

# SPI...

## and Sustainable Development



# Good People

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Key Sustainability Issues

Good People Good Products Good Society



## Good Products

## Good Society

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Good Society

- Volunteer Campaign
- Encouraging Employees' Participation in and Creation of Value to Society
- Respect for Human Rights
- Fair Labour Treatment
- Safety and Occupational Hygiene

- Corporate Governance
- Anti-corruption efforts
- Risk Management and Internal Audit
- Ethical business practices
- Responsibility towards consumers
- Environmental, energy, and resource management
- Waste management
- Innovation and disclosure

- Sustainability Communication and Relations
- Education and Learning Activities of School Student
- Religion and Tradition
- Health
- Communities and Social Development
- Other Activities and Sponsorship of Public Benefit Activities

## Message from the Managing Director

Saha Pathana Inter-Holding Public Company Limited operated businesses with the support of all stakeholders. We believe that the achievements of all stakeholders as our own. In order to enable the Company to securely advance towards the fifth decade, the Company is committed to achieving successes through synergy and appropriate sharing for sustainable business development under the **social responsibility policy “Good People, Good Products, Good Society”**. The integrated approach pursuant to the business context is consistent with the **United Nations Sustainable Development Goals (SDGs)**. In the year 2019, the Company pursued a number of undertakings to achieve the objectives, as follows.

**Strengthening the core business**, we seek new investment opportunities that are innovative, outlay 5G network communication technology and expanding the energy business. This is through an alliance to set up a communication network to drive Saha Industrial Park Si Racha to be the first smart city to use 5G technology in the industrial sector which will lead to the support of IoT devices and machinery. Customers will then be able to control their machinery which leads to the improvement in productivity, efficiency and quality in the manufacturing process. In addition, the Company has studied the investment in the renewable energy business (Green Electrons) to manage the renewable energy in the form of Smart Energy Grid in which the Company has great intention to accomplish in the near future. This will provide the energy security and reduce the energy cost for our customers and partners that have been with us at Saha Industrial Park Sriracha.

**Search of new investments in innovative businesses by expanding to the energy sector.** The Company has explore investments in renewable energy, or Green Electons, being a renewable energy management in the form of Smart Energy Grid. The Company is determined to realise this project in the near future in order to secure energy security and to lower customer costs of trading partners also situated in the Saha Group Industrial park at Si Racha.

**Water management.** Due to the limited volume of water from natural sources and the decline or delay in seasonal rainfall, we are faced with a water shortage problem. In order to optimize the use of water, the Company manages water by reusing the central wastewater that has been treated in various activities of the Company that do not have any impact on the community. The Company improves water quality by using ozone technology and CMF (Ultra High Rate Compressible Media Filter). Targets have been set for the reuse of water to enable reductions in the emission of treated wastewater to public water sources.

As a consequence of comprehensive business operations encompassing economic, social and environmental dimensions, along with the cooperation of executive officers and all levels of employees geared towards the sustainable development of the organisation, the Company was selected for inclusion in the list of Thailand Sustainability Investment (THSI) for the year 2019. The Company’s good governance was rated as “excellent” with respect to the assessment of annual general meeting quality, achieving a full 100 score for the 11<sup>th</sup> year. Furthermore, the Company was accredited with a Re-Certification in Thailand’s Private Sector Collective Action Coalition Against Corruption.

On behalf of Saha Pathana Inter-Holding Public Company Limited, I would like to thank all stakeholders for their support in the Company’s business operations and sustainable development. I am truly confident that our physical and mental commitment and the determination of all those concerned in the business operations, after having regard to benefits to the environment, society and the economy, will continue to lead the Company to continued sustainable growth.



(Mr. Vichai Kulsompob)

President

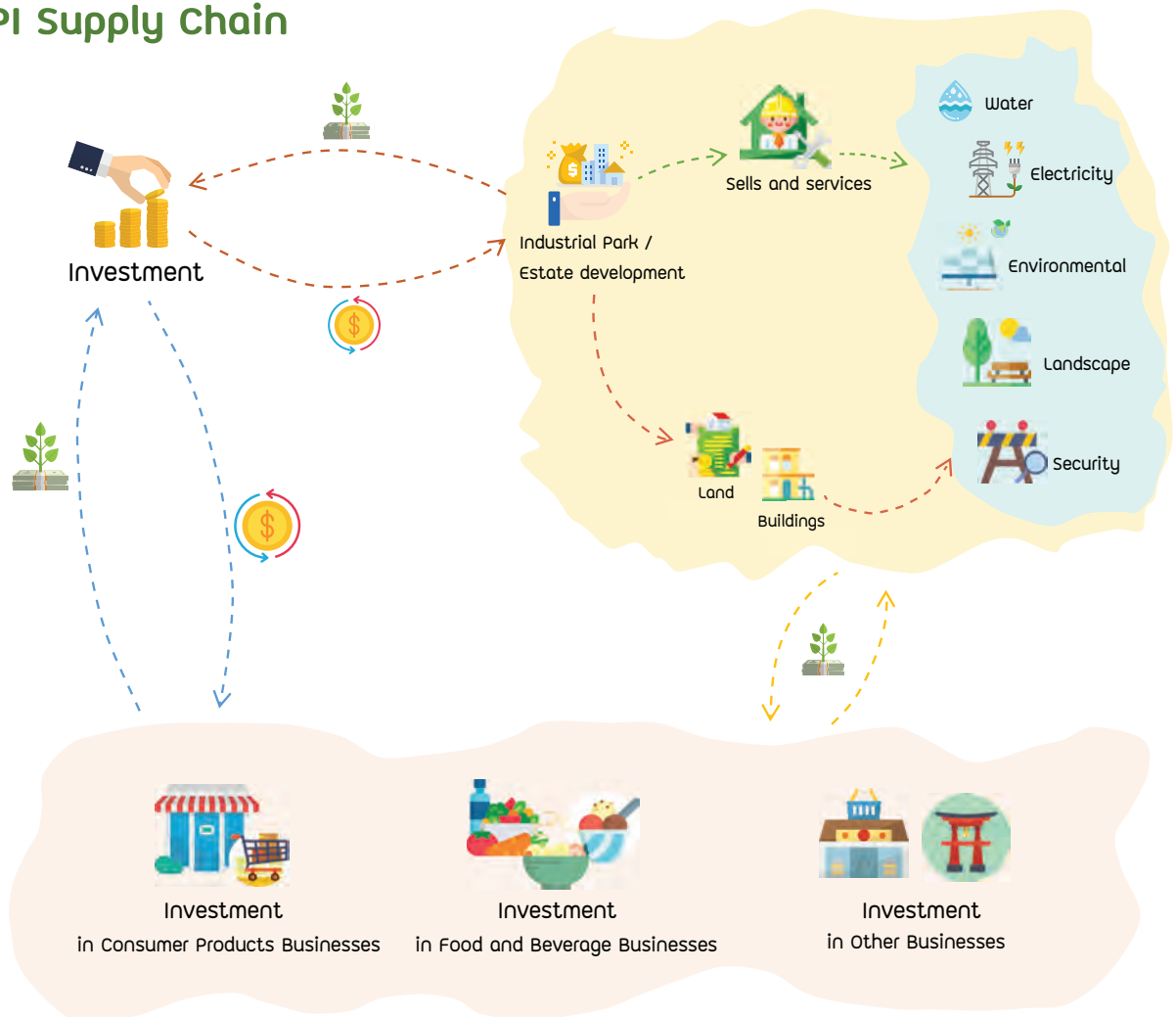


**Headquarter**  
Bangkok

**Registered Capital in SET**  
582,923,188 baht

**Company establishment date**  
5 April 1972

## SPI Supply Chain



Investment in Consumer Products Businesses	Investment in Food and Beverage Businesses	Industrial Park and Investment in Other Businesses
Thanulux Public Company Limited Thai Wacoal Public Company Limited Lion Corporation (Thailand) Limited Saha Pathanapibul Public Company Limited I.C.C. International Public Company Limited S & J International Enterprises Public Company Limited Better Way (Thailand) Company Limited etc.	Thai President Foods Public Company Limited President Bakery Public Company Limited American Food Company Limited Kewpie Thailand Company Limited Khen Mill Foods Company Limited etc.	J-Park Sriracha Nihon Mura Sahacogen (Chonbur) Public Company Limited SUN 108 Company Limited Thai SECOM Security Company Limited Saha Lawson Company Limited Tsuruha (Thailand) Company Limited Saha Komehyo Company Limited DONKI Thonglor Company Limited etc.



## About this Report

Saha Pathana Inter-Holding Public Company Limited recognises the importance of continual disclosure of key sustainable development information. These disclosures include operations pertaining to the economy, society and environment for the period between 1st January – 31st December 2019, and are made available to all stakeholders equally, accurately and transparently.

