

# Human Rights Due Diligence Thai Credit Bank 2024

การตรวจสอบสิทธิมนุษยชนอย่างรอบด้าน



# กระบวนการตรวจสอบสถานะสิทธิมนุษยชนอย่างรอบด้าน (Human Rights Due Diligence process)

A

Policy Committing  
& embedding

1. การกำหนด  
นโยบายและระบบ  
บริหาร จัดการ  
(EMBED INTO  
POLICIES &  
MANAGEMENT  
SYSTEM)

B

Human Rights  
Risk Assessment

2. การระบุและ  
ประเมินผลกระทบ  
ต่อสิทธิมนุษยชน  
(IDENTIFY &  
ASSESS  
ADVERSE  
IMPACTS)

C

Integrating and  
Acting

3. การจัดการ  
ความ  
เสี่ยงผลกระทบต่อ  
สิทธิมนุษยชน  
(ยับยั้ง ป้องกัน  
หรือ  
บรรเทาผลกระทบ)  
(CEASE,  
PREVENT, or  
MITIGATE)

D

Monitoring

4. การติดตาม  
(Monitor)

E

Communicating

5. การสื่อสาร  
(COMMUNICATE)

F

Remediation &  
Grievance Mechanisms

6. การจัดให้มีหรือ  
ให้ความร่วมมือใน  
การเยียวยา  
(PROVIDE or  
COOPERATE in  
REMEDATION)



## Policy Commitment & Embedding

### นโยบายและแนวทางการปฏิบัติในเรื่องสิทธิมนุษยชนและความรับผิดชอบต่อสังคม ด้านแรงงาน (Human Rights and Labor Social Responsibility Policy)

ธนาคารยึดมั่นและปฏิบัติตามหลักปฏิญญาสากลว่าด้วยสิทธิมนุษยชน (Universal Declaration of Human Rights) และหลักการชี้แนะของสหประชาชาติว่าด้วยธุรกิจกับสิทธิมนุษยชน (The United Nations Guiding Principles on Business and Human Rights: "UNGPs") รวมถึงแนวปฏิบัติและหลักการด้านสิทธิมนุษยชนในระดับประเทศและระดับสากล โดยหลีกเลี่ยงการละเมิดสิทธิมนุษยชนของพนักงานทุกคนและผู้อื่น ตลอดทุกขั้นตอนในการดำเนิน ธุรกิจของธนาคาร ด้วยความพยายามที่จะบริหารจัดการกับผลกระทบด้านสิทธิมนุษยชนที่ไม่พึงประสงค์ต่าง ๆ ที่อาจจะมีขึ้น ธนาคารได้จัดทำมีนโยบายด้านสิทธิมนุษยชนและคู่มือความรับผิดชอบต่อสังคมด้านแรงงาน เพื่อเป็นการแสดงให้เห็นถึงความมุ่งมั่นและตั้งใจที่จะปฏิบัติเพื่อแสดงความรับผิดชอบต่อสังคมในการเคารพสิทธิมนุษยชน ที่ได้รับการยอมรับในระดับสากล ตามที่ปรากฏในร่างกฎหมายสิทธิมนุษยชนระหว่างประเทศ และหลักการเกี่ยวกับสิทธิขั้นพื้นฐานที่กำหนดไว้ในปฏิญญาว่าด้วยหลักการพื้นฐานและสิทธิในการทำงานขององค์กร แรงงานระหว่างประเทศ

Thai Credit Bank adheres to and complies with the Universal Declaration of Human Rights. Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights The United Nations Guiding Principles on Business and Human Rights ("UNGPs") include national and international human rights practices and principles by avoiding human rights violations of all employees and others. throughout every step of the process. The Bank's business seeks to address any undesirable human rights impacts that may arise. The Bank has established the Human Rights Policy and Labor Social Responsibility Manual as a demonstration of our commitment and determination to act responsibly in respecting human rights. internationally recognized, as reflected in the draft international human rights law and the principles of fundamental rights set out in the Declaration on Fundamental Principles and the Right to Work of International Labor Organizations.



