26

Appendix	28
Appendix 1	29
Appendix 2	30
Appendix 3	39
Appendix 4	52

Definition

No.	Term	Definition
1	Human rights	The inherent and fundamental rights and freedoms to which all individuals are equally entitled by virtue of being human, without discrimination on the grounds of race, nationality, religion, gender, color, language, belief, or any other status.
2	Rights-Holders	An individual or group of individuals possessing legally recognized rights and entitled to the equal protection and respect of those rights on a basis of full equality with all other Individual or group of individuals.
3	Human rights due diligence	A continuous process through which the Company identifies, assesses, prevents, mitigates, and accounts for how it addresses actual and potential human rights risks and impacts arising from its business operations, including monitoring of implementation and transparent disclosure of results.
4	Human rights due diligence in own operations	Human Rights Due Diligence refers to the assessment and consideration of human rights risks and impacts within the full scope of the Company's operational activities, excluding the operations of suppliers and business partners.
5	Human rights due diligence in supply chain	Human Rights Due Diligence within supplier and contractor groups from which the Company procures goods and services as part of its business operations, including both core and supporting activities throughout the business value chain.
6	Haman Rights Risks	Risks arising from the Company's operational activities may lead to violations of the rights of rights holders and may subsequently result in adverse human rights impacts in the future.
7	Salient Human Rights Issues	The most significant human rights risks and impacts are associated with the Company's operations, which may affect rights holders. These issues are required the highest level of attention, preventive action, and ongoing management to mitigate those risks.
8	Inherent risk	The level of risk that is naturally present or implicit within a particular activity, determined by its inherent conditions, before

		the application of any preventive or mitigating measures or controls.
9	Residual risk	The level of risk that remains after the implementation of risk mitigation measures and control mechanisms intended to reduce the identified risk.
10	Human Rights Impacts	An impact arising from the human rights violation that affects stakeholders or rights holders—whether already occurred or is currently taking place.
11	Remedability	The extent to which a person who has suffered a human rights violation can be effectively restored to their previous condition.
12	Remedy and Remediation	A structured process through which appropriate remedies are provided to individuals affected by human rights violations, which may include both financial and non-financial measures, such as apologies, restitution, rehabilitation, compensation, etc.
13	Business Relationships	Any direct or indirect relationship that the Company maintains with business partners, suppliers, contractors, or other entities that is linked to its business operations, products, or services. This includes relationships with non-Tier 1 suppliers within the supply chain and relationships through joint ventures, irrespective of whether the Company holds a controlling or non-controlling equity interest.
14	Corporate Central Unit (Bangkok Hospital Headquarters)	For the purposes of this document, “ Central Unit ” refers to: (1) in relation to BDMS Own Operations processes, the Central Human Resources Management at the Corporate Level; and (2) in relation to Supply Chain processes, the Central Procurement Department at the Corporate Level.
15	Business units	For the purposes of this document, “ Business Unit ” refers to: (1) in relation to BDMS Own Operations processes, the Human Resources Department of each business unit; and (2) in relation to Supply Chain processes, the Procurement Department of each business unit. The Business Units subject to the implementation of this document shall be divided into the following 7 categories (refer to Section 3.3 (1.b)):

		<ol style="list-style-type: none">1. BDMS Network Hospital (Business Groups 1, 3, 4, and 6)2. Samitivej Chain (Business Group 2, excluding BNH Hospital)3. BNH Hospital4. Phyathai Hospital and Paolo Hospital Chain (Business Group 5)5. Business Group 7.1 (Non-Hospital)6. Business Group 7.2 (Non-Hospital)7. Other Medical Support Business Groups
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1. Human Rights Management Framework

The BDMS Human Rights Policy sets forth the framework for human rights management in line with the expectations of applicable international standards. This framework is structured as a set of continuous operational processes, as outlined below:

- 1.1 **Policy Announcement and Enforcement.** The Company shall establish and review its Human Rights Policy every 3 years, or earlier in cases where the Company identifies changes in human rights, risks or impacts. The Company also promote and embed this Policy throughout the organization to foster a culture of respect for human rights and communicate the Policy to external stakeholders in an appropriate and effective manner.
- 1.2 **Risk Identification and Risk Assessment.** The Company performs effective identification and assessment of human rights risks and impacts arising from its business operations and throughout its supply chain.
- 1.3 **Risk Management Planning and Mitigation Measures.** The Company develops risk management plans and establishes appropriate mitigation measures, as well as enhancing existing controls, for human rights risk issues classified as high and very high (i.e., risks that must be prioritized for management). Such measures should be reviewed and implemented on an annual basis.
- 1.4 **Monitoring and Reporting.** The Company shall conduct ongoing monitoring and reporting of the implementation of mitigation measures, corrective action plans, and performance results relating to human rights risks classified as high and very high priority (risks that require immediate and prioritized management), to evaluate effectiveness and ensure continuous improvement in risk management practices.
- 1.5 **Communication and Disclosure of Risk Management.** The Company shall communicate its approaches to managing human rights impacts and risks to affected parties and all stakeholder groups and shall publicly disclose the results of its human rights performance and risk management in a transparent and accountable manner.
- 1.6 **Remediation of Human Rights Impacts.** The Company shall ensure the provision of appropriate remedies to persons affected by human rights violations and shall establish and maintain an effective grievance and whistleblowing mechanism for all stakeholder groups to report concerns and submit complaints relating to human rights issues.

The Company conducts its operations in accordance with the United Nations “Protect, Respect and Remedy” Framework under the United Nations Guiding Principles on Business and Human Rights (UNGPs), which provides guidance for conducting business in a manner that respects human rights and ensures the establishment of appropriate remediation mechanisms in cases where adverse impacts occur, thereby enhancing confidence and trust among all stakeholder groups.

Human Rights Due Diligence (HRDD) is implemented to enable the identification of potential human rights risks arising from the activities of business units, including those within the supply chain, and to serve as a basis for the prevention, mitigation, and remediation of adverse impacts resulting from human rights violations.

This guideline is established to communicate with relevant practitioners and enable the complete and effective implementation of processes in alignment with the expectations of the Company's Human Rights Policy, in accordance with the Company's Human Rights Due Diligence (HRDD) framework, covering both the scope of the Company's Own Operations and its Supply Chain. This document defines the analytical framework, roles and responsibilities of relevant units, operational processes, workflow structures, and reporting lines for the Human Rights Due Diligence process and specifies the implementation cycle for human rights risk identification and assessment to be conducted every three (3) years for the Company and its business units, with progress monitoring carried out on an annual basis. The Central Human Resources Management (Corporate Level) may review and revise this document as necessary to ensure clearer communication and more effective implementation of operational processes, and information derived from the execution of this guideline shall be used as an input for the continuous review and enhancement of the Company's Human Rights Policy.

2. Objectives

1. To establish the Human Rights Due Diligence (HRDD) process of BDMS and its business units.
2. To define the roles, responsibilities, and report requirements for the assessment of human rights risks by business units.
3. To establish the process for monitoring and reporting progress in the implementation of measures aimed at preventing and mitigating human rights risks.

3. Scope

3.1 Scope of Application

This document shall be applicable to all business units within BDMS and defines the roles and responsibilities related to the Human Rights Due Diligence process, including the development and implementation of remediation plans in cases of human rights violations, as outlined in the section entitled "Roles and Responsibilities." The implementation of this document shall be consistent with and shall not contravene any applicable domestic and/or international laws and regulations. The operational scope covered under this document includes the following:

1. Own Operations (BDMS Operational Level) This scope covers the operations of the Company and all subsidiaries, regardless of the location of each business unit, including business units that are joint venture partners or that maintain business relationships with BDMS, particularly in cases where BDMS has the authority to control or significantly influence the operations of such joint ventures.
2. Supply Chain Scope This scope encompasses the assessment of human rights risks across the entirety of the BDMS supply chain. Nevertheless, the identification and assessment of such risks shall primarily focus on Tier-1 suppliers and contractors.

3.2 Core Processes

The Human Rights Due Diligence (HRDD) process consists of the following essential processes to be implemented:

1. The Human Rights Due Diligence (HRDD) process within BDMS Own Operations comprises the identification and assessment of risks, the implementation of risk management measures, the monitoring of compliance, and the reporting of human rights risks arising from the Company's business activities. The Human Rights Due Diligence (HRDD) process within the Supply Chain focuses on the assessment of human rights risks within the supply chain.
2. The establishment and implementation of risk management measures, the monitoring of compliance, and the reporting of human rights risks arising from the business activities of BDMS's suppliers and contractors engaged in the provision of goods and services to BDMS.

3.3 Groups, Areas, and Relevant Unit

The key parties responsible for implementing the processes outlined in this document are as follows:

1. Human Rights Due Diligence Process in BDMS Operational Procedures (Own Operations)

- a. The Central Human Resources Management (Corporate Level)

- b. The Human Resources Departments (BU Level) The key parties responsible for implementing the processes outlined in this document are categorized by business unit as follows:

1. BDMS Network Hospital (Business Groups 1, 3, 4, and 6)
2. Samitivej Chain (Business Group 2, excluding BNH Hospital)
3. BNH Hospital
4. Phyathai Hospital and Paolo Hospital Chain (Business Group 5)
5. Business Group 7.1 (Non-Hospital)

6. Business Group 7.2 (Non-Hospital)
 7. Other Medical Support Business Groups
2. Human Rights Due Diligence Process in BDMS supply chain
 - a. Central Procurement Department (Corporate Level)
 - b. Procurement Department (BU Level) by dividing the business units of the operator according to section

3.4 Human Rights Due Diligence and Risk Assessment Process

The Human Rights Risk Assessment (HRRRA) process covers all business units within the organization and all stakeholder groups that may be affected, including: 1) Customers and Patients 2) Employees 3) Physicians and Dentists 4) Supplier 5) Banks and Creditors 6) Investors and Shareholders 7) Communities and Society and also considers vulnerable groups, including women, children, persons with disabilities, the elderly, minorities, migrant workers, indigenous peoples, and LGBTQ+ individuals.