## Report Methodology

In this Sustainability Report of 2019, the Company adhered to the principle of corporate social responsibility. Key issues on sustainable development have been identified through a materiality assessment exercise. These information are disclosed and complied with the **Global Reporting Initiative (GRI Standard) on Core Option**, and the **Eco Industrial Park Indicator** integrating business context to be in line with the **Sustainable Development Goals (SDGs)**, pursuant to the corporate social responsibility policy “**Good People, Good Products, Good Society**”. The preparation of “**SPL... and Sustainable Development**” was undertaken in strict observance of the organizational culture focused on sustainable development at an international level alongside the Company’s operations and conferring of the greatest return to all stakeholders.

## Business Philosophy

**Business Philosophy**  
 "To conduct a good business, you must disregard self-interest and adhere to ethical practices."

**A GOOD BUSINESS**  
 Seeking benefits or profits is not amoral, but it must be done reasonably while consumers also benefit from good products and services.

**CONSIDER OTHERS**  
 You must also think of the benefits to others, not just your own.

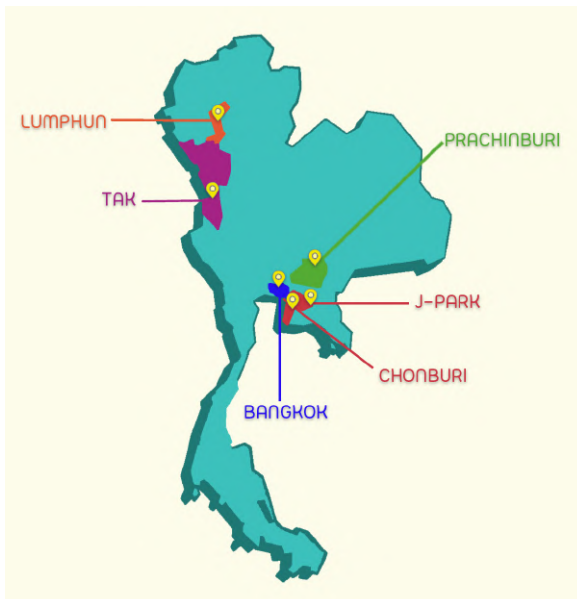
**OPERATE ETHICALLY**  
 You cannot let profitability blind you from morals and ethics.

## Principles

Good People • Good Products • Good Society



## Scope of Report



This sustainability report has been provided to show the outcomes of Company operations relating to sustainability development management and interconnections with issues pertaining to the economy, society and environment. The report was undertaken in accordance with the policy “Good People, Good Products, Good Society” which focuses on operations in line with business activities, visions, missions, goals, organizational values and good governance principles. The scope of this sustainability report has taken into account business relevance, data availability and impact on Company operations under the core business principles, namely investments in consumer product businesses, investments in food and beverages businesses and development of industrial park and other business investments.

## Key Sustainability Issues and Stakeholders

### Procedures for Assessment of Key Sustainability Issues

The Company has identified key issues concerning sustainability after examining data on trends and outlooks of the global situation, the United Nations Sustainable Development Goals (SDGs) and Eco Industrial Park Indicator, demands, expectations and impacts on stakeholders, organisational risk management, vision and reports on significant sustainability issues submitted to the organisation and stakeholders. The Company adheres to the Global Reporting Initiative Standards (GRI Standards).



#### Shareholders

- Reasonable return on investment
- Good Corporate Governance
- Business growth potential
- Social and environment responsibility



#### State Sector

- Encourage the cooperation between the Company and state sector
- Follow the laws and regulation of state sector



#### Communities

- Create occupations and income
- Social and environment caring
- Encourage community activities
- Develop children and future youth in community's schools
- Reduce the impact of operations on the community



#### Employee/ Management

- Reasonable remuneration and welfare
- Stability and progress
- Good quality of life
- Knowledge and skills development



### Customers

- Customers' satisfaction
- Business operation with environmentally friends
- Respond to customer needs

### Business Partners

- Business operation with fairness and transparency
- Consultant and knowledge sharing
- Added Value and sustainability cooperation

### Competitors

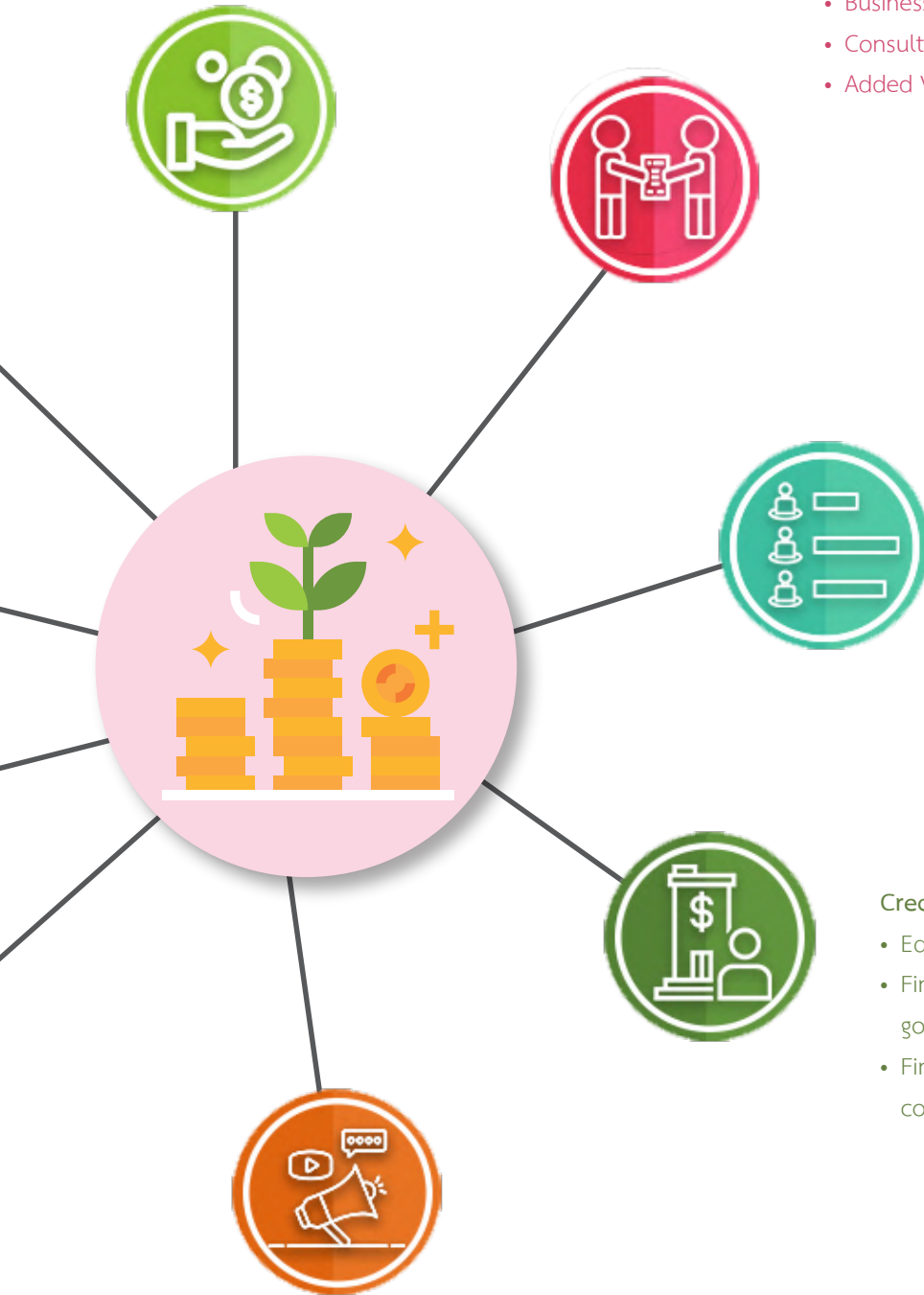
- Doing business under rules of fair Competitive
- Do not damage the reputation of competitors

### Creditors

- Equality and fairly
- Financial statements firmly and good debt repayment
- Financial statements disclosure correctly and timely

### Mass Communication

- Create communication between company and related persons
- Create information / News / events of the company disclosure channels