วัตถุประสงค์ของการตรวจสอบสถานะด้านสิทธิมนุษยชนอย่างรอบด้าน หรือการจัดทำ HRDD คือ เพื่อให้ธนาคาร ได้ทราบถึงสถานะของการดำเนินงานขององค์กรตนเองและตลอดห่วงโซ่มูลค่าอันจะทำให้ธนาคารสามารถระบุ ป้องกัน บรรเทา และจัดการกับผลกระทบต่อสิทธิมนุษยชนที่เกิดขึ้นหรืออาจเกิดขึ้นในการดำเนินงานของธนาคารได้ โดยหลักการชี้แนะแห่งสหประชาชาติว่าด้วยธุรกิจกับ

สิทธิมนุษยชน (United Nations Guiding Principles on Business and Human Rights – UNGPs) ได้ระบุขอบเขตและหลักการสำคัญ ดังนี้

- (1) การจัดทำ HRDD ควรครอบคลุมถึงผลกระทบทางลบต่อสิทธิมนุษยชน ทั้งที่ธนาคารเป็นผู้ก่อให้เกิด (cause) หรือมีส่วนทำให้เกิดขึ้น (contribute to) จากกิจกรรมของธนาคารเอง หรือที่กระทำโดยพันธมิตรทางธุรกิจที่มีความเชื่อมโยงโดยตรง (directly linked) กับการดำเนินการ ผลิตภัณฑ์หรือบริการของธนาคาร
- (2) การจัดทำ HRDD ของธนาคาร ไม่จำเป็นต้องมีลักษณะแบบเดียวกันกับธนาคารหรือธุรกิจอื่นๆ ย่อมมีความต่างกันตามความซับซ้อนของขนาดขององค์กร ความเสี่ยงของระดับความรุนแรงของผลกระทบต่อสิทธิมนุษยชน และสภาพกับบริบทการดำเนินธุรกิจของแต่ละองค์กร
- (3) การจัดทำ HRDD ควรมีการดำเนินการอย่างต่อเนื่อง เนื่องจากความเสี่ยงต่อการละเมิดสิทธิมนุษยชนอาจเปลี่ยนไปตามสถานการณ์และบริบทในการดำเนินการของธนาคาร

The objective of the HRDD is to inform the Bank of the status of its own organization and the entire value chain so that the Bank can identify, prevent, mitigate and manage human rights impacts that occur or may occur in the Bank's operations. The United Nations Guiding Principles on Business with The United Nations Guiding Principles on Business and Human Rights (UNGPs) outlines key areas and principles as follows;