4. Human Rights Governance Structure

BDMS recognizes human rights as a fundamental element of its sustainability management framework. To ensure effective governance, the company has established the Sustainability Development Committee. This Committee plays a pivotal role in supporting and advising management to ensure that all sustainability initiatives, including those related to human rights, are aligned with the organization's long-term strategy and comply with internationally recognized standards and best practices.

To drive human rights initiatives, the Central Human Resources Management and the Corporate Sustainability Team collaborate with various departments across the organization. They act as the central coordinating body for implementing policies, strategies, programs, and operational plans in different areas, ensuring that practices within the management system meet established expectations.

To ensure the highest standards of practice across all areas, the company systematically applies the Three Lines of Defense Model, as follows:

- **First Line of Defense:** Risk-owning departments manage human rights risks in accordance with their professional standards to meet the company's expectations.
- **Second Line of Defense:** The Central Human Resources Management and the Corporate Sustainability Team, in collaboration with the Risk Management Department, monitor, assess, and

report performance to ensure alignment with the Human Rights Policy. These reports are submitted regularly to the Sustainable Development Committee.

- **Third Line of Defense:** Under the whistleblowing mechanism, any accepted human rights-related complaints are reported to the Corporate Governance and Sustainability Committee (depending on the nature of the violation) and ultimately to the Board of Directors.

5. Duties and Responsibilities

5.1 Duties and Responsibilities of the Sustainable Development Committee

1. Provide support and guidance on sustainability management, including human rights initiatives, to ensure that the organization's sustainability practices align with the company's strategy and comply with international standards.
2. Promote collaboration among business units and ensure effective communication of sustainability and human rights approaches and projects.
3. Monitor progress of projects aimed at advancing sustainable development across social, environmental, and governance, and report regularly to the Corporate Governance Committee.
4. Assign oversight responsibilities to relevant committees or members, designate accountable personnel for day-to-day operations, and allocate sufficient resources to ensure comprehensive and effective human rights due diligence.
5. Review and propose organizational measures or practices to mitigate and prevent high and very high risks, and present these to the Board of Directors and Executive Committee.
6. Review BDMS Human Rights Policy every 3 (three) years, or sooner if significant changes in human rights risks and impacts are identified.

5.2 Duties and Responsibilities of Central Human Resources Management

1. Assign to relevant committees or responsible members to oversee the process, designate persons in charge of day-to-day operations and allocate sufficient resources to ensure an effective and comprehensive human rights due-diligence process.
2. Analyze human rights risks related to all business units and provide the results to each unit as a starting point for their own risk assessments.
3. Collect grievance reports categorized by business units to support human rights risk evaluation.
4. Conduct an overall human rights risk assessment for the company by consolidating and evaluating human rights risks identified by each business unit.

5. Consult internal and external experts (including 3rd party advisers) and engage continuously with stakeholders to assess and identify risk-management approaches.
6. Develop organizational-level measures or guidelines to mitigate and prevent high and very high human rights risks.
7. Monitor the implementation of mitigation and prevention measures across the company.
8. Publicly disclose the human rights due-diligence process, human rights risks, and organizational-level mitigation and prevention approaches.
9. Review BDMS's Human Rights Policy every three years, or sooner if significant changes in human rights risks or impacts are identified.
10. Plan and implement annual awareness-building programs for BDMS employees and management on human rights processes, key business-related human rights risks, and BDMS-specific risks.
11. Plan and implement awareness-building programs on BDMS's human rights processes and key risks for units responsible for contractor and supplier management, as well as for suppliers and contractors—particularly 1st tier suppliers/contractors.

5.3 Duties and Responsibilities of the Corporate Sustainability Team

1. Analyze human rights risks relevant to all business units and provide these as baseline considerations for their risk assessments.
2. Receive and review complaints reports categorized by business units to support human rights risk evaluation.
3. Assess overall human rights risks for the company by consolidating risk assessment results from individual business units.
4. Engage internal and external experts (3rd party) and facilitate ongoing stakeholder consultations to evaluate and identify risk management approaches.
5. Develop and propose organizational measures or practices to mitigate and prevent high and very high risks and submit these to the Sustainable Development Committee.
6. Monitor implementation of mitigation and prevention measures for company-wide risks.
7. Disclose information publicly on human rights due diligence, identified risks, and organizational mitigation and prevention strategies.
8. Plan and implement awareness programs for employees and BDMS management on processes, key human rights risk issues, and BDMS-specific risks on an annual basis.

9. Plan and implement awareness programs for units managing suppliers and contractors, focusing on Tier-1 suppliers and contractors, regarding BDMS human rights processes and key risk issues.

5.4 Duties and Responsibilities of Business Units

1. Conduct human rights risk assessments within the designated timeframe, ensuring consultation with relevant departments within the business unit.
2. Prepare and submit reports on risk assessment results, existing control measures, and action plans for risk mitigation and prevention to the Central Human Resources Management, following the reporting provided in Appendix 1.
3. Prepare annual progress reports on the implementation of mitigation and prevention plans and submit them to Central Human Resources Management.
4. Collect data on human rights-related issues and complaints received at the business unit level and annually report to Central Human Resources Management.
5. Collaborate in planning and coordination with Central Human Resources Management to organize human rights awareness programs, ensuring comprehensive coverage of target groups within the unit as defined by Central Human Resources Management.

6 Guidelines

The comprehensive human rights due diligence process includes the following steps: 26



Figure 1 Human Rights Due Diligence Processes

6.1 Human Rights Risk and Impact Assessment

Human rights risk and impact assessment is the process of identifying issues where the organization is currently causing, or is at risk of causing, human rights violations to stakeholders and rights-holders. This process is critical for determining the areas where the organization must establish mitigation measures and continuously monitor the effectiveness of its actions.

The assessment of human rights risks and impacts is based on analyzing risks that affect stakeholders and rights-holders, without considering risks to the organization itself. Accordingly, BDMS defines two key analytical processes within its risk assessment framework:

Table 1: Risk Analysis Framework in the Comprehensive Human Rights Due Diligence Process

Human Rights Due Diligence (Risk Assessment Stage)		Risk Analysis Framework
1	Human Rights Due Diligence Process in Own Operations	Risks and potential human rights impacts may affect stakeholders or rights-holders who could be impacted by activities conducted within <u>BDMS operational areas, business activities carried out by BDMS or its business units, or actions by BDMS employees</u> . This scope does not include operations of suppliers or business partners.
2	Human Rights Due Diligence Process in supply chain	Risks and potential human rights impacts may affect stakeholders or rights-holders who could be impacted by the operations and business activities of BDMS suppliers and contractors, both within and outside BDMS premises*.

**Note: Risk analysis focuses on suppliers and contractors that have a direct business relationship with BDMS (tier-1 suppliers and contractors).*

6.1.1 Timeline for Conducting Risk and Impact Assessment

BDMS requires all business units to conduct a human rights risk assessment every 3 (three) years. The Central Human Resources Management is responsible for determining the assessment cycle for each business unit. In

addition, the Central Human Resources Management may request a business unit to initiate a risk assessment process or review relevant risks outside the scheduled cycle under the following circumstances:

1. Occurrence of a significant incident that may constitute a human rights violation.
2. Initiation of a new investment or project that could potentially impact local communities or stakeholders.
3. Sudden changes in industry risk profiles due to emergencies, amendments to laws affecting certain rights, or public health situations (e.g., implementation of personal data protection regulations, outbreaks of infectious diseases).

6.1.2 Human Rights Risk and Impact Assessment Process

6.1.2.1 Identification and Screening of Human Rights Risks¹

The identification and screening of BDMS human rights risks are based on various sources of information, including:

1. Industry and Operational Area Risks: Review human rights risk issues relevant to the nature of the business and operational areas. This includes referencing credible sources such as news articles, human rights reports from reputable organizations, and compilations of business-related human rights issues prepared by recognized institutions (Appendix 3).
2. BDMS-Specific Risks
 - I. Review human rights risks classified as very high and high based on previous assessment cycles.
 - II. Compile issues currently under investigation and complaints in the process of remediation.
 - III. Collect complaint data received from all stakeholder groups for consideration as potential risks or impacts, even if these issues have not entered the investigation process or lack clear mitigation measures.

¹ In addition to risk assessment, evaluators should consider the type of complicity the company may have in relation to each identified risk. The categories of complicity are as follows:

1. **Direct Complicity:** Occurs when the company is directly involved in supporting or facilitating human rights violations, with knowledge or reasonable awareness that such actions constitute a violation.
2. **Beneficial Complicity:** Occurs when the company benefits from human rights violations committed by others, even if the company is not directly involved or aware of the violation.
3. **Silent Complicity:** Occurs when the company remains passive and fails to take action to oppose or prevent human rights violations within its sphere of influence

- IV. Assess risks or impacts that have occurred or may occur from activities within BDMS’s value chain and identify stakeholder groups that could be affected by these risks.
- 3. Risks Related to Suppliers in the Supply Chain
 - i. Collect human rights risk information from suppliers through a risk assessment questionnaire. This form should include BDMS-identified human rights risks and inquire about relevant risks associated with the supplier, considering processes within the value chain.
 - ii. BDMS departments involved with suppliers, such as the Procurement Department, should assess risks or impacts that have occurred or may occur from activities within BDMS’s value chain.