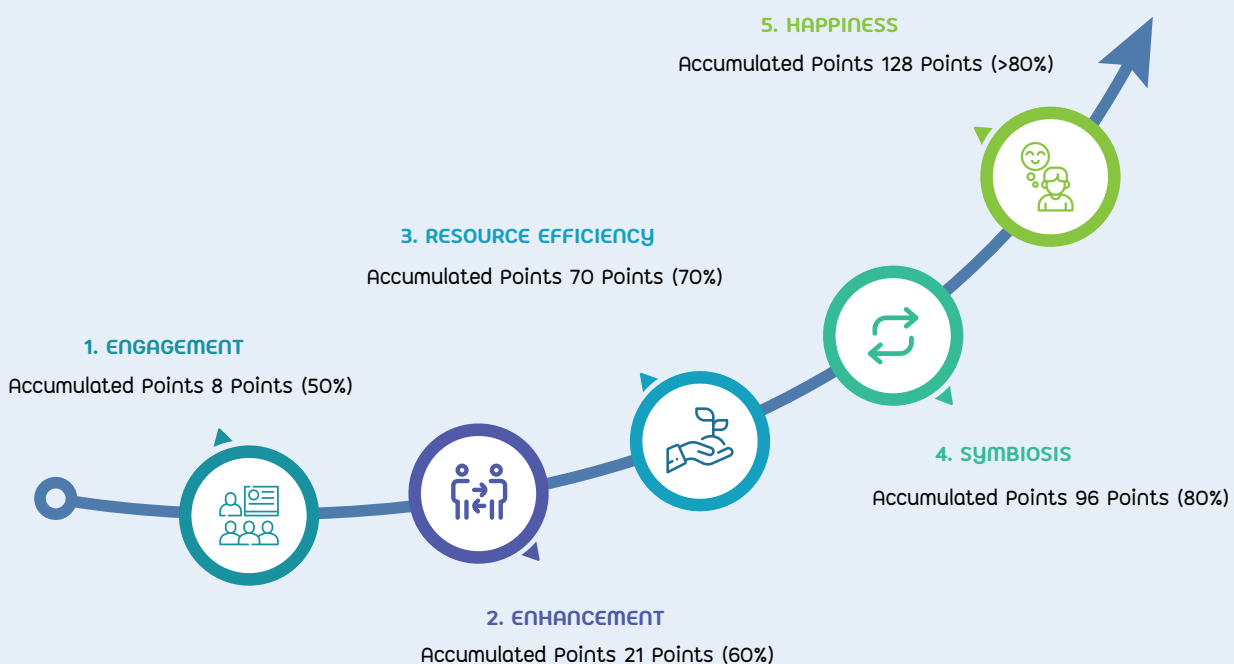
## Eco Industrial Park Index



The development of an **Eco Industrial Park** represents a development in both industrial plants and communities in the vicinity. The industrial park focuses on increasing the efficiency of use of materials and energy through prudent planning and building networks between various industrial plants to increase efficiency, minimize impact on the environment and reduce waste emissions from the manufacturing process, as well as to lower costs and improve profitability and business competitiveness. Furthermore, the Company cooperated with communities in raising qualities of lives and local economies to improve lives and well-being, concurrently with the sustainable growth of industrial plants.

The development of an **Eco Industrial Park** is a mechanism for adding value to the economy by employing measures to prevent pollution from its source, rather than treatment of pollution emitted by the manufacturing process. The measure also creates jobs alongside the raising of environmental quality, which aims to **engage** all stakeholders. The promotion and **enhancement** of Eco Industrial Park involves the environment and safety as well as the **efficient** use base on **symbiosis** industrial system has been developed and designed to replicate the natural eco-system to promote **happiness** towns alongside industries with balanced economy, society and environment, and a sustainable existence to maintain the abundance of natural resources and energy for future generations.

### \*\*Eco-Industrial Park Indicator\*\*



## Sustainable Development Goals : SDGs



At present, Thailand, by the Department of Industrial Works, Ministry of Industry, stipulates the characteristics of an eco industrial city in terms of 5 dimensions incorporating 20 aspects that are interrelated and mutually supportive. Each dimension is connected in a network of activities for development. These dimensions are physical, economy, environment, economy and management.

The Company has continually developed Eco Industrial Park in 2 areas, namely the Saha Group Industrial Park, Si Racha, and Saha Group Industrial Park, Kabinburi, which is consistent with the **United Nations Sustainable Development Goals (SDGs)**, engaging all sectors in building a happy society, minimize social inequality, eliminating poverty, promoting a green economy and allowing environmentally friendly manufacturing and consumption.

## Step in the Assessment of Key Sustainability Issues

### Step 1 : Identifying the Key Issues

The Company considered key business issues in 2019 by taking into account domestic factors, namely reviews of key issues identified after a SWOT analysis of the organisation, corporate risk profile and external factors, namely the **Eco Industrial Park Indicator**, **Thailand Sustainability Investment Index**, **United Nations Sustainable Development Goals (SDGs)** and global mega trends. The Company divided stakeholders into 9 groups and used a variety of communication channels to reach each stakeholder group comprehensively and efficiently.

## Stakeholder Engagement

Frequency	Engagement Approach	Shareholders	Customers	Business Partners	Employee/ Management	Communities/ and Societies	Mass Communication	Competitors	Creditors	State Sector
Annually	Annual general Shareholders meeting	●								
	Giving the rights of shareholders to propose agenda and/ or to nominate candidates to be elected as Directors at the General Meeting of Shareholders	●								
	Annual reporting	●	●	●	●	●	●	●	●	●
	Analyst / Investors meeting with Saha Group	●								
	Pay respect Braham (Saha Group Industrial Parks)	●	●	●	●	●	●	●	●	●
	CEO Update				●					
	Customer satisfaction evaluation		●							
	Employees evaluation				●					
Quarterly	Welfare committee meeting				●					
	Corporate performance announcement through SET website and Company website	●	●	●	●	●	●	●	●	●
Monthly	Environment assessment announcement		●							
Always Accessible	Community Activities		●			●	●			●
	Suggestions through the channel to receive complaints	●	●	●	●	●	●	●	●	●
	Annual report/ SD report	●	●	●	●	●	●	●	●	●
	Company Visit	●	●	●	●	●	●		●	●
	Communication channels Property Marketing Manager Administrative Officer (Community Relations)		●			●	●			●
	E-mail : ir@spl.co.th	●	●	●	●	●	●	●	●	●

### Step 2 : Prioritizing Issues

The Company prioritized sustainability issues for 2019 after taking into consideration the changing business context regarding each key issue identified through the analysis in step 1. The key issues concerning the organisation and stakeholders represented in 2 dimensions obtaining a score between 1-5 were:

1. Impact on the economy, society and environment, including good governance and notable opportunities for the Company's business operations.
2. Issues of interest for stakeholders and the level of influence on decisions taken by the relevant stakeholders.

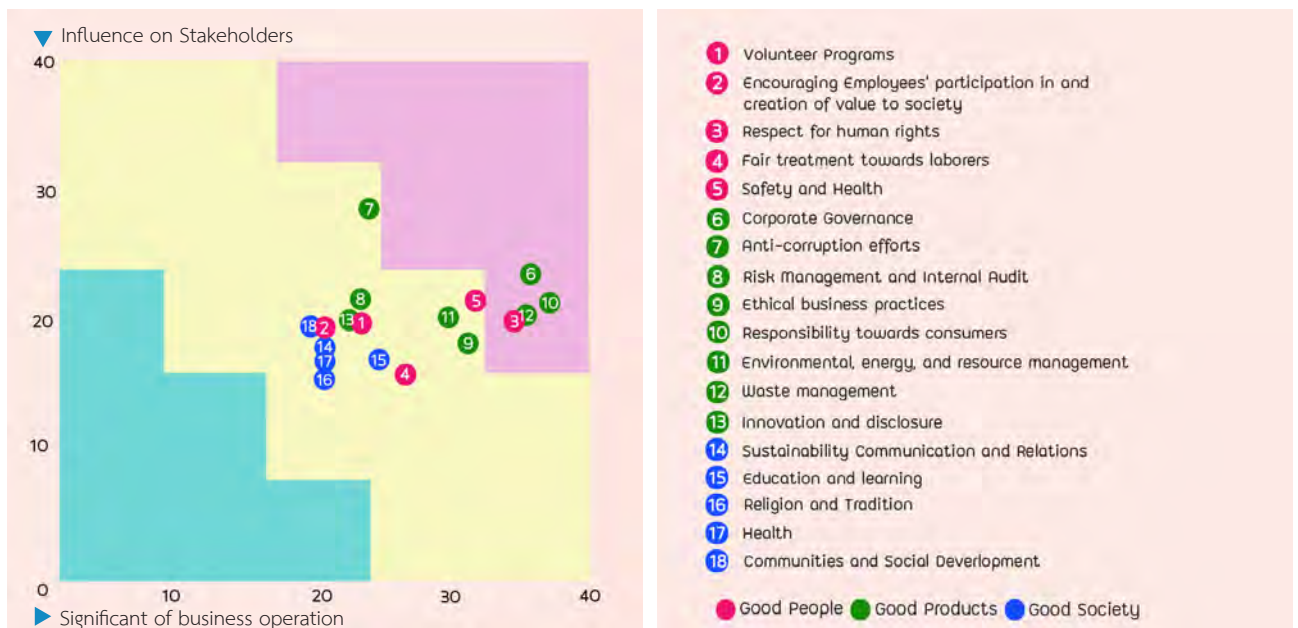
### Step 3 : Review of Key Issues

The Company reviews the comprehensiveness of key issues. In this regard, the Corporate Governance Working Group submits to the Corporate Governance and Risk Management Committee for approval of key sustainability issues under the scope of internal and external impacts of the Company.



Upon an assessment of key issues in 2019, it was found that there were contextual changes in both internal and external factors which affected stakeholder expectations. Nonetheless, the majority of expectations of stakeholders remained the same, being the expectation that the Company could continue to create value. In any event, the sustainability issues approved by the 5th Corporate Governance and Risk Management Committee Meeting No. 3, on 27 February 2020 could be divided into 3 chapters covering 18 issues. After analysis, the Company determined strategies in response to those issues by grouping the issues into the following 3 groups according to the social responsibility policy of “Good People, Good Products, Good Society.”