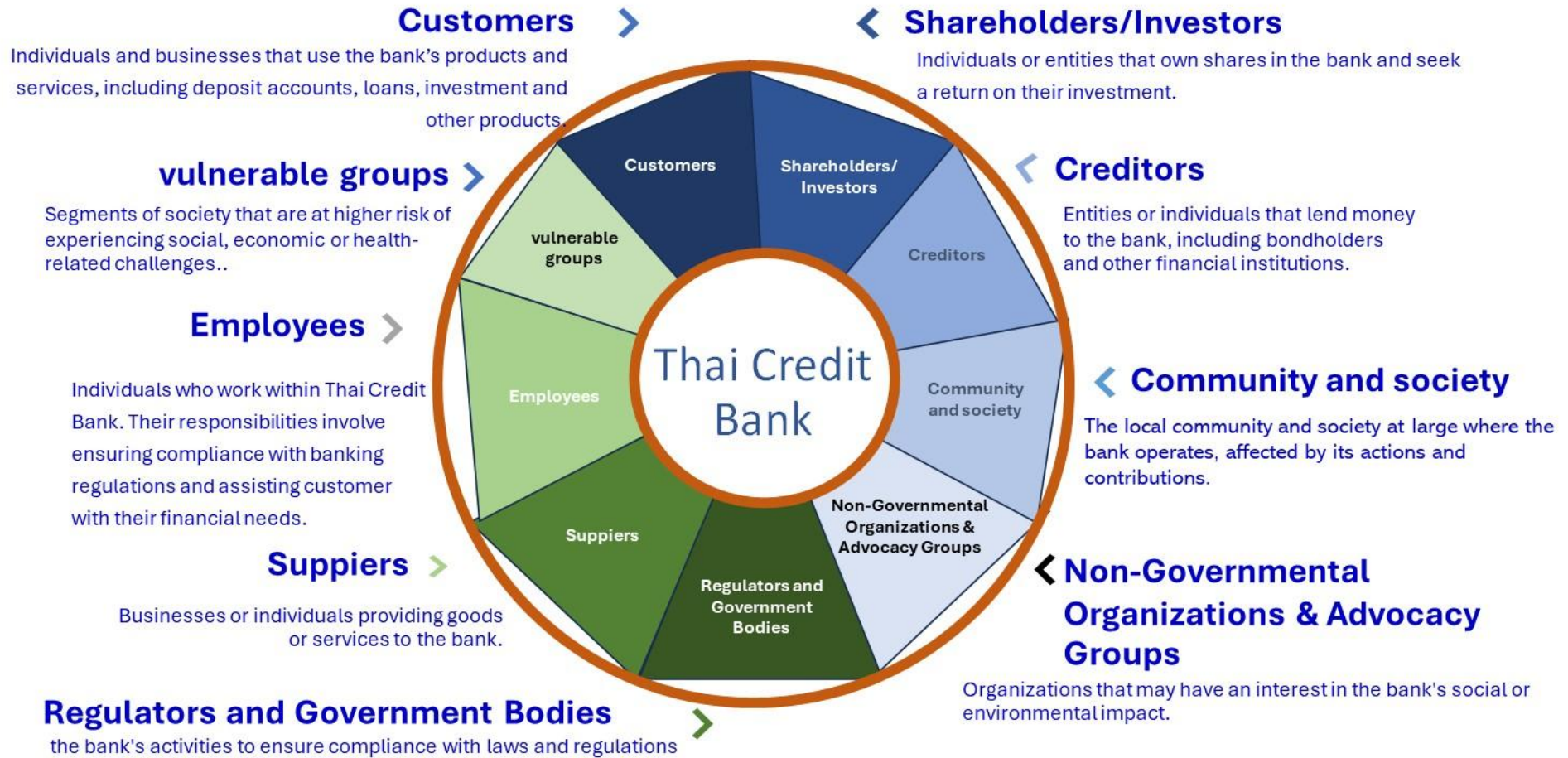
- (1) The HRDD should cover the negative impact on human rights. Whether the Bank is the cause or contribute to the Bank's own activities or by business partners who are directly linked to the operation. Bank's products or services.
- (2) Preparation of the Bank's HRDD It does not have to be the same as other businesses or businesses, they differ in complexity according to the size of the organization. Risk of severity of human rights impacts and conditions with the business context of each organization.
- (3) HRDD should be implemented continuously as the risk of human rights violations may change according to the Bank's situation and operational context.



# Human Rights Risk Assessment



## Stakeholder analysis



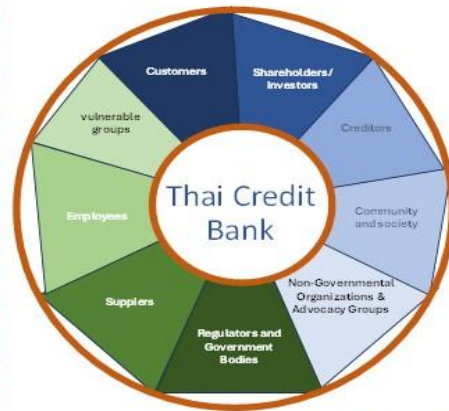
Stakeholders of Thai Credit Bank encompass various groups or individuals who have an interest or stake in the bank's operations, success, and outcomes.





# Human Rights Risk Assessment

## The value chain



Thai Credit Is Passionate About Growing Our Customer's Business And Improving Customer's Life By Providing Unique And Innovative Micro Financial Services



Help building knowledge and discipline in "Financial Literacy" to all our customers

### Community and society

- TTKH (Tang-To-Know-How)
- Financial literacy
- Thai Credit Foundation

Create a passionate organization that is proud of what we do

### Employees

- Everyone matters
- Happy workplace.
- Human rights
- OHS
- Work rules & regulations



- Supplier
- Vendor
- Contractor
- Outsource
- Service provider
- Business partner

Know your supplier

- RPT
- Human right
- ESG issues
- Fair and transparent selection

- KYC
- Product
- Service
- Requirement
- Application
- Information
- Knowledge

#### Our process

- Culture of help.
- Training / learning
- DNA Never mislead.
- KPI management
- Control & review.
- Welcome call
- Pricing & Fee management

#### Our products & services

- Culture of help.
- Training / learning
- DNA Never mislead.
- KPI management
- Control & review.
- Welcome call
- Pricing & Fee management

#### Our products

- MSME
- MFIN
- RWBG

#### Our product & service

- Ensure customer have ability to pay (Affordability).
- Complaint analysis
- Help when customers have difficulty (or when business fail).
- ✓ Debt resolution.
- ✓ TDR & DR
- ✓ Litigation & Debt selling.