6.1.2.2 Human Rights Risk Assessment

BDMS’s human rights risk assessment consists of the following activities:

- 1. Conduct a workshop to discuss and evaluate risks based on the assessment criteria outlined in this document. The following departments should participate in the workshop to assess human rights risks:

Table 2: Departments Involved in Human Rights Risk Assessment

Human Rights Due Diligence (Risk Assessment Stage)		Risk Analysis Framework
1	Human Rights Due Diligence Process in Own Operations	1. Human Resources Management 2. Marketing and Public Relations (stakeholder engagement: community groups) 3. General Support Department (Oversees environmental management) 4. Compliance & Legal 5. Complaints Unit (under Human Resources Management) 6. Customer Relations (stakeholder engagement: patients and customers) 7. Corporate Sustainability 8. Enterprise Risk Management 9. Quality Management 10. SHE (Safety, Health, and Environment)

Human Rights Due Diligence (Risk Assessment Stage)		Risk Analysis Framework
		11. Information Technology (Data Privacy)
2	Human Rights Due Diligence Process in supply chain	1. Procurement Department 2. Partner Relations 3. Complaints Unit 4. Compliance & Legal 5. Corporate Sustainability

2. During the workshop, the level of risk will be assessed based on the risk evaluation criteria outlined in this document. The assessment will focus on stakeholders who have been, or may potentially be, impacted by human rights issues that have undergone preliminary screening (refer to the data collection form in Appendix 1).
 - I. Discuss potential risks for each issue by collecting data on actual incidents that caused impacts or events indicating high risk.
 - II. Specify which human rights are linked to the identified risk.
 - III. List the groups likely to be impacted by the event, including vulnerable groups that may face heightened risks.
 - IV. Evaluate the risk level before implementing any mitigation measures, using the scoring criteria outlined in section 6.1.2.4.
 - V. Specify management actions or measures to reduce or control the identified risks.
 - VI. Re-evaluate the risk level after applying mitigation measures, using the same scoring criteria in 6.1.2.4.
3. When assessing risks, it is essential to consider the participation of various stakeholder groups. The engagement can be facilitated through surveys, focus group discussions, or individual interviews. The information gathered will serve as supporting data for evaluating human rights risks.
4. Risk assessment must consider stakeholders and vulnerable groups who may be affected by the identified risks. These include: BDMS employees and staff, Women, Children, LGBTQ+ individuals, Persons with disabilities, Indigenous peoples, Migrant workers, Employees of business partners and contractors working with BDMS, and Communities surrounding BDMS facilities.
5. Conduct the risk assessment by assigning scores according to the human rights risk evaluation criteria specified in this document.

6.1.2.3 Human Rights Risk Assessment Criteria

1. **Impact Assessment Criteria (X-Axis)** The evaluation is based on three key factors:
 - I. Severity of Impact (Scale) Consider the level of seriousness of the impact. For example: Loss of life (classified as very high risk), permanent disability, psychological harm.
 - II. Scope of Impact (scope): The extent of the impact, considering how broadly the issue affects stakeholders or operations.
 - III. Remediability: Evaluate the ability and timeframe to remedy or restore the affected individuals or situation to their original state before the impact occurred.

Table 3: Impact Assessment Criteria for Human Rights Risk Issues

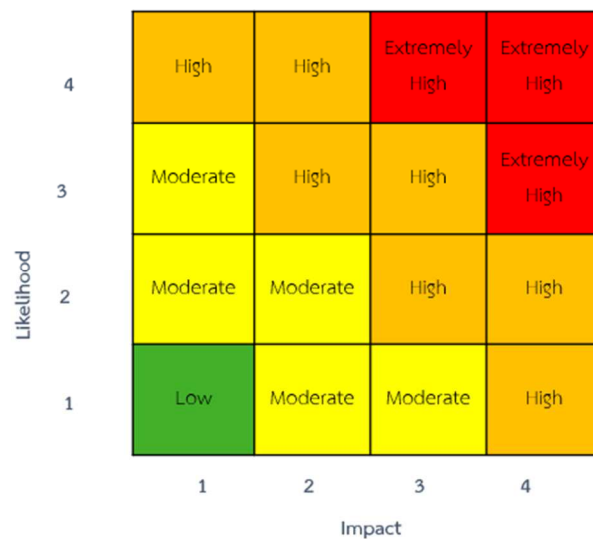
Level	Scale	Scope	Remediability
4 (Extremely High)	Severe human rights violations occurred, <u>resulting in loss of life, permanent disability, or severe and permanent impacts on health (both physical and mental).</u>	Significant <u>social impact</u> with widespread consequences affecting a large number of people.	Irreversible damage occurred, which <u>cannot be restored to its original state.</u>
3 (High)	Severe human rights violations affecting physical and mental well-being, resulting in <u>occupational disability or significant disruption to normal living conditions.</u>	Affects an <u>entire stakeholder</u> group or up to 1,000 affected persons.	Remediable and restorable to original condition, with a recovery duration of <u>more than 5 years.</u>
2 (Moderate)	<u>Human rights violations</u> causing minor health impacts or <u>first-aid level injuries (physical and mental).</u>	Affects a <u>majority of stakeholder</u> group or up to 100 affected persons.	Remediable and restorable to original condition, with a recovery duration of <u>1-5 years.</u>
1 (Low)	<u>Categorized as a human rights violation</u> with no physical or mental health consequences.	Affects a <u>minority of stakeholder</u> group or up to 10 affected persons.	Remediable with a <u>short-term recovery period (under 1 year)</u>

2. **Likelihood Assessment Criteria (Y-Axis)** is as followed:

Table 4 Likelihood Assessment Criteria for Human Rights Risks

Level	Likelihood/Opportunity
4 (Extremely High)	Likely to occur annually / Has occurred within the past year.
3 (High)	High probability / Has occurred once within the past 1 to 3 years.
2 (Moderate)	Moderate probability / Has occurred once within the past 5 years.
1 (Low)	Low probability / Has occurred once in more than 5 years.

3. **Risk Prioritization Criteria** Human rights risk prioritization is determined based on impact and likelihood criteria. Risks are categorized into four levels: Extremely High, High, Medium, and Low. Risk management protocols are then tailored accordingly to correspond with each specific risk level.



Group	Risk Level	Risk Management Approach
1	Low	Record the risks and mitigation measures to monitor and review during the next assessment cycle.
2	Moderate	Establish additional mitigation measures for risks with high-impact potential and/or increase the stringency of existing mitigation controls
3	High	Identify specific mitigation measures along with an action plan, clear timelines, and designated responsible persons.

4	Extremely High	<ul style="list-style-type: none"> - At the Business Unit Level: Identify specific mitigation measures along with an action plan, clear timelines, and designated responsible persons. - At the Corporate/Central Level: Define policy-level action plans and communicate them to relevant business units; establish operational frameworks and designate responsible persons.
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Figure 2 Human Rights Risk Prioritization Criteria and Risk Management Approach for each level

6.1.2.4 Human Rights Risk Analysis

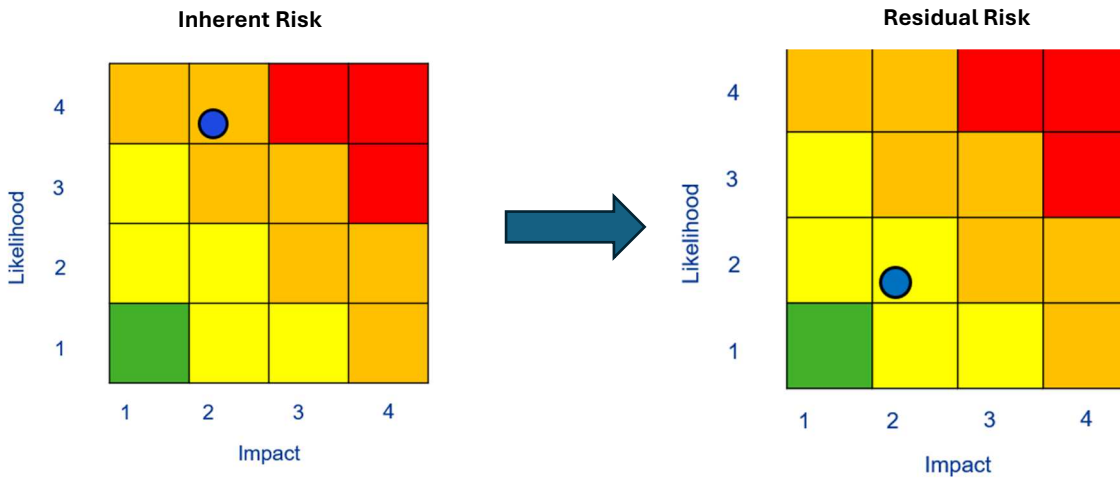
Risks can be classified into the following two categories:

1. **Inherent Risk:** The level of risk that exists naturally or is intrinsic to a specific situation based on its context, **before** any measures or controls are implemented to mitigate the risk.
2. **Residual Risk:** The level of risk remains **after** existing measures and controls have been applied.