### The Assessment of Key Sustainability Issues Result 2019



Good People	Good Products	Good Society
<ul style="list-style-type: none"> <li>• Volunteer Programs</li> <li>• Encouraging Employees' participation in and creation of value to society</li> <li>• Respect for human rights</li> <li>• Fair treatment towards laborers</li> <li>• safety and health</li> </ul>	<ul style="list-style-type: none"> <li>• Corporate Governance</li> <li>• Anti-corruption efforts</li> <li>• Risk Management and Internal Audit</li> <li>• Ethical business practices</li> <li>• Responsibility towards consumers</li> <li>• Environmental, energy, and resource management</li> <li>• Waste management</li> <li>• Innovation and disclosure</li> </ul>	<ul style="list-style-type: none"> <li>• Sustainability communication and relations</li> <li>• Education and learning</li> <li>• Religions, local customs and traditions</li> <li>• Health</li> <li>• Community and Social Development</li> </ul>





( Good People )

## Sustainable Development Goals (SDGs)



### Enhancing and Developing Personnel into Good People

Business operations in the era of advancements in economy, society and environment have entered into an era of innovation driven economy (Thailand 4.0). In this era, competition is borderless. Processes are more complex. The Company has to adapt to maintain competitiveness, starting from the recruitment and selection of good people to become a part of the Company. The Company also focuses on the enhancement and development of personnel into good people, along with the honing of knowledge and competencies to build good and proficient persons who share a love for the organisation. Personnel are also encouraged to engage and create value for society. The Company gives due regard to human rights, fair employment, including the safety and occupational hygiene. These driving forces are key to driving the Company towards sustainable success, growth and advancement, consistent with the United Nations Sustainable Development Goals in creating jobs, creating incomes, eliminating poverty, and the betterment of lives.

The development of good people was one of Dr. Thiam Chokwatana's philosophies. His perspective on human resource development was "one of the best resources of the world is "good people". Wherever there are good people, there will be advancement of organisation." The philosophy was pursued in the following projects.

- **Recording Good Deeds of Employees Campaign**

Pursuant to the stipulation of 8 good deeds in 2018, it was found that employees showed interests in good deed activities, generosity, sharing and preservation of religion. In 2019, the Company organised good deed activities for public benefit to encourage and promote employee good deeds towards others. These activities helped employees' understanding of sacrifices, giving, sharing, appreciating the value of human friendship, thus enabling self-development into mindful persons. Good deed networks in society were also extended, e.g. donations of monies and items to various agencies, such as children foundation, Thien Fah Foundation, Ratchavithi Hospital, and Ruam Katanyu/ Poh Tek Tung Foundation.



- **Promotion of Employee Engagement and Societal Value Creation through Volunteer Activities**

The Company held group activities aimed at encouraging the harmony of employees in conferring benefits to communities and society. These activities aid the employees understanding of cooperation for public benefit and charitable actions. In 2019, the Company promoted employee engagement and societal value creation; of manies and items to various agencies, such as children foundation, Thien Fah Foundation, Ratchavithi Hospital, and Ruam Katanyu/ Poh Tek Tung Foundation.





## Charity Runs in 3 Industrial Parks



Saha Industrial Park Si Racha has made donation to Somdej Phra Boromma Rachathewi Na Si Racha Hospital at Si Racha.

Saha Industrial Park Lamphun has made donation Lamphun Special Education Center and Public Relations for Tourism Promotions in Lamphun.

Saha Industrial Park Kabinburi has made donation on the purchase of dialysis machine towards Kabinburi Hospital.



- The Company collaborated with the Center for Research and Warning of Factory Pollution in the Eastern Region, Department of Industrial Works, in undertaking the **Check Dam Project Following Father's Footsteps "Preserving Forests, Building Check Dams, Creating Streams, Reviving Forest Lives"** at the Center for Research and Warning of Factory Pollution in the Eastern Region, Department of Industrial Works, Nong Kang Kok Sub-district, Muang District, Chonburi Province.

- Public benefit activities.** Cleaning communal areas in Ban Rai Nung Community and Ban Rai Nung Senior Persons School, Nong Kham Sub-district, Si Racha District, Chonburi Province.



- Participation in a tree planting and temple cleaning campaign** at Doi Ka Mor Monk's Grounds, Ma Kua Jae District, Muang District, Lamphun Province.



- Reforestation project in honor of 12<sup>th</sup> August**, in collaboration with the communities around the Saha Industrial Parks.



- **Installation of AED devices.**

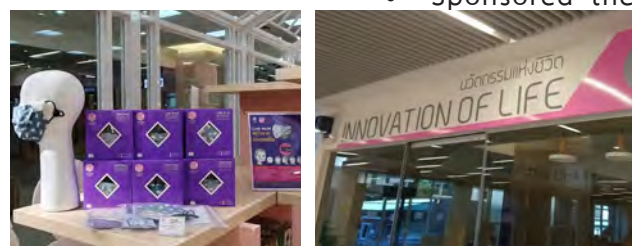
The Company pursues an ideology and promotes well-being and the safety of lives and properties by installing Powerheart AED G3 Automatic (AED) in Saha Group Industrial Parks in 3 provinces, namely Lamphun, Tak and Prachinburi, as well as at the Bangkok Head Office. Employees and the general public have access to the AED devices. Also, in order to confer benefits to communities surrounding the Saha Group Industrial Park at Si Racha, Chonburi Province, the Company donated AED devices to Ban Rai Nung Health Promotion Hospital, Bung Sub-district, Si Racha District, Chonburi Province, as well as provided basic life support training for emergencies, including the use of AED.



The Company appreciates the importance of prevention and assisting persons suffering from sudden cardiac arrest. Hence, training on basic life support and use of AED were organised by Thai Secom Safety Company Limited. The proportion of trained employees increased from 32 percent of all employees in 2018 to 42.44 percent of all employees in 2019.



- Sponsored fire engines and PM 2.5 filtration care masks to alleviate the dust/ smoke problems of Lamphun Province.



- Supporting the development, design and cutting of the cold compress mask "CARE MASK", which was invented by Assistance Professor Dr. Kanaungnit Kingpetch, No. 13043, was granted to Chulalongkorn Hospital. This is the cold compress mask used to be place on the salivary glands, gums, teeth, muscle and chin to reduce pain and swelling of the salivary glands of cancer patients.



## Respect of Human Rights

The Company operates businesses responsibly. There are no restrictions on freedom and differences in ideology, gender, race, religion, civil rights and political rights. Human rights of all stakeholders are respected, including the fundamental right to work of employees. The Company adheres to labour laws, humanitarian principles and equality. In order to ensure that human rights undertakings and treatment of employees are aligned, the Company stipulated policies and guidelines in the business ethics under the heading on non-violation of human rights, as follows:

- There shall be no activities or support of activities which violate human rights.
- Employees are provided with the knowledge and understanding of human rights which are applied to their work operations.
- There are no limitations to independence or differences in ideology, gender, race, religion, politics or other matters. The expression of opinions which could cause conflicts will be avoided.
- Channels shall be provided for Employees who believe that their personal rights have been violated or that they have been treated unfairly to file a complaint with the Company. Such complaints shall be given attention and processed in a fair manner



- Promotion of human rights of employees and contractors in preventing accidents. The Company provides training for contractors operating in the area regularly every year on various topics pursuant to legal requirements, namely, safety, occupational hygiene, laws and regulations on the environment, safety and responsibilities during an emergency.



**Human Rights and  
Treatment of Employees**

**0 Case**

**The Company has recorded no Human Rights Violation**

## Fair Labour Treatment

The Company attaches equal and conforming significance to personnel at all levels. In order to achieve one of the goals of sustainable business, that is to retain proficient personnel in the Company, importance has been given to employees by caring and treating employees fairly in all processes, whether that may be the recruitment and selection of employees, personnel development, assessment of performances and determination of remuneration and welfare benefits of employees, which are competitive when compared to the same industry and leading companies in Thailand.

The Company also maintains a balance between work and life by allowing employees to have a role and participation in the expression of opinions through representatives in **the Welfare Committee**. Such committee would deliberate to find solutions on various matters concerning employers and employees. In addition, employees are given an opportunity to express opinions or suggestions via various complaints channels, such as suggestion box and complaints officers to enhance care of employees, as appropriate.



## Safety and Occupational Hygiene

The Company is committed to operate its business with due care for the management of quality, safety, occupational hygiene and the environment, in full compliance with regulations, laws and preventive measures. This is to prevent and control any potential impact arising from normal circumstances, irregular circumstances and emergency circumstances for current and future businesses. In addition, the Company also has a policy which focuses on prevention by identifying and assessing potential risks of leakage of chemicals or fire in each area.



For Saha Industrial Park Si Racha safety, disaster relief, occupational health and working environment is under the operational care of Pittakij Security Company Limited whom is responsible for the integration and deployment of security full service. This includes the creation of the personnel to have knowledge about safety at work and also any precautionary action to prevent danger, life, body and mind health effectively.