### Environment

- Understand of ESG & ESMS
  - Policies/ Performance standards/ Safeguard policy
  - Exclusion list
  - ESDD (Environment & social deal diligent)
  - Internal ESG implementation
    - ✓ Awareness
    - ✓ Projects



### Governance

- **Regulators and Government Bodies**
- **Non-Governmental Organizations (NGOs) and Advocacy Groups**

- Regulatory Agencies
- 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup> Lines of defenses
- National & International std.
- Comply to regulations.
- PDPA/ Data governance.

- Risk management
- RL/ Market conduct
- Culture/ DNA (Never mislead)
- CG&SD committee



# Human Rights Risk Assessment



## Customers >

### Potential Human Rights Risk

- Data Privacy
- Market conduct & Responsible lending
- Discrimination and Harassment

## vulnerable groups >

vulnerable groups - Including: women, children, indigenous people, religious groups, migrant workers, third-party employees, local communities, elderly, pregnant women, LGBTQI+ etc

- Data Privacy
- Provision of information regardless of cognitive abilities
- Inconvenience of receiving the service.
- Exploitation in various ways.
- Discrimination and Harassment.

## Employees >

- Working Condition
- Health and Safety
- Discrimination and Harassment
- Possession of benefits from the creation
- Freedom of association and Right to collective bargaining
- Illegal forms of labors (including Child labor, Forced labor and Human trafficking)

## Shareholders /Investors >

- Data Privacy
- Illegal forms of labors (including Child labor, Forced labor and Human trafficking)





# Human Rights Risk Assessment



**Non-Governmental Organizations & Advocacy Groups** >

**Regulators and Government Bodies** >

**Suppliers** >

**Creditors** >

**Community and society** >

## Potential Human Rights Risk

- Working condition
- Health and Safety
- Discrimination and Harassment
- Illegal forms of labors (including Child labor, Forced labor and Human trafficking)
- Data Privacy

- Data Privacy
- Illegal forms of labors (including Child labor, Forced labor and Human trafficking)

- Health and Safety
- Discrimination and Harassment.
- Illegal forms of labors (including Child labor, Forced labor and Human trafficking)
- Rights of local communities, Rights of minorities.
- Land Acquisition and Forced Re-settlement.

- Data Privacy
- Market conduct & Responsible lending
- Illegal forms of labors (including Child labor, Forced labor and Human trafficking)