The risk analysis process is as follows:

1. When conducting a risk assessment, the assessor must evaluate the risk level **before** any control measures are in place to determine the **Inherent Risk** in an unmanaged state.
2. Following that, existing measures are considered to evaluate the **Residual Risk** remaining **after** the implementation of various controls.
3. Residual risks identified at "High" and "Very High" levels are classified as **Salient Risks**, which require further management and mitigation actions.

Example of Inherent and Residual Risks



6.1.2.5 Human Rights Risk Review

The Central Human Resources Management shall conduct an annual review of human rights risks based on the risk assessment results submitted by individual business units. This data is consolidated at the Central Human Resources Management to assess the overall risk level of the organization. The review must also consider factors that could lead to sudden changes in risk levels. (For factors triggering an off-cycle risk review by the Central Human Resources Management, please refer to Section 6.1.1).

6.2 Impact Mitigation and Management

1. In the event that damages occurred, the following actions shall be taken:

1.1 Assign a Case Officer: A responsible person shall be appointed on a case-by-case basis to monitor and acknowledge impacts from the affected parties. This officer is responsible for maintaining communication with the affected parties until the problem is resolved and/or remediation process is finalized.

1.2 Report to Corporate HR: Submit the matter to the Central Human Resources Management (Central) for acknowledgment and to determine the appropriate actions for problem resolution and remediation. This should be considered on a case-by-case basis as deemed appropriate.

Risk Management is determined according to each level as follows:

Risk Level	Management Approach	Relevant PIC
Extremely High Risk	<ul style="list-style-type: none"> Establish guidelines and action plans to mitigate risk by creating specific action items. 	Business Units associated with the risk

	<ul style="list-style-type: none"> Define a timeframe for monitoring performance and progress. Assign the person(s) responsible for implementation. 	
	<ul style="list-style-type: none"> Establish action plans at the policy level, create action items, and communicate them to the relevant Business Units or responsible departments. Define a timeframe for monitoring performance and progress. Assign the person(s) responsible for implementation. 	Central Human Resources Management
High Risk	<ul style="list-style-type: none"> Establish risk mitigation measures and/or upgrade existing mitigation measures already in place. 	Risk Owners (Relevant Departments)
Moderate to Low Risk	<ul style="list-style-type: none"> Collect data on risk resolution and mitigation approaches. Monitor these risk issues and incorporate them into the next risk assessment cycle. 	Risk Owners (Relevant Departments)

Examples of Mitigation Measures

Example – Risk of Verbal and Online Harassment

Identified Risk	Relevant Stakeholders	Recommended Measures	Implementation Timeline	Responsible Unit

Risk of verbal and online harassment	<ul style="list-style-type: none"> Employees 	<ul style="list-style-type: none"> Develop a Harassment Prevention Policy Establish a BDMS Code of Conduct regarding harassment Provide additional training on harassment prevention 	1 st Quarter	Unit concerning ethical compliance
		<ul style="list-style-type: none"> Establish an internal hotline for reporting harassment incidents 	2 nd Quarter	

6.3 Monitoring of Implementation Performance

The Company should continuously monitor and assess the effectiveness of its human rights risk mitigation measures. This may include evaluating reductions in human rights violation cases, decreases in the number of complaints, improvements in the working environment, and enhanced understanding of human rights among employees and business partners. The Company should review these processes regularly—such as every three years or more frequently—to ensure that the measures remain effective and aligned with the evolving business and social context.

Responsibilities for monitoring implementation within each relevant unit are as follows:

1. Business Unit Level: Business units are responsible for monitoring the performance of all issues categorized as very high risks and selected high risks for which mitigation measures have been established. They must report progress annually to Central Human Resources Management.
2. Central Human Resources Management and Relevant Units: The Central Human Resources Management, together with other relevant units, shall monitor the performance of human rights impact/risk mitigation measures every 12 months at both the business unit and organizational levels. This includes tracking progress against the action plans established for each identified risk.

Table 5 Summary of Risk Management, Monitoring, and Disclosure Requirements by Risk Level

Group	Risk Level	Management Approach	Disclosure*
1	Low	Maintain information on current risk mitigation approaches	No disclosure required
2	Medium	Maintain information on current risk mitigation approaches for consideration in the next assessment cycle	No disclosure required
3	High	<ul style="list-style-type: none"> - May select key issues for which additional risk mitigation measures should be developed - Annual monitoring 	Disclosure may be considered for issues that the Company prioritizes in its management approach
4	Extremely High	<ul style="list-style-type: none"> - Mandatory implementation of risk mitigation measures - Annual monitoring 	Disclose as salient human rights risks

**Note: Disclosure of information is the responsibility of the Central Human Resources Management Division, which may choose to disclose such information in the Annual Report, the Sustainability Report, or on the Company's website.*

6.4 Communication of Implementation Outcomes

The Central Human Resources Management is responsible for communicating the implementation outcomes as follows:

1. The Central Human Resources Management is responsible for consolidating and analyzing organizational-level risks to establish appropriate measures to mitigate potential impacts and reduce emerging risks. This includes the public disclosure of extremely high and high risks to ensure transparency and social accountability. All information is reviewed and updated annually. Human rights risk assessment results will be summarized and disclosed to the public through the Company's Sustainability Report and website. The disclosure will specify the assessment scope, units assessed, key findings, improvement actions for risk management measures, and adherence to international transparency standards.
2. The Central Human Resources Management is responsible for publicly disclosing risk information, mitigation performance, and human rights management approaches. The following information may be disclosed:

- i. Human Rights Policy and commitments
 - ii. The Company's human rights due diligence process
 - iii. The Company's salient human rights risks, including very high and high risks, or medium risks deemed significant and requiring mitigation plans
 - iv. Mitigation and remediation measures for each disclosed risk
3. Disclosure of progress on implementation, including a brief description of the mechanisms applied and the outcomes achieved from executing the impact/risk mitigation plan.

6.5 Remediation of Impacts

In the event of a human rights violation and/or any human rights-related impact, BDMS will consider undertaking appropriate remediation measures in accordance with applicable laws, related policies, and the nature of the impact. Remediation may take the form of monetary compensation—such as damage compensation—or non-monetary remedies, including formal apologies or other appropriate actions. The remediation process includes the following steps:

- i. When a human rights violation occurs, conduct consultations with relevant stakeholders to identify appropriate remedies or corrective measures for affected individuals.
- ii. Implement corrective or remedial actions promptly, as appropriate to the nature and severity of the impact, such as issuing a formal apology or providing compensation in monetary or non-monetary form.
- iii. Report the remediation outcomes to the affected individuals, allowing them the opportunity to provide comments or suggestions.
- iv. Follow up and maintain regular communication with the affected individuals until their situation has been restored to the condition prior to the occurrence of the impact of human rights.

BDMS allocates a dedicated budget to support its mitigation and remediation plans for affected individuals, including the development of mechanisms to address human rights violations, as well as preparing funding for any compensation that may be required.

7 Workflow

7.1 Workflow for the Organizational-Level Human Rights Risk Assessment (Own Operation)

Flow of due diligence process (own operations)

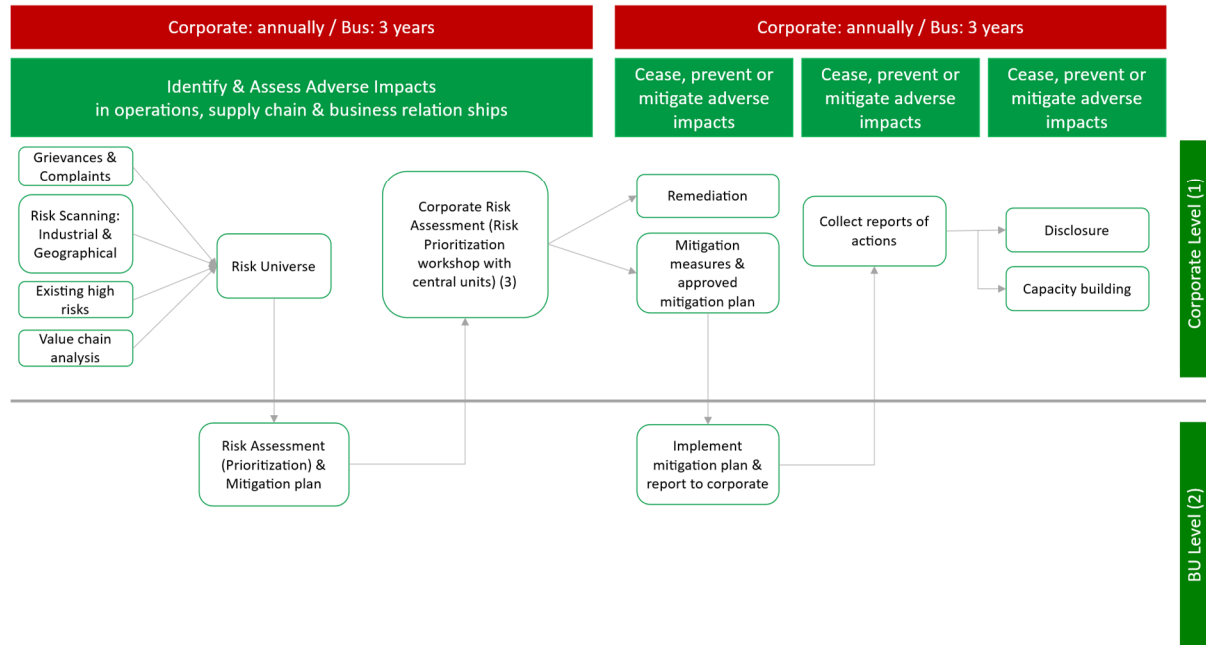


Figure 3 Workflow of the Human Rights Due Diligence Process for Own Operations

Note: (1) Corporate Level refers to the Central Human Resources Management Division; (2) BU Level refers to the primary responsible units (Human Resources Management units) of the seven business groups described in Section 3.3 (stakeholder groups, geographical areas, and relevant units); (3) Relevant units involved in the workshop for prioritizing human rights risks at the Own Operations level are listed in Section 6.1.2.2 (Table 2).