- Fire drill under the fire emergency plan at Saha Group Industrial Park. Fire drills have been conducted under the Emergency Plan of 2019. Those drills were undertaken in the common area of the industrial parks. Events were simulated in customer areas to resolve situations and enable relevant teams to respond to emergencies most rapidly and safely.





- **Drills for chemical leakage.** Owing to the fact that various companies in the Saha Group Industrial Park undertake a variety of businesses and use a number of chemicals in their manufacturing processes, transporting such chemicals into the industrial park, the Company therefore has an emergency plan to prepare for such a situation. With regard to an event of leakage of a hazardous chemical within the common area of the Saha Group Industrial Park, an environmental team, response team, chemical and hazardous waste recovery team, including various other coordinators have jointly participated in drills to develop an understanding and an ability to respond to emergencies in the fastest and safest manner.



- **Prevention and Monitoring of Coronavirus Spread**



At present, the coronavirus epidemic has spread to several countries. The trend continues to indicate more infections. Due to concern for Company employees, the Company monitors the situation closely and installed measures to prevent the spread of the coronavirus COVID-19. The Company also seeks the cooperation of all employees to comply with the prescribed measures for the better health of all.







## Good Governance

### Sustainable Development Goals (SDGs)



#### Good Governance

The Company has prepared and disseminated good governance principles in accordance with the 8 principles of good governance of the Office of Securities and Exchange Commission. In 2019, the Company held campaigns to provide knowledge and understanding on good governance for executive officers and employees, including building awareness of such matter, such as by giving knowledge and understanding on good governance to new employees during orientation to ensure awareness and proper implementation, publication of good governance principles on the Company website, and dissemination of good governance principles in the form of video animations to shareholders during shareholders meetings.



- Seminar on Roles of Listed Companies in Sustainable Development

#### Combating Corruption

The Board of Directors is determined to operate businesses and is aware of the importance of governing the organisation honestly, transparently, fairly and accountably. This is regarded as a value in the organisation that has been embedded into the Company's culture. The Company adheres to good governance principles, ethics and business codes of conduct in securing the confidence of investors and all stakeholders, as well as enhance competitiveness and promote sustainable growth.

In display of the commitment to combatting corruption in accordance with anti-corruption policies, the Company pursues a policy of declining gifts. The Company issued letters requesting cooperation in not conferring gifts to executive officers or employees during the New Year festival to customers, trading partners and related persons to avoid acts which could be counter to the corruption combatting policies. The Company also promotes the treatment of stakeholders concerned in the Company's businesses on the basis of fairness and equality. Measures have been provided for complaints and clues, including protection for whistle-blowers and clue providers, which are followed up and examined continuously to ensure greater effectiveness in operations connected to the Company and consistency with Company procedures on giving clues. In 2019, the Company did not receive any complaints on its operations and did not detect any corrupt practice that would be detriment to the Company's sustainability. In addition, the Company subscribed as a member of the Private Sector Collective Action Coalition against Corruption (CAC).



- Expand the alliance network on anti-corruption toward our partners by jointly declaring the intentions in order to join the anti-corruption on 25 July 2019.



- “Anti-Corruption Day 2019” event under the concept “Combined Volunteer Anti-Corruption Force” on 6th September at Bangkok International Trade and Exhibition Center (BITEC)



### Complaints in 2019

**0** complaint

A whistleblower channel has been made available, but there were no submissions at all in 2019.

inform them of our Gift Policy, in which our management and employees are prohibited from receiving new year's gifts.



- Board of Directors, executives and employees attended a special lecture on "Anti-Corruption Coalition and Sustainable Business Development" on 7 August 2019.



- Posters to publicize complaints channels and No-Gift Policy.



Send notification letters requesting the cooperation, to inform on important information regarding employees misconduct and inappropriate behavior towards partner companies.

## 5 Achievement Awards from Good Governance Organisation



An “Excellent” overall rating under the Corporate Governance Report of Thai Listed Company 2019 compiled by the Thai Institute of Directors (IOD).



The Company has been selected as 1 of 100 listed companies that have been exemplary with respect to the environment, society and governance.



The Company is accredited by the Governing Committee as member of the Thailand's Private Sector Collective Action Coalition against Corruption.



The Company has been listed in the Thailand Sustainability Investment (THSI) by the Stock Exchange of Thailand.



The Company was awarded the full 100 score for shareholders annual general meeting of 2019 (AGM Checklist) by the Thai Investors Association.

## Fair Business Operations

The Company has a personnel policy which attaches equal and equitable importance to personnel at all levels under a strategic management which builds business competitiveness and respond to changes at present and in the future. In all events, the Company realises and promotes knowledge, ability and skills of employees to increase expertise, as well as to improve attitudes and habits, which would aid the Company's sustained growth and advancement. The Company also provides welfare and other suitable benefits to employees, such as medical allowances and provident fund.



- The Company shall avoid transactions that may lead to a conflict of interest. In the event that a conflict of interest has arisen, the Company must deal with it prudently and reasonably.
- The Company shall operate within the framework of fair competition with regard to the code of conduct and business competition laws of the country in which the Company invests.
- The Company shall refrain from supporting any activity that may infringe upon intellectual property or copyright.

- The Company shall provide an efficient and effective system of internal control and checks and balances to prevent corruption or participation in corruption.
- The Company shall instill an awareness, value and attitude of honesty and compliance to laws and regulations among directors, executive officers and employees.

### Responsibility Towards Consumers

The Company realizes that the satisfaction and confidence of consumers are key to the Company's sustainable success. Hence, the following policies and guidelines have been prescribed.

- The Company shall manufacture and distribute products and services that are environmentally friendly and safe for consumers.
- The Company's businesses shall be operated with commitment to developing goods and services, introducing innovations, and adding value to goods and services in order to continuously meet customer demand, along with the disclosure of critical information needed for decision-making without concealment or distortion of facts.
- The Company's businesses shall be operated in an honest, earnest, and just manner. No action shall be taken to violate customers' rights. Moreover, consumer data shall be treated with confidentiality and shall not be wrongfully exploited for personal gain or the benefit of a related person.
- The Company shall never demand, receive, or consent to the direct or indirect receipt of any property or other dishonest benefit from a customer.
- The Company shall adhere to trade agreements. Whenever adherence is not possible, customers shall promptly be notified in order to jointly find a remedial measure and to prevent losses.
- The Company shall provide communication channels by which customers are able to file complaints to the Company. Complaints shall be processed with care and dealt with fairly.



The Company and Saha Group's companies has organized the annual Saha Group Fair continuously to give back to society. At the fair, products are sold directly to consumers at special prices. These fairs have also been extended to Saha Group industrial park



The Saha Group's goal is to promote the use of products made in Thailand by Thai people for Thai people, in which the logo appears on products of Saha Group

The Company provide communication channels to serve any information, express opinions and complaints :

Property Marketing Manager

Administrative Officer (Community Relations)

Tel. 038-480-444

e-mail address : Amphol@spi.co.th

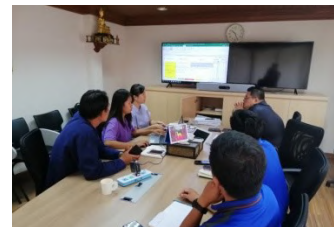
: Chalita@spi.co.th

Company's Website : www.spi.co.th



## Management of the Environment and Energy

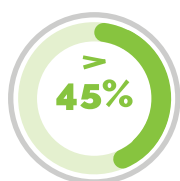
The Company focuses on the management of good environmental quality as well as the reduction or prevention of pollution and the efficient use of resources and energy. There is strict compliance of laws and regulations of relevant agencies, and adherence to the international quality management standard (ISO 9001), environmental management system (ISO 14001) and energy management system (ISO 50001). There is an ISO 9001 and ISO 14001 working group responsible for preparing, inspections and monitoring of the operations of quality management system and environmental management system. There is also an ISO 50001 working group responsible for preparing, inspections and monitoring of energy management system. In addition, there are training for all levels of employees to promote proper understanding of the environment and energy.



### • Water Management

The Company manages water under the 3Rs strategy in order to reduce water consumption starting from the initial processes. As a consequence, the Company has been able to reduce waste water emissions from various activities and there are controls, monitoring and inspections of wastewater treatment and water quality of treated water. The Company employs a number of technologies, such as the Membrane Batch Reactor (MBR) and ozone water quality treatment system. Therefore, we can be confident of the quality of water after treatment as meeting the prescribed quality standards. Targets for treatment of wastewater emitted from industrial plants by the treatment process, using the central wastewater treatment systems of Saha Industrial Parks in Si Racha, Kabinburi and Lamphun, that are used for watering plants in the green zone are set at the proportions > 30%, >40% and >90% respectively so as to reduce the emission of wastewater from the treatment system to public water sources (Reduce).

### Percentage of wastewater were treated and reused for purpose in green areas



Saha Group's Industrial Parks

**Si Racha**



Saha Group's Industrial Parks

**Kabinburi**



Saha Group's Industrial Parks

**Lamphun**

In 2019, the Company used wastewater from industrial plants that were treated by the central wastewater treatment facility of Saha Group Industrial Parks in Si Racha, Kabinburi and Lamphun for watering plants in the green zone in the proportions > 45%, >80% and >100% respectively.