# Human Rights Risk Assessment

## Failure Mode And Effects Analysis

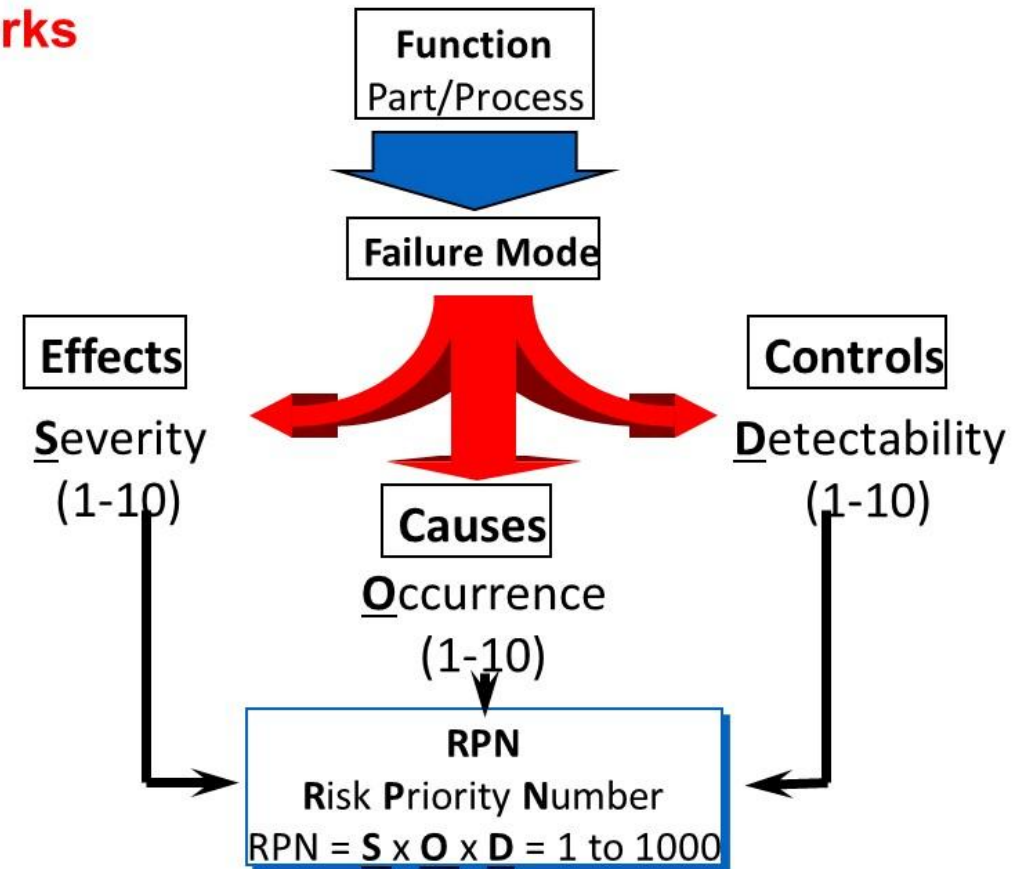
### How it Works

Bank choose FMEA as a tool to assess the risk level of HRDD because FMEA must consider elements such as the type of risk that may occur, severity if such risks arise possibility / most likely of that Risk to be occurred and the ability to detect errors or risks if they occur by the bank. The total score is called “Risk Priority Number” or RPN, which has a maximum score of 1,000

RPN < 100 = Low risk level

RPN >= 100 < 200 = Medium Risk level

RPN >= 200 = High Risk level





# Human Rights Risk Assessment

## Potential Human Rights Risk

Stakeholder groups  Risk level	Customer	vulnerable groups	Employee	Suppliers (Business partners)	Community and society	Non-Governmental Organizations & Advocacy Groups	Shareholders/ Investors	Creditor	Regulators and Government Bodies
<b>High</b> (RPN 200 up)									
<b>Medium</b> (RPN 100 & up)	-Breach in Market conduct & RL			-Working condition  -Health and Safety	-Health and Safety (of Business partner organization).	-Health and Safety (of Business partner organization).			-Breach in Market conduct & RL
<b>Low</b> (RPN below 100)	-Data Privacy -Discrimination and Harassment	-Provision of information regardless of cognitive abilities  -Data Privacy -Inconvenience of receiving the service. -Exploitation in various ways. -Discrimination and Harassment.	-Discrimination and Harassment -Working Condition -Health and Safety -Possession of benefits from the creation -Freedom of association and Right to collective bargaining -Illegal forms of labors (including Child labor, Forced labor and Human trafficking)	-Discrimination and Harassment -Illegal forms of labors (including Child labor, Forced labor and Human trafficking) -Data Privacy	-Discrimination and Harassment. -Illegal forms of labors (including Child labor, Forced labor and Human trafficking) -Rights of local communities, Rights of minorities. -Land Acquisition and Forced Re-settlement.	-Discrimination and Harassment. -Illegal forms of labors (including Child labor, Forced labor and Human trafficking) -Rights of local communities, Rights of minorities. -Land Acquisition and Forced Re-settlement.	-Data Privacy -Illegal forms of labors (including Child labor, Forced labor and Human trafficking)	-Data Privacy -Illegal forms of labors (including Child labor, Forced labor and Human trafficking)	-Data Privacy -Illegal forms of labors (including Child labor, Forced labor and Human trafficking)