7.2 Workflow for the Human Rights Risk Assessment in the Supply Chain

Flow of due diligence process (supply chain)

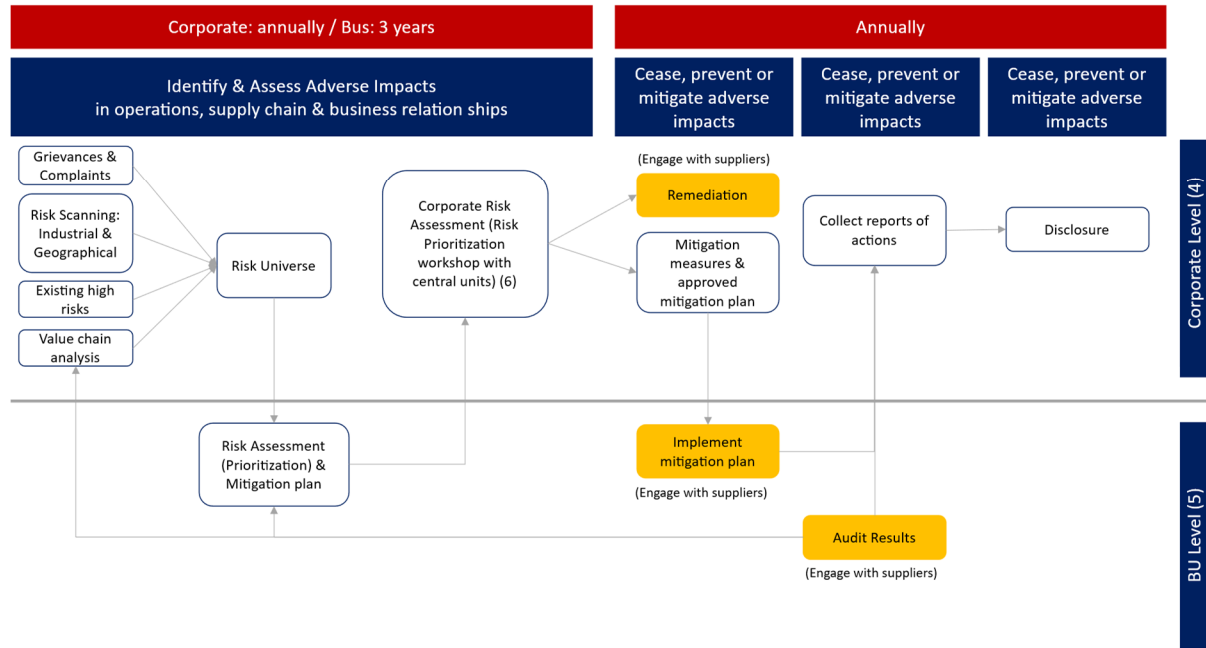


Figure 4 Workflow of the Human Rights Due Diligence Process in the Supply Chain

Note: (4) Corporate Level refers to the Central Human Resources Management Division; (5) BU Level refers to the primary responsible units (Procurement Departments) of the seven business groups described in Section 3.3 (stakeholder groups, geographical areas, and relevant units); (6) Relevant units involved in the workshop for prioritizing human rights risks at the Supply Chain level correspond to those listed in Section 6.1.2.2 (Table 2).

8 Communication and Training Channels

The Central Human Resources Management is responsible for communicating and providing training on the human rights due diligence process, in conjunction with training on the BDMS Human Rights Policy, as follows:

1. The Central Human Resources Management Division is responsible for communication and training for BDMS employees and executives. This includes consulting on processes and coordinating with Human Resources units at the business unit level.

2. The Central Procurement Department is responsible for communication and awareness-building for BDMS business partners and contractors. This includes consulting on processes and coordinating with procurement units at the business unit level.

3. Internal communication is carried out through risk reporting and updates to relevant stakeholders for high and extremely high risks. External communication is conducted through public disclosure of human rights risk information via channels such as the Company’s website or the Sustainability Report.

9 Monitoring and Measurement of Processes/Services

Monitoring and measurement of processes/services are conducted within the following data collection framework to support ongoing performance tracking:

1. Business units shall prepare a human rights risk assessment report, in accordance with the reporting format provided in Appendix A.
2. Business units shall report the outcomes of their human rights risk prevention and mitigation efforts annually, in accordance with the reporting format provided in Appendix A.
3. The Central Human Resources Management Division (Corporate Level) and the Central Procurement Department (Corporate Level) are responsible for consolidating all collected information. The consolidated data will be used to develop additional risk mitigation measures for the following year and to incorporate identified risks into the next risk assessment cycle.
4. Consultations shall be conducted with stakeholders or parties related to affected individuals to gather feedback, which will be considered for improving and refining risk mitigation measures for the subsequent year.

Table 6 Information Required for the Human Rights Due Diligence Process, Responsible Units, and Timeline

	Information Collected	Data Owner	Reported To	Timeframe
1	Human Rights Risk Assessment Report	Business Units	Central Human Resources Management (Corporate Level) and Central Procurement Department (Corporate Level)	Once every three years, or upon the occurrence of a risk review at the business unit level
2	Annual performance report on prevention and mitigation of risks in the extremely high- and high-risk categories	Business Units	Central Human Resources Management (Corporate Level) and Central	Annually

	Information Collected	Data Owner	Reported To	Timeframe
			Procurement Department (Corporate Level)	
3	Remediation report for affected individuals	Assigned remediation unit and case-specific designated personnel	Central Human Resources Management (Corporate Level) and Central Procurement Department (Corporate Level)	Upon the occurrence of a case undergoing remediation consideration
4	Complaints received through grievance channels	Grievance-handling units (Both Corporate Level and Business Unit Level)	Central Human Resources Management (Corporate Level) and Central Procurement Department (Corporate Level)	Annually
5	Feedback from affected individuals regarding the remediation process	Assigned remediation unit and case-specific designated personnel	Central Human Resources Management (Corporate Level) and Central Procurement Department (Corporate Level)	Upon the occurrence of a case undergoing remediation consideration

10 Related Quality Documents

1. BDMS Human Rights Policy
2. BDMS Diversity, Equity, and Inclusion Management Policy
3. BDMS Employee Code of Conduct
4. BDMS Supplier Code of Conduct
5. F/M-04-BDMS-006 Human Rights Risk Assessment Data Collection Form

11 References

1. Background and principle
 - United Nations Guiding Principles on Business and Human Rights

2. Procedure

- OECD Due Diligence Guidance for Responsible Business Conduct.
- The International Bill of Human Rights and IFC Sustainability Framework

Appendix

Appendix 1: Risk Register Form

Appendix 2: Human Rights Issues in BDMS Business Activities and Across the Value Chain

Appendix 3: Potential Human Rights Issues Relevant to Business

Appendix 4: Sources of Human Rights Risk Information Relevant to Business

Appendix 1: Risk Register Form

Risk Issue	Description	Affected Stakeholder Groups	Inherent Risk Level <i>(Extremely High / High / Medium / Low)</i>	Current Mitigation Measures	Residual Risk Level <i>(Extremely High / High / Medium / Low)</i>	Additional Measures <i>(Applicable when the residual risk remains Extremely High or High)</i>

Appendix 2: Human Rights Issues in BDMS Business Activities and Across the Value Chain

2.1 Examples of Potential Human Rights Risk Issues Relevant to BDMS’s Business, Including Risks Identified in Local Contexts and Across the Industry

No.	Risk Issue	Description	Potential Risk Points	Potentially Affected Stakeholders
1	Discrimination	<ul style="list-style-type: none"> - Discrimination against LGBTQI+ personnel through strict dress-code regulations. - Discrimination based on gender identity and sexual orientation due to specific requirements within certain work contexts. - Discrimination against job applicants on the basis of physical characteristics or health-related reasons. - Discrimination and bias from supervisors. - Lack of care and respect toward diverse medical personnel (e.g., women and LGBTQI individuals). 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Employees - Medical Personnel - Supplier
2	Harassment	<ul style="list-style-type: none"> - Verbal harassment toward colleagues, whether of the opposite sex or the same sex. - Verbal violence and verbal harassment (across different professions) that show a lack of respect for differences between professional roles. - Physical harassment (e.g., inappropriate touching) between doctors, medical personnel, and patients. - Violence among coworkers, particularly within groups of cleaning staff employed by partner companies. 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Employees - Medical Personnel - Supplier