Industrial Park	Green Zone (rais)
Si Racha	540
Kabinburi	188
Lamphun	369



- Improvement of water quality through the use of Ozone technology at Saha Group Industrial Park, Si Racha.

At present, it is found that raw water from Huay Yai Creek has a higher level of contamination. It is therefore necessary to improve the quality of such raw water prior, the Company was able to lower raw

water costs in the production of tap water by approximately 7.5 million baht per year, since the Company was able to reduce the purchase of raw water from East Water Public Company Limited, as follows:



Total of raw water  
2,725,243 (m<sup>3</sup>)



Reduction in Use  
of East Water  
1,518,110 (m<sup>3</sup>)



Cost saving of  
Raw water management  
7,590,550 Baht

**Comparison Table of the Costs of Untreated Water for Producing Tap Water**

Non-Use of Ozone (m <sup>3</sup> )			Use of Ozone (m <sup>3</sup> )				Reduction in Use of East Water (m <sup>3</sup> )
Huay Yai	East Water	Total	Huay Yai	East Water	Ozone	Total	
389,299	<u>2,335,944</u>	2,725,243	389,299	<u>817,534</u>	1,518,110	2,725,243	<u>1,518,110</u>

\*\* Water quality enhancement by Ozone technology used to improve the quality of raw water from Huay Yai

As for the year 2020, the eastern regions in 3 provinces, namely Chachoengsao, Rayong and Chantaburi, suffered from drought conditions. 9<sup>th</sup> Region Irrigation Office, Chonburi Province, implemented a measure to control the volume of use of raw water by all sectors to ensure sufficient supply prior to seasonal rain in the area. As a consequence, East Water Public Company Limited controlled distribution of raw water to Saha Group Industrial Park, Si Racha. Due to the aforesaid reason, the Company also experimented the use of Ultra High Rate Compressible Media Filter (CMF) technology.

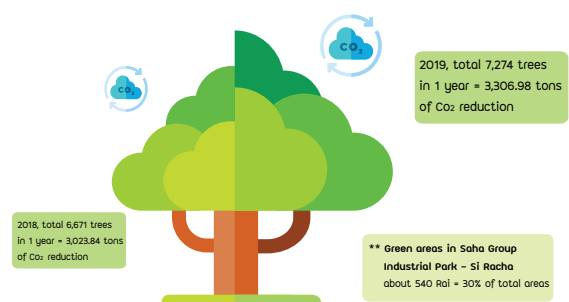
Moreover, the Company implemented measures for managing sediments in treated wastewater by recycling to reduce pollution from such sediments in wastewater and managed sediments (see details under the heading on research and development for sustainability).

- Reduction of Carbon Dioxide (CO<sub>2</sub>) Emissions and Management of Air Quality

At present, the climate change crisis are consequences of human activities which alter the composition of the earth's atmosphere, directly or indirectly. There is also an increase in swings of natural weather patterns. Human activities cause emissions of greenhouse gases, namely carbon dioxide, methane, nitrous oxide, etc. The continuous emission of such gases to the atmosphere in significant amounts causing a Greenhouse Effect affects the changing energy balance. The surface temperature of the earth increases in what is known as global warming. This problem affects not only Thailand, but it presents a global problem affecting all lives.

The Company appreciates this problem by providing a green zone within the Saha Group Industrial Park.

**Green areas allocation  
in Saha Group Industrial Park – Si Racha**

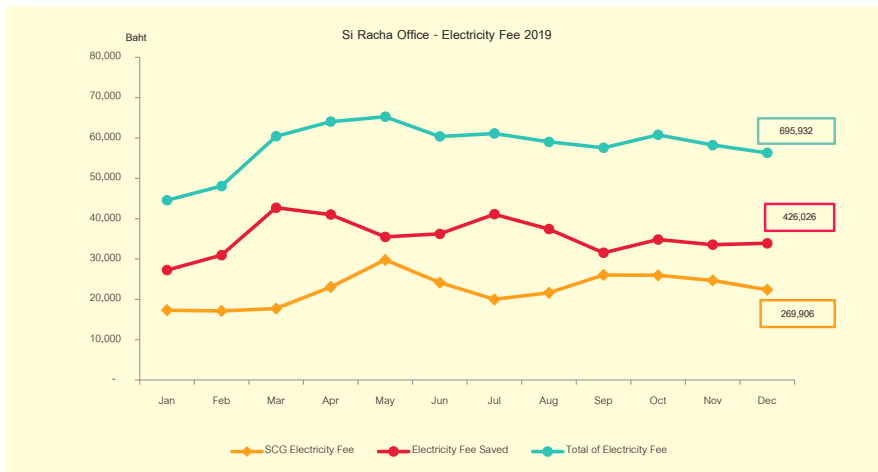




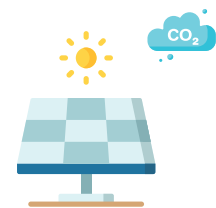
The Company also installed solar cells on rooftops of buildings to lower the emission of carbon dioxide as well as promoted the use of clean energy. A work plan has been established in the Smart City Project of Saha Group Industrial Park, Si Racha, comprising the installation of 24.5 megawatt solar rooftop, installation of floating solar 500 kilowatt, installation of 5 EV Charging Stations, installation of energy storage system 500 kilowatts, and management of Smart Microgrid Management and Block Chain.

- **Installation of Solar Rooftop 24.5 MW.**

Solar Rooftop installed on Si Racha Branch Office building (96.39 kilowatts) in 2019. The Company was able to save approximately 426,026 baht in electricity costs.

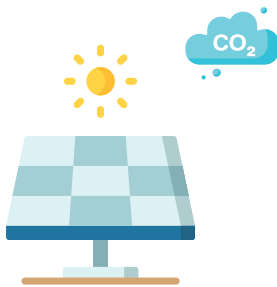


Solar Rooftop on Si Racha Branch Office Building with capacity 96.39 Kilowatts



CO<sub>2</sub> emissions reduction  
246.26 tons/year

Solar Rooftop on Factory Outlet with capacity 299 Kilowatts

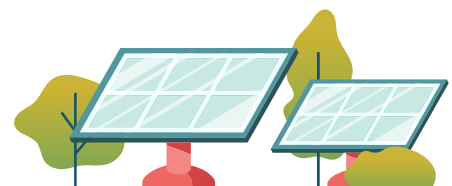


CO<sub>2</sub> emissions reduction  
429.95 tons/year

Solar Rooftop on Factory Outlet with a capacity of 229 kilowatts



Solar Rooftop on rented warehouses (SME) with a capacity of 4.14 Megawatts



## Research and Development for Sustainability

### • Disposal of Residues and Waste Material



The Company systematically manages industrial residue and operates through an environmental working group responsible for driving operations. The Company also continually monitors the management of residual waste from its source to disposal process. The 3Rs (Reduce, Reuse, Recycle) strategy has been applied with particular focus on reducing use, reusing and recycling in order to

reduce the amount of waste disposals and reduce waste landfills with the greatest efficiency and effectiveness.

Research has been undertaken on the use of sediments from central wastewater treatment facility in the Saha Industrial Park, Si Racha, for the production of soil amendment additives in accordance with the standards of the Department of Agriculture in collaboration with Kasetsart University.

This project has enabled cost reductions in the Studies conducted between the years 2017– 2019 showed that soil amendment additives produced from sediments in the central wastewater treatment facility did not affect the soil properties and other relevant factors, such as tree

height, trunk diameter and greenness of leaves when compared to general fertilizers. Approval of the Industrial Waste Management Division is pending (see further details under the heading on promotion of efficient use of resources).

In 2019, Saha Group Industrial Park, Lamphun, launched studies on the decomposition of wastewater treatment by earthworm activities, production of soil amendment additives from water hyacinth in the wastewater treatment facility, and the production of soil amendment additives from leaves and weed, as follows:

### • Studies on use of soil amendment additives from the decomposition of wastewater sediments

At present, the central wastewater treatment facility at Saha Group Industrial Park, Lamphun, holds 1,900 kilograms of sediments pending disposal. Therefore, the Company seeks to improve the efficiency of disposing sediments in the wastewater treatment facility and minimize the impact on wastewater quality released by the facility, as well as to lower the costs of disposing wastewater sediment in the event of the Company releasing the sediment residue outside the Saha Group Industrial Park, which stands at approximately 20,700 baht. These costs could be lowered. In 2019, the Company experimented with the use of soil amendment additive obtained from the decomposition of dried and wet (earthworm urine) wastewater sediment in a kale field.



Acaacia Mangium Wild



Eucalyptus



Cassava





100 kilograms of fresh water hyacinth equals 18.5 kilograms of dried water hyacinth.