No.	Risk Issue	Description	Potential Risk Points	Potentially Affected Stakeholders
		<ul style="list-style-type: none"> - “Cases of sexual harassment arising from colleagues who behave in an overly familiar or inappropriate manner. - Cyberbullying, such as recording images or audio of medical staff (especially women) during service or care without consent and distributing such recordings online. 		
3	Working and living conditions	<ul style="list-style-type: none"> - Leave days for childcare (or maternity leave) that do not comply with legal requirements. - No designated space for breastfeeding for mothers. - Lack of employee benefits related to childcare, such as access to daycare services. - Long and inflexible working hours due to insufficient medical staffing. - Unequal access to employee benefits and entitlements, such as differing health-insurance programs across hospitals within the same network. - A work environment that causes stress due to heavy workloads and inadequate numbers of medical personnel. - Risks arising from unsafe working environments (particularly in cases where operations are conducted by external partners outside the company’s premises). 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Employees - Medical Personnel - Supplier
4	Healthcare Inequality	<ul style="list-style-type: none"> - Uninsured patients receive delayed medical care. 	<ul style="list-style-type: none"> - Own operation 	<ul style="list-style-type: none"> - Patient/Customer

No.	Risk Issue	Description	Potential Risk Points	Potentially Affected Stakeholders
		<ul style="list-style-type: none"> - Economic barriers to accessing medication, particularly for low-income individuals—for example, high drug prices, which lead pharmaceutical companies to face scrutiny regarding pricing practices and medicine accessibility. - Systemic barriers to accessing medication, especially for rural populations, migrant workers, and vulnerable groups. These systemic issues include weak drug-distribution systems, inefficient public-health systems, and complex drug-registration procedures. 		<ul style="list-style-type: none"> - Community
5	Personal Data Protection	<ul style="list-style-type: none"> - Risks of personal-data privacy violations within the company’s operational areas. - The expansion of digital health systems, including biometrics data, has increased security and privacy risks in the sharing of patient information. These risks include potential misuse of data and the possibility of government intervention or surveillance. 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Employees - Medical Personnel - Supplier - Patient/Customer
6	Patient and customer safety	<ul style="list-style-type: none"> - Safety risks arising from fatigue and long working hours (e.g., medication-dispensing errors and other mistakes that may affect patient safety). - Accidents caused by healthcare-facility design and human error by personnel. 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Patient/Customer

No.	Risk Issue	Description	Potential Risk Points	Potentially Affected Stakeholders
		<ul style="list-style-type: none"> - Cleanliness issues related to hospital laundry, which may affect patient health or cause discomfort. - Cleanliness issues in hospital facilities, which may affect patient health or cause discomfort. - Cleanliness and delivery-timing issues related to food services, which may affect patient health or cause discomfort. - Protection of the health and rights of volunteers in medical research, including ensuring clear informed consent, monitoring participant well-being, stakeholder engagement, and effective communication of health risks. This also includes protecting vulnerable groups, ensuring access to post-trial treatment, and transparent disclosure of research results. 		
7	Environmental Impacts and Pollutions	<ul style="list-style-type: none"> - Risks of physical and property damage (e.g., impacts associated with helicopter operations). - Noise pollution caused by traffic management around the hospital. - Complaints related to traffic congestion. - Pollution generated from operational activities (e.g., emissions from generators, air pollution from frequently operating ambulances, etc.). 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Community

No.	Risk Issue	Description	Potential Risk Points	Potentially Affected Stakeholders
		<ul style="list-style-type: none"> - Noise and flashing emergency signals from ambulances that affect surrounding communities. - Smoke emissions from boilers affecting nearby households. - Pollution from pharmaceutical manufacturing operations near factory sites, which impacts ecosystems, harms living organisms, and creates health risks that cannot yet be clearly assessed. 		
8	Occupational Health and Safety	<ul style="list-style-type: none"> - Occupational health and safety risks faced by contractor workers (especially those working within the company’s operational areas), including: <ul style="list-style-type: none"> ○ drug use, ○ personal protective equipment (PPE), ○ use of machinery that poses risks of exposure to severe infectious diseases. - Increased health and safety risks, especially for vulnerable and migrant workers, following the COVID-19 pandemic, particularly in countries with weak regulatory oversight. 	<ul style="list-style-type: none"> - Supply chain 	<ul style="list-style-type: none"> - Supplier
9	Child Labor	<ul style="list-style-type: none"> - Contractor workers who work on company premises or have access to company areas (e.g., transportation and logistics staff) who are younger than the legally required minimum age, leading to risks and concerns regarding 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Employees - Supplier

No.	Risk Issue	Description	Potential Risk Points	Potentially Affected Stakeholders
		the true age of the workers given the working conditions and nature of the tasks performed		
10	Forced Labor	<ul style="list-style-type: none"> - Human trafficking, forced labor or unpaid labor, and debt-bonded labor in the healthcare sector. 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Employees - Supplier
11	Inappropriate Migrant Worker Management	<ul style="list-style-type: none"> - Lack of clear communication regarding the use of migrant labor in the supply chain, especially in service roles within operational areas, which may lead to inadequate labor-protection measures due to cultural and language barriers. - Absence of a clear responsible-sourcing policy, which may result in irresponsible procurement activities going unmonitored or uncontrolled. - Risks of migrant workers being charged excessive recruitment fees by brokers during the hiring process, or brokers/labor agencies exploiting migrant workers. 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Employees - Supplier
13	Forced Eviction without any remedies or sufficient compensation	<ul style="list-style-type: none"> - Violations of the right to adequate housing lead to spatial segregation and increase the risk of other human-rights violations, such as discrimination, exclusion, or social marginalization. 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Community
15	Restriction on Freedom of Expression	<ul style="list-style-type: none"> - Restrictions on the rights of employees, contractors, service users/patients, communities, and other relevant stakeholders to express their opinions about the organization’s business operations. This includes the use 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Employees - Supplier - Community

No.	Risk Issue	Description	Potential Risk Points	Potentially Affected Stakeholders
		of Strategic Litigation Against Public Participation (SLAPP), which refers to lawsuits intended to ‘suppress’ or ‘obstruct’ public criticism or commentary on matters of public interest.		
16	Internet Freedom	- Risks related to surveillance, monitoring, website blocking, and the removal of social-media posts, as well as legal actions taken against individuals.	- Own operation	- Employees - Patient/Customer
17	Product development, testing, and use	- Risks related to the development, testing, and use of products by the company.	- Own operation	- Employees
18	Transportation and storage of materials	- Risks associated with the transportation of hazardous materials.	- Supply chain	- Supplier
19	Standards and Regulations	- Risks arising from national and local standards that may not align with international best practices, particularly regarding product testing or improper product use.	- Own operation - supply chain	- Employees - Patient/Customer

2.2 Examples of Human Rights Risk Issues Identified in Peer Companies within the Same Industry

No.	Risk Issue	Description	Potential Risk Points	Potentially Affected Stakeholders
1	Occupational Health and Safety	<ul style="list-style-type: none"> - Workplace accidents resulting from non-compliance with safety measures - Work-related accidents due to damaged or faulty equipment/tools - Occupational illnesses caused by substandard working conditions 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Employees (including employees in supply chain) - Medical personnel
2	Access to Healthcare Services	<ul style="list-style-type: none"> - Patients may be unable to access healthcare services due to inadequate circumstances/conditions (e.g., financial limitations) 	<ul style="list-style-type: none"> - Own operation - 	<ul style="list-style-type: none"> - Community
3	Personal Data Protection	<ul style="list-style-type: none"> - Leakage of patient/customer/employee data - Unauthorized access to personal data - Leakage of personal data within the supply chain 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Employees - Patient/Customer
4	Illegal Labor Practices	<ul style="list-style-type: none"> - Use of illegal labor in any form, including child labor, forced labor, human trafficking, or modern slavery - Involvement in or linkages to modern slavery or illegal labor practices within the company's value chain 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - employees
5	Discrimination	<ul style="list-style-type: none"> - Discrimination in employment or workplace practices affecting employees and medical personnel - Discriminatory practices occurring in the supply chain - Discrimination toward patients/customers 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Employees (including employees in supply chain) - Patients/Customers

No.	Risk Issue	Description	Potential Risk Points	Potentially Affected Stakeholders
		<ul style="list-style-type: none"> - Discrimination based on age, gender, race, nationality, gender identity and sexual orientation, disability, social status, religion, skin color, political opinion, etc. 		<ul style="list-style-type: none"> - Community - Medical Personnel - Vulnerable Groups
6	Harassment and Intimidation	<ul style="list-style-type: none"> - Inappropriate conduct or harassment (verbal or physical) toward patients/customers - Inappropriate conduct or harassment (verbal or physical) toward employees or medical personnel - Sexual harassment against employees, medical personnel, or patients/customers 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Employees (including employees in supply chain) - Patients/Customers - Medical Personnel - Vulnerable Groups
7	Medical Malpractice	<ul style="list-style-type: none"> - Acts or omissions by medical professionals that fall below acceptable medical standards and result in harm to patients/customers 	<ul style="list-style-type: none"> - Own operation 	<ul style="list-style-type: none"> - Patients/Customers - Vulnerable Groups
8	Product and Service Safety	<ul style="list-style-type: none"> - Facilities or service equipment that are damaged, deteriorated, or unsuitable, posing safety risks to patients/customers - Safety issues involving products used in service 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Patients/Customers
9	Environmental Impacts	<ul style="list-style-type: none"> - Environmental impacts resulting from hospital operations or within the value chain, such as ineffective waste management, operational pollution, etc. 	<ul style="list-style-type: none"> - Own operation - Supply chain 	<ul style="list-style-type: none"> - Community - Vulnerable Groups

Appendix 3: Potential Human Rights Issues Relevant to the Business

3.1 Human Rights Issues Defined in International Human Rights Instruments (UDHR, ICCPR, ICESCR)

No.	List of Rights	Definition	Reference
1	Non-discrimination	All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.	UDHR 2, 7 , ICERD 1 – 7 , CEDAW 2 , CRPD 5 , C100 , C111
2	Right to life	Everyone has the right to life, liberty and security of person.	UDHR 3 , ICCPR 6 – 9
3	Right not to be subjected to slavery, servitude or forced labor	No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.	UDHR 4 , ICCPR 8 , ICRSCR 10 , C29 , C105
4	Right to liberty and security	The rights to protect individual’s liberty from being detained without justification, which stands in contrast to the protection of personal security.	UDHR 3, 9 , ICCPR 9
5	Right not to be subjected to torture, cruel, inhumane and/or degrading treatment or punishment	No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment. In particular, no one shall be subjected without his free consent to medical or scientific experimentation.	UDHR 5 , ICCPR 7 , CAT 2 - 16
6	Right to recognition as a person before the law	All persons deprived of their liberty shall be treated with humanity and with respect for the inherent dignity of the human person.	UDHR 7 , ICCPR 26

No.	List of Rights	Definition	Reference
7	Freedom of thought, religion, and expression	<p>12. Everyone has the right to freedom of thought, conscience, and religion.</p> <p>13. Everyone has the right to freedom of opinion and expression, without interference in seeking, receiving, and imparting information through any media.</p>	<p>UDHR 18 – 19, ICCPR 18 – 19</p>
8	Freedom of association and collective bargaining	<p>Everyone has the right to freedom of association, including the freedom to form, join, or participate in any group, organization, or entity. In addition, workers and employees have the freedom to organize themselves to establish bodies such as labor unions or employee associations, without interference from the government or any other party.</p> <p>Collective bargaining is a process in which workers or employees come together to negotiate working conditions— including wages, working hours, and workplace policies— with employers.</p>	<p>UDHR 20 – 21, ICCPR 21 – 22, ICESCR 8, C87, C98</p>
9	Right to freedom of movement	<p>1. Everyone has the right to freedom of movement and residence within the borders of each state.</p> <p>2. Everyone has the right to leave any country, including his own, and to return to his country.</p>	<p>UDHR 13, ICCPR 12</p>
10	Right to access to effective remedies	<p>Everyone has the right to an effective remedy by competent national tribunals for acts violating the fundamental rights granted to them by the constitution or by law.</p>	<p>UDHR 8, ICCPR 2(3), UNGPs Pillar III</p>
11	Right to a fair trial	<p>1. Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of their rights and obligations and of any criminal charge against them.</p>	<p>UDHR 11, ICCPR 14 – 15</p>

No.	List of Rights	Definition	Reference
		<p>2. Everyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which he has had all the guarantees necessary for his defense.</p> <p>3. No one shall be held guilty of any penal offence on account of any act or omission which did not constitute a penal offence, under national or international law, at the time when it was committed. Nor shall a heavier penalty be imposed than the one that was applicable at the time the penal offence was committed.</p>	
12	Right not to be subjected to imprisonment for inability to fulfill a contract	No one shall be imprisoned merely on the ground of inability to fulfil a contractual obligation.	ICCPR 11
13	Right to Privacy	No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honor and reputation. Everyone has the right to the protection of the law against such interference or attacks.	UDHR 12 , ICCPR 17
14	Right of protection of the child	<p>1. Every child shall have, without any discrimination as to race, color, sex, language, religion, national or social origin, property or birth, the right to such measures of protection as are required by his status as a minor, on the part of his family, society and the State.</p> <p>2. Every child shall be registered immediately after birth and shall have a name.</p> <p>3. Every child has the right to acquire a nationality.</p>	UDHR 25(2) , ICCPR 24 , CRC 1 – 54
15	Right to education	1. Everyone has the right to education. Education shall be free, at least in the elementary and fundamental stages. Elementary education shall be compulsory. Technical and professional education shall be made generally	UDHR 26 , ICESCR 13 – 14 , CRC 28

No.	List of Rights	Definition	Reference
		<p>available and higher education shall be equally accessible to all on the basis of merit.</p> <p>2. Education shall be directed to the full development of the human personality and to the strengthening of respect for human rights and fundamental freedoms. It shall promote understanding, tolerance and friendship among all nations, racial or religious groups, and shall further the activities of the United Nations for the maintenance of peace.</p> <p>3. Parents have a prior right to choose the kind of education that shall be given to their children.</p>	
16	Abolition of child labor	The termination of inappropriate internships or hazardous work performed by children which aims to protect children’s rights and promote education for all children, especially those working in unsafe or age-inappropriate working environment.	UDHR 25 , CRC 32 , C138 , C182
17	Right to health	<p>The right of everyone to the enjoyment of the highest attainable standard of physical and mental health shall be recognized, and includes:</p> <p>1. The provision for the reduction of the stillbirth-rate and of infant mortality and for the healthy development of the child.</p> <p>2. The improvement of all aspects of environmental and industrial hygiene.</p> <p>3. The prevention, treatment and control of epidemic, endemic, occupational and other diseases.</p> <p>4. The creation of conditions which would assure to all medical service and medical attention in the event of sickness.</p>	UDHR 25 , ICESCR 12
18	Right to own property	1. Everyone has the right to own property alone as well as in association with others.	UDHR 17

No.	List of Rights	Definition	Reference
		2. No one shall be arbitrarily deprived of his property.	
19	Right to social security	Everyone, as a member of society, has the right to social security and is entitled to realization, through national effort and international co-operation and in accordance with the organization and resources of each State, of the economic, social and cultural rights indispensable for his dignity and the free development of his personality.	UDHR 22 , ICESCR 9
20	Right to work	<ol style="list-style-type: none"> 1. Everyone has the right to work, to free choice of employment, to just and favorable conditions of work and to protection against unemployment. 2. Everyone, without any discrimination, has the right to equal pay for equal work. 3. Everyone who works has the right to just and favorable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection. 4. Everyone has the right to form and to join trade unions for the protection of his interests. 	UDHR 23 , ICESCR 6
21	Right to enjoy just and favorable conditions of work (including rest and leisure)	<ol style="list-style-type: none"> 1. Everyone has the right to work, to free choice of employment, to just and favorable conditions of work, and to protection against unemployment. 2. Everyone, without discrimination, has the right to equal pay for equal work. 3. Everyone who works has the right to just and favorable remuneration ensuring for themselves and their family an existence worthy of human dignity. 	UDHR 23 – 24 , ICESCR 6 – 7 , C87 , C98
22	Healthy and safety working conditions	A working environment that is safe from incidents, including workplace accidents, and near-miss events, as well as free from occupational diseases.	UDHR 23(1) , 25 , ICESCR 7(b)

No.	List of Rights	Definition	Reference
23	Equal pay for equal work	Individuals working in the same workplace should receive equal compensation for work of equal value, assessed based on objective criteria such as skills, qualifications and job responsibilities.	UDHR 23(2) , ICESCR 7(a)(1) , CEDAW 11(1)(d) , C100 , C111
24	Right to an adequate standard of living (housing, food, water, and sanitation)	<ol style="list-style-type: none"> 1. Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control. 2. Motherhood and childhood are entitled to special care and assistance. All children, whether born in or out of wedlock, shall enjoy the same social protection. 	UDHR 25 , ICESCR 11
25	Women's rights	Women must not be subjected to any form of discrimination, exclusion, or restriction on the basis of sex that has the purpose or effect of impairing or nullifying their recognition, enjoyment, or exercise of rights. This applies regardless of marital status and is based in the equality of men and women in relation to human rights and fundamental freedoms in political, economic, social, cultural, civil or any other fields.	UDHR 2, 16 , CEDAW 1 – 16
26	Rights of persons with disabilities	Discrimination on the basis of disability is prohibited in all aspects of employment, including recruitment criteria, hiring and employment, continued employment, career advancement, and hygienic and safe working conditions.	UDHR 2, 23 , CRPD 27

No.	List of Rights	Definition	Reference
27	Rights of migrant workers	The rights of migrant workers and their family members must be respected and must not be discriminated against in any grounds, such as sex, age, skin color, language, religion or other beliefs, political opinion, race or ethnic origin nationality, economic status, poverty, marital status, place of birth, or any other status.	UDHR 13, 23, ICMW 7 – 67
28	Right of aliens to due process when facing expulsion	An alien lawfully in the territory of a State Party to the present Covenant may be expelled therefrom only in pursuance of a decision reached in accordance with law and shall, except where compelling reasons of national security otherwise require, be allowed to submit the reasons against his expulsion and to have his case reviewed by, and be represented for the purpose before, the competent authority or a person or persons especially designated by the competent authority.	ICCPR 13
29	Protection from racial discrimination	Protection from segregation, exclusion, or discrimination based on race, color, ancestry, national origin, or ethnic origin, whether intentional or resulting in the denial or restriction of the recognition of human rights and fundamental freedom of individuals.	UDHR 2, 7, CERD 1 – 7
30	Rights of minorities	In those States in which ethnic, religious or linguistic minorities exist, persons belonging to such minorities shall not be denied the right, in community with the other members of their group, to enjoy their own culture, to profess and practise their own religion, or to use their own language.	ICCPR 27
31	Environmental rights	The rights to a hygienic and sustainable environment, which forms an essential part of other human rights. Environmental rights include access to clean water, air, and land, as well as a stable climate.	UDHR 25, ICCPR 11 – 12