- **Production of soil amendment from water hyacinth in the wastewater treatment system**

The central wastewater treatment facility at Saha Group Industrial Park, Lamphun, is a treatment system which adds air with an artificial lake. This treatment adds oxygen and absorbs nutrition, such as nitrogen, phosphorus and potassium by water plants (water hyacinth). The artificial lake contains constant growth of water hyacinth. It was therefore necessary to remove water hyacinth from the wastewater treatment system. These removed water hyacinth could be utilized. There was thus a conceptualization of using the water hyacinth to produce soil amendment for most beneficial use in the Industrial Park area. In addition, Dr. Thiam Chokwatana's Sufficiency Agriculture Project uses organic fertilizer, utilizing approximately 5 tons per year. If such soil amendments were used, the costs of organic fertilizers could be reduced.

- **Producing soil amendment from leaves and weeds**

The Company has utilized leaves and weeds by composting without turning the pile. Soil additives in the amount of 12,350 kilograms were obtained from **activities relating to the management of waste and residue in the Saha Group Industrial Park, Lamphun.** The production of soil amendment additives from water hyacinth in the wastewater treatment facility enabled reduction of organic fertilizer costs by 5,600 baht (cost of organic fertilizer was 5.60 baht/kilogram, utilizing 1,000 kilograms), and production of soil amendment additives from leaves and weeds collected within the Saha Group Industrial Park, Lamphun, enabled the reduction in purchases of organic fertilizer by 70%, or approximately 19,600 baht.



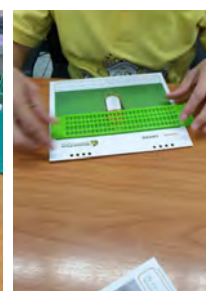
In addition to producing the aforesaid soil amendment, the Company plans to collaborate with business allies in reusing office supplies under the 3Rs principle, e.g.

► **Donation of staples and aluminum rings** for producing crutches, canes and walkers for disabled and elderly persons, or for producing components of prosthetic legs for disabled persons.



◀ **Waste management campaign**, in proper waste sorting by plastic and non-recycle.

▼ **Donation of old desktop calendars** to the Bangkok School for the Blind, operated by the Foundation of the Bangkok School for the Blind under the Royal Patronage of H.M. the Queen, for use by the blind as writing paper or braille.







## Sustainable Development Goals (SDGs)



The Company conducts business with full responsibility towards the social and environmental impact of the community in the area which may occur through our Company conducting business with continuous development within the community. Through responding to the needs of the interested parties including improving the quality of life for the communities and societies for a sustainable self-reliance in support of the changes in the economic, social and cultural that will occur from the industry growth in the future. The promotion on efficient use of resources, environmental preservation cooperation, job creation, income creation through education and healthcare. The communities will progress through various activities in accordance to the criteria and indicators of an Eco Industrial Park which are divided in the following activities below:

### Community and Social Development (Social and Community Responsibilities)

- Quality of lives of community members
  - Support of elderly and bedridden disabled persons in the communities surrounding the Saha Group Industrial Park.

Support and promote public benefit activities in the communities and municipalities by conducting field investigations to identify assistance needs of elderly and bedridden disabled persons. Examples of support include financial sponsorship of the municipality in undertaking a project to build physiotherapy equipment for bedridden disabled persons and provision of adult diapers and other essentials for the elderly.



- Kaset Fair at Saha Group Industrial Park, Lamphun



- Job promotion for community members. Communities were provided with areas for selling community products such the Saha Group Fair and weekend markets.



- Producing brooms from grass flowers in collaboration with Ban Nong Kroh Community, Wangdan Sub-district, Kabinburi District, Prachinburi Province. This activity boosted the distribution of earnings to communities.



- Promotion of lamp



- Project for propagation of fruit trees by grafting with the District Agricultural Officer.



- Investment opportunities on Company premises.

#### Starbucks Coffee



#### Chinese Traditional Medicine



#### Samitivej Clinic, Saha Group



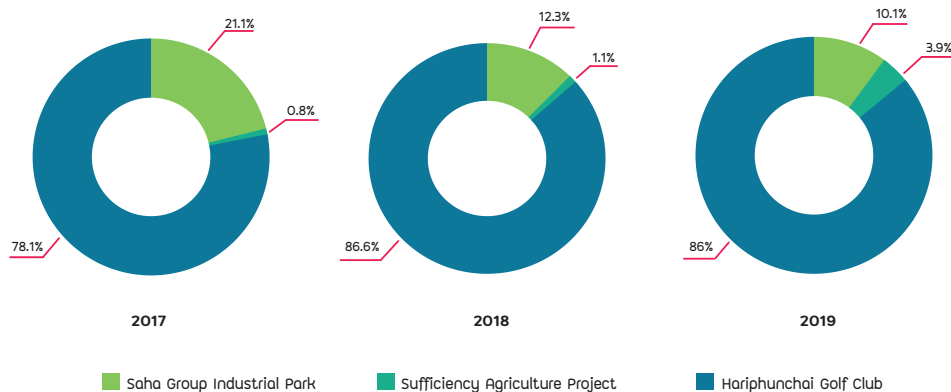
- Sufficiency Agriculture Project by Dr. Thiam Chokwatana

Saha Group Industrial Park, Lamphun, has a policy of not emitting any wastewater externally. For this reason, wastewater is treated and reused in 3 activities, namely, reuse in the industrial park, sufficiency agriculture project by Dr. Thiam Chokwatana, Lamphun Province and Haripunchai Golf Club. In 2019, the volume of water treated at the central wastewater treatment facility was 1,126,921 cubic metres. The Company reused all of the treated water and also sold the remaining treated water to increase revenues of Saha Group Industrial Park, Lamphun. In 2019, the Company generated revenues from sales of treated water in the amount of 33,564 baht.

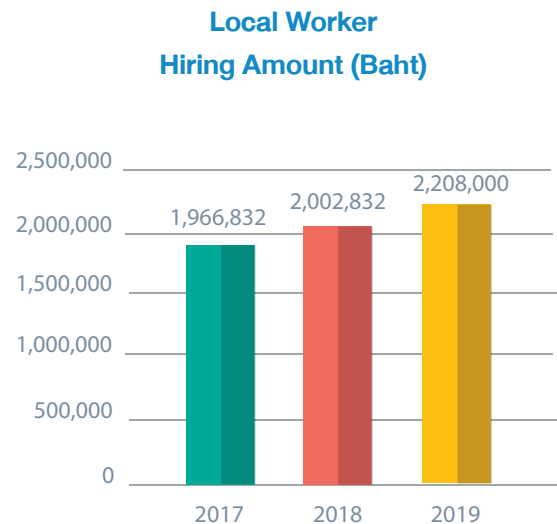
Unit: Cubic Metres

Area of water usage	Year	2017	2018	2019
Reuse in the industrial park		121,241	137,005	121,241
Sufficiency Agriculture Project		4,605	121,241	121,241
Haripunchai Golf Club		447,984	121,241	389,299

Wastewater Data 2017 – 2019



The Sufficiency Agriculture Project by Dr. Thiam Chokwatana within the Saha Group Industrial Park, Lamphun, has the objective of becoming a center for agricultural learning through the use of treated wastewater. This project shows that the industry, environment and communities could coexist through the application of the sufficiency economy philosophy as a guide for developing the industry concurrently with management of the environment and sustainable coexistence with communities. The Sufficiency Agriculture Project by Dr. Thiam Chokwatana has generated revenues for communities through hires for work in communities to care for the project areas.

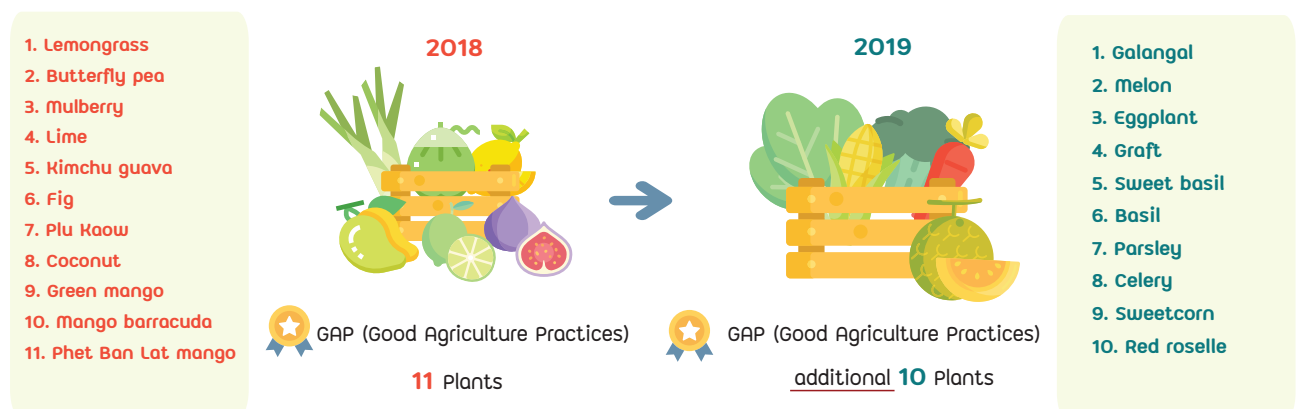


In order to show that treated water could safely be used for growing plants in the Sufficiency Agriculture Project of Dr. Thiam Chokwatana, Lamphun Province, the Company proceeded to apply for a Good Agricultural Practices (GAP) certification. In other words, agricultural practices yield good quality products consistent with the prescribed standards, high yields, good value for investment and the production process must be safe for both the farmers and consumers. The use of resources must yield the greatest benefits, giving agricultural sustainability and not polluting the environment.

These principles were prescribed by the Food and Agricultural Organisation (FAO). In 2018, a total of 11 plants were certified, namely lemon grass, butterfly pea, plu kaow, coconut, kimchu guava, fig, mulberry, green mango, mango barracuda, phet ban lat mango and lemon.

In 2019, another 10 plants received certification, namely melon, eggplant, sweetcorn, red roselle, galangal, basil, sweet basis, celery, parsley and graft, bring the total of certified plants to 21.

### "Good Agriculture Practices (GAP)"





### Project Operation Results Visitors



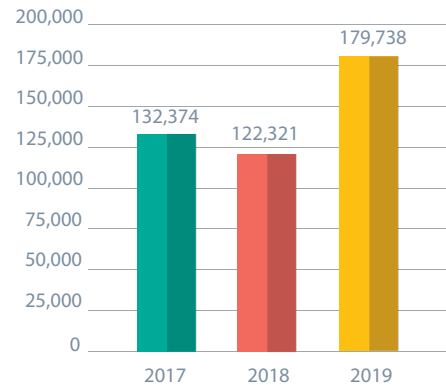
The Sufficiency Agriculture Project of Dr. Thiem Chokwattana at the agricultural learning center Lamphun Province was visited by students, state and private sector agencies totaling 67 groups comprising 5,958 persons.

In 2019, the Company entered into a Memorandum of Agreement with the Lamphun Muang District Livestock Office on Promotion and Preservation of Lamphun White Cows and Development of Livestock Professions. Under this agreement, male and female breeds of Lamphun white cows were distributed and livestock professions were developed. One pair was given to each farmer. The Company distributed a total of 2 pairs to farmers and distributed 1 pair to the Lamphun College of Agriculture and Technology for use in studies and rearing of students majoring in livestock studies.



Products from the Project of Dr. Thiam Chokwatana were distributed via sufficiency stores and booths in various fairs, such as the ICC Fair Chiang Mai and Saha Group Fair Lamphun. During the years 2017 – 2019, a total amount of 434,433 baht was earned.

### Project Operation Results Sales Volume (Baht)



Saha Industrial Park, Lamphun, donated funds to the Special Education Center of Lamphun Province and Publicized the Promotion of Tourism in Lamphun.

### Communications and Public Relations on Sustainability

- Communications Meeting on “Public-Private Cooperation in Saha Group” (Communities/Municipalities/Companies)

This meeting was held amongst companies in the Saha Group Industrial Park, communities and government agencies under the meeting to pic “Public-Private Cooperation in Sahapat Group, Labour Relations, Environmental and Safety Networks. Meetings were held every 3 months, providing an opportunity for communities, government agencies, and companies in the group to share news and information and make proposals.



- Meeting with local government agencies (municipalities). Meetings were held with communities by local municipalities. The Company attended these meetings to obtain news and information and disseminate Company news to other attendees.



- Field trips through observation of workplace. Provide community, government agencies and affiliated companies in joining the meeting and company study site visit at Saha Industrial Park at least one time per year.



## Education and Learning Activities of School Students

Student field trip to factories.



Promotion and enhancement of education for students of Thai Kasikorn Songkroh School.



campaign (traffic officers mentoring youth) at Thai Kasikorn Songkroh School.



Scholarship Award at the Annual Brahma Workshop Ceremony.



Children's Day Activity





## Religion and Tradition

- Sponsorship of kathin/robe giving ceremonies in nearby communities.



- Support and promotion of Songkran day activities of the municipality.

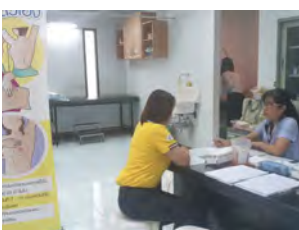


- Participation in the rice growing activity, welcoming rice and harvesting rice of the municipality, water users and community members as a means of building awareness of ancient traditions amongst the younger generation.



## Health

- Screening for cervical/breast cancer.



- Blood donation



- Sports for the promotion of health and relations with surrounding communities.





- Sponsorship of mobile medical check- up units in communities surrounding the Saha Group in collaboration with the Laem Chabang and Chao Phraya Surasak Municipality mobile public health units.



- Charity Run “Saha Group Praprom Charity Run 2019”



- Saha Health Promotion and Safety Enhancement Campaign (Songkran Festival)



### Other activities and sponsorship of public benefit activities undertaken with communities/government

- Pracharat Saha Group in Harmony



- Dog housing project and month grants of dog food to the dogs and cats shelter in the areas of Saha Group Industrial Park.



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GRI 403	Occupational Health and Safety	403-2	Hazard identification, risk assessment, and incident investigation	30
GRI 403	Occupational Health and Safety	403-3	Occupational health services	238 – 239
GRI 403	Occupational Health and Safety	403-4	Worker participation, consultation, and communication on occupational health and safety	238 – 239
GRI 404	Training and Education	404-1	Average hours of training per year per employee	47 – 48
GRI 404	Training and Education	404-2	Programs for upgrading employee skills and transition assistance programs	47 – 48
GRI 404	Training and Education	404-3	Percentage of employees receiving regular performance and career development reviews	47 – 48
GRI 405	Diversity and Equal Opportunity	405-1	Diversity of governance bodies and employees	82 – 83, 86, 203 – 212
GRI 405	Diversity and Equal Opportunity	405-2	Ratio of basic salary and remuneration of women to men	N/A
GRI 414	Supplier Social Assessment	414-1	New suppliers that were screened using social criteria	71 – 72
GRI 414	Supplier Social Assessment	414-2	Negative social impacts in the supply chain and actions taken	N/A
GRI 103	Management Approach	103-2	The management approach and its components	N/A



GRI Standard				
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GRI 412	Human Rights Assessment	412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	79 – 80, 237
GRI 412	Human Rights Assessment	412-2	Employee training on human rights policies or procedures	N/A
GRI 406	Non-discrimination	406-1	Incidents of discrimination and corrective actions taken	237
GRI 407	Freedom of Association and Collective Bargaining	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	237
GRI 408	Child Labor	408-1	Operations and suppliers at significant risk for incidents of child labor	N/A
GRI 409	Forced or Compulsory Labor	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	N/A
GRI 410	Security Practices	410-1	Security personnel trained in human rights policies or procedures	237
GRI 411	Rights of Indigenous Peoples	411-1	Incidents of violations involving rights of indigenous peoples	N/A
GRI 412	Human Rights Assessment	412-1	Operations that have been subject to human rights reviews or impact assessments	N/A
GRI 414	Supplier Social Assessment	414-1	New suppliers that were screened using social criteria	N/A
GRI 414	Supplier Social Assessment	414-2	Negative social impacts in the supply chain and actions taken	N/A
GRI 103	Management Approach	103-2	The management approach and its components	N/A
GRI 413	Local Communities	413-1	Operations with local community engagement, impact assessments, and development programs	230
GRI 413	Local Communities	413-2	Operations with significant actual and potential negative impacts on local communities	251
GRI 205	Anti-corruption	205-1	Operations assessed for risks related to corruption	240 – 241
GRI 205	Anti-corruption	205-2	Communication and training about anti-corruption policies and procedures	240 – 241
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## GRI Standard

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GRI 415	Public Policy	415-1	Political contributions <a href="https://www.spl.co.th/storage/corporate-governance/anti-corruption/20190604-spl-anti-corruption-policy-th.pdf">https://www.spl.co.th/storage/corporate-governance/anti-corruption/20190604-spl-anti-corruption-policy-th.pdf</a>	
GRI 206	Anti-competitive Behavior	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	71
GRI 419	Socioeconomic Compliance	419-1	Non-compliance with laws and regulations in the social and economic area	N/A
GRI 414	Supplier Social Assessment	414-1	New suppliers that were screened using social criteria	N/A
GRI 414	Supplier Social Assessment	414-2	Negative social impacts in the supply chain and actions taken	N/A
GRI 103	Management Approach	103-2	The management approach and its components	N/A
GRI 416	Customer Health and Safety	416-1	Assessment of the health and safety impacts of product and service categories	30, 80, 238 – 239
GRI 416	Customer Health and Safety	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	N/A
GRI 417	Marketing and Labeling	417-1	Requirements for product and service information and labeling	N/A
GRI 417	Marketing and Labeling	417-2	Incidents of non-compliance concerning product and service information and labeling	N/A
GRI 102	General Disclosures	102-43	Approach to stakeholder engagement	232
GRI 102	General Disclosures	102-44	Key topics and concerns raised	24 – 28, 69 – 76
GRI 417	Marketing and Labeling	417-3	Incidents of non-compliance concerning marketing communications	71, 243
GRI 418	Customer Privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	79
GRI 419	Socioeconomic Compliance	419-1	Incidents of non-compliance concerning marketing communications	N/A

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