3.2 Human Rights–Related Risk Issues in the Business Sector

No.	Human Rights–Related Risk Issues in the Business Sector	Description of Risk Issues
1	Displacement of communities	The large-scale movement of people, driven directly or indirectly by changes in the physical environment—whether human-induced or not—which cause shortages of essential resources, such as when climate change reduces regional rainfall and turns arable land into desert, does not stem solely from environmental change but often results from unequal social and political systems that fail to provide adequate protection, food, clean water, and healthcare to affected populations.
2	Water Contamination	Contamination of water sources by substances that render the water unusable for drinking and other activities. Pollutants include chemicals, waste, bacteria, and parasites.
3	Recruitment fees	Any recruitment fees or other charges incurred in the recruitment process for the purpose of securing employment or job placement—regardless of the method, timing, or location of the fee collection—should not be charged to, or otherwise imposed on, workers or job seekers.
4	Passport retention	The confiscation of migrant workers’ passports constitutes a violation of their fundamental labor rights. Withholding their passports effectively means that employers deliberately restrict, detain, or deprive workers of their freedom of movement and their right to seek employment. Importantly, such an act amounts to a form of forced labor.
5	Forced Labor	Forced or compulsory labor refers to work or services that individuals are coerced or compelled to perform against their will. This definition excludes work or services mandated by laws governing military conscription, prison labor conducted under legal supervision, or labor mobilized in emergency situations such as war, natural disasters, or other circumstances that pose a danger. It also excludes community service duties carried out by members of a community for the direct benefit of that community.

No.	Human Rights–Related Risk Issues in the Business Sector	Description of Risk Issues
6	Child Labor	Child labor refers to the employment of children in work that is deemed unacceptable because it is harmful, dangerous, or excessively exploitative. Child labor is categorized into three types: work performed by children who are below the minimum age required for that specific type of work; hazardous work that has adverse effects on the physical, mental, or moral well-being of children; and all forms of the worst forms of child labor.
7	Sexism	Sex-based discrimination refers to the unequal or unfair treatment of individuals based on their sex, often linked to gender stereotypes and socially assigned gender roles. It may also include the belief that one sex is superior to another.
8	Harm	Inflicting injury or harm constitutes a criminal offense in which the perpetrator causes physical or psychological damage to another person.
9	Discrimination	Differential treatment, exclusion, restriction, or unequal preference toward individuals or groups—whether similar or different—includes situations in which identical treatment still results in disadvantage for certain groups. Such practices hinder the principles of human equality.
10	Underpayment	The situation in which employees do not receive the minimum wage for the work they perform. These rights may include overtime rates, penalty rates, payments for annual leave or other types of leave, and allowances, among others.
11	Modern Slavery	Modern slavery refers to contemporary forms of exploitation in which individuals are controlled, coerced, or forced to work—whether they are men, women, or children—and are unable to refuse or leave due to threats, violence, coercion, deception, or abuse of power. Under such conditions, a person’s freedom and fundamental rights are severely diminished or entirely lost.
12	Excessive force	Self-defense against an unlawful act in which the defender’s response is more severe or excessive than the danger being defended against.

No.	Human Rights–Related Risk Issues in the Business Sector	Description of Risk Issues
13	Exploitation	The exploitation or abuse of individuals in the workplace for profit. Such abuse may occur in direct and severe ways or in more subtle and less visible forms, but its impact on victims can be serious which can affect their mental, physical, emotional, and financial well-being.
14	Unsafe working conditions	An unsafe environment surrounding workers during the course of their work, which may lead to accidents.
15	Data privacy infringement	A violation of security measures that leads to the destruction, loss, alteration, disclosure, or unauthorized access to personal data while it is being transmitted, stored, or processed. Therefore, a personal data breach includes any violation affecting the confidentiality, integrity, or availability of personal data.
16	Community engagement	It is both a process and an outcome of working collaboratively to ensure that all people are able to participate in decision-making on matters that affect their lives. Community participation helps strengthen and sustain the working relationship between organizations, community groups, and citizens, enabling all parties to understand and identify the specific needs of each community.
17	Self-determination	The right of individuals to freely determine their own political, economic, social, and cultural status.
18	Freedom of opinion	The right to express or communicate one’s thoughts, feelings, or opinions through speech, gestures, or written communication—whether on paper or in the online environment—as well as through other forms such as music, photographs, graphics, or moving images. This right also includes the freedom to seek, access, and receive information, ideas, and opinions that are communicated and disseminated by others.
19	Privacy	The right of an individual, based on fundamental legal principles, to be left alone without interference or intrusion by others that may cause distress, annoyance, harm, humiliation, or unlawful exploitation.

No.	Human Rights–Related Risk Issues in the Business Sector	Description of Risk Issues
20	Diversity	Diversity within an organization refers to the variety of people, including differences in age, sex at birth, religion, race, nationality, ethnicity, skin color, education, culture, social background, disability, health condition, sexual orientation, marital status, social status, or political opinions.
21	Respect	Respect involves being mindful of how our actions affect others and the collective, as well as accepting people for who they are, even when they are different. Respect begins with self-confidence and is closely linked to empathy, integrity, and honesty.
22	Health and Safety	A state of complete physical, mental, social, and spiritual well-being of all workers, achieved through the protection of occupational health and safety to ensure that workers are free from threats, hazards, and risks, including work-related accidents and occupational diseases, as well as ensuring safety outside of work. This enables individuals to live and work happily within society in terms of physical, mental, social, and spiritual well-being.
23	Inclusion	The acceptance and integration of individual differences within an organization, such as promoting and valuing diversity among employees, creating a friendly, respectful, and inclusive environment, and providing opportunities for employees to participate and engage with the organization.
24	Dignity	Human dignity refers to the inherent qualities, mental integrity, and personal rights that every human being possesses and that must be respected and protected from infringement by others. Any violation of human dignity therefore requires protection and the provision of justice by the state.
25	Gender equality	Gender equality refers to the equal status of women and men in society. To achieve this, social conditions must enable both women and men to equally enjoy and exercise their human rights, as well as provide equal opportunities for participation for all genders.
26	Fair wages	A fair wage refers to remuneration that workers generally accept as just and appropriate for the performance and nature of the work. It is a wage that is commonly practiced within the community

No.	Human Rights–Related Risk Issues in the Business Sector	Description of Risk Issues
		and may represent a level of pay sufficient to sustain the basic livelihood of workers and their families. Such wages should be commensurate with the employee’s capabilities and the work performed.
27	Fair trial	During court proceedings, regardless of the charges, family members, relatives, friends, human rights organizations, the media, and members of the public who are interested in the case should be able to attend and observe the court hearings. Public hearings therefore serve as a mechanism to promote transparency in the exercise of judicial power and to ensure that defendants are guaranteed equal rights to a fair trial.
28	Land rights	Rights of possession, rights of access, rights of use, rights to derive benefits, and transfer of land ownership.
29	Collective bargaining	The act of two or more employees, or a labor union, jointly negotiating with an employer or an employers’ association regarding conditions of employment, welfare, working days and hours, termination of employment, or any other benefits of employers or employees, in order to resolve issues and improve working conditions. Collective bargaining is one of the most important tools for employees, labor unions, employers, or employers’ associations to use in dealing with one another so as to achieve the needs of each party and to resolve or prevent labor problems or disputes. Collective bargaining.
30	Freedom of association	Freedom of association is a right possessed by all workers and employers. It is the freedom to establish and join organizations of one’s own choosing, with the right to select their representatives in order to promote and protect their interests related to work. The principal means of exercising freedom of association is collective bargaining. This fundamental human right arises alongside freedom of expression and forms the foundation of representation and democratic governance.

No.	Human Rights–Related Risk Issues in the Business Sector	Description of Risk Issues
		People should have the right to influence matters that directly affect them; that is, everyone’s voice should be heard and given due consideration.
31	Living Wage	A wage sufficient for a minimum standard of living.
32	Child rights	Child rights are rights that every child possesses from birth. Therefore, no one may deprive, restrict, or limit the lawful exercise of a child’s rights, nor violate the rights of a child.
33	Empowerment	Empowering employees by giving them autonomy and the authority to make decisions or take actions without having to seek approval every time.
34	Freedom of movement	A freedom that does not require prior permission from the state; however, freedom of movement or relocation must be exercised on the basis that it does not cause harm, inconvenience, or violate the rights of others.
35	Strategic lawsuits against public participation (SLAPP)	The filing of lawsuits against individuals or groups who express concerns about issues affecting the community, such as illegal working conditions, environmental impacts, or the use of excessive force by authorities. The plaintiffs are often state agencies or private companies, using existing laws—such as defamation laws—to harass or intimidate individuals or groups who are legitimately expressing their concerns.

Appendix 4: Sources of Human Rights Risk Information Relevant to Business

No.	Source	Organization	Risk Information
1	Business and Human Rights Resource Centre	Business and Human Rights Resource Centre	A list of risks related to business-related human rights violations. It provides a database of human rights abuses, allegations, and corporate responses. Users can access information at the country level, industry level, and individual company level.
2	CSR Risk Check	MVO Nederland	A list of risks related to corporate social responsibility (CSR) issues. Users can access risk information by geographic area and by individual company.
3	Country Reports on Human Rights Practices (U.S. Department of State)	The United States Department of State	Country-specific reports on human rights risks related to both government and business sectors, prepared by the Ministry of Foreign Affairs of the United States.