# Integrating and Acting



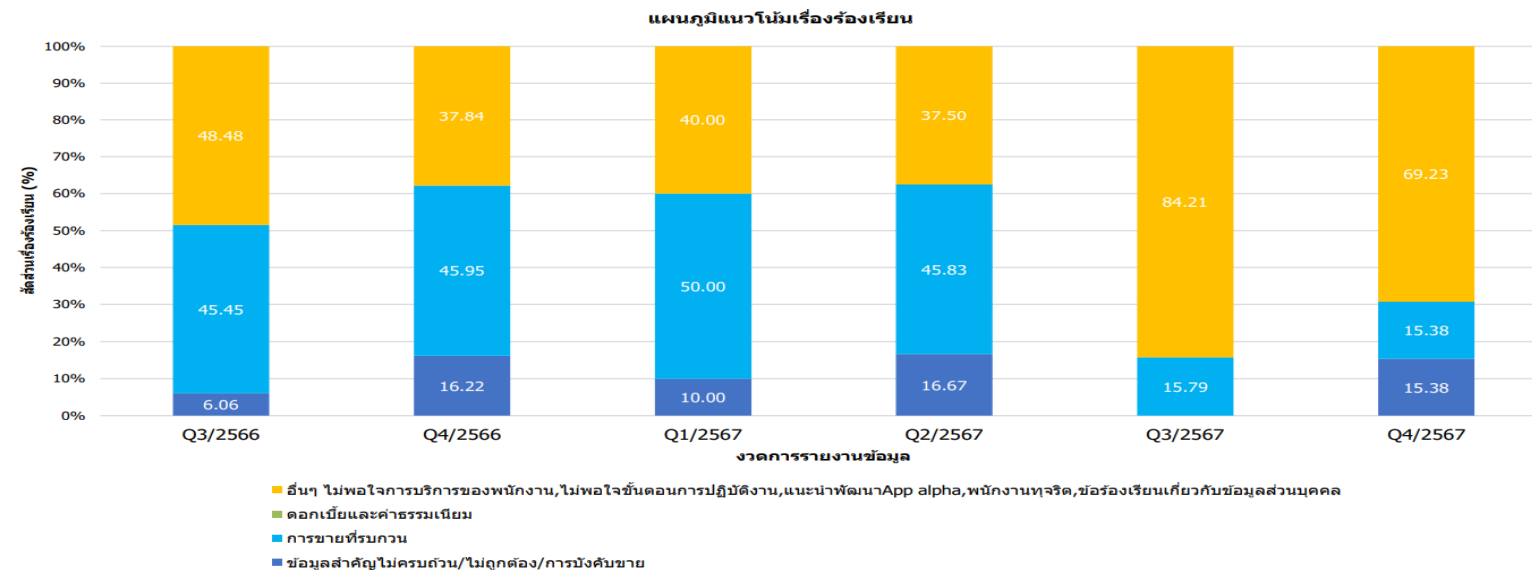
## Prioritization of Human Rights potential risks & Issues

	Customer	vulnerable groups	Employee	Suppliers (Business partners)	Community and society	Non-Governmental Organizations & Advocacy Groups	Shareholders/ Investors	Creditor	Regulators and Government Bodies
<b>Medium</b> (RPN 100 & up)	-Breach in Market conduct & RL			-Working condition -Health and Safety	-Health and Safety (of Business partner organization).	-Health and Safety (of Business partner organization).			-Breach in Market conduct & RL
<b>Improvement Action</b>	-Review and improve Bank's process & product & service concerned to MC & RL through MC committee  -ESMS implementation			-1 <sup>st</sup> step: ESDD Implementation on selected Business partners.	-1 <sup>st</sup> step: ESDD Implementation on selected business partners .	-1 <sup>st</sup> step: ESDD Implementation on selected business partners .			-Review and improve Bank's process & product & service concerned to MC & RL through MC committee
<b>Responsible</b>	-BU heads -MC committee -E&S officers -ESG officer			-BU: purchasers. -Procurement committee -ESG officer	-BU: purchasers. -Procurement committee -ESG officer	-BU: purchasers. -Procurement committee -ESG officer			-BU heads -MC committee
<b>Target date</b>	-On going QTR meeting -On going monitor ESMS.			-Q1 - 2024	-Q1 - 2024	-Q1 - 2024			-On going QTR meeting



# Monitoring

At present, TCB has established reporting procedures regarding to the progress implementation of ESG to its Board of Directors. The Bank has also monitored analyzed, and reported information on problems and resolution of customer complaints and statistical data on system failures that affect the Bank's important services, which are related to market conduct and responsible lending, which is a high priority human rights risk of the Bank, as reported on the Bank's website. In addition, the Bank has followed up on other actions such as PDPA and other matters affecting other stakeholders.



Thai Credit bank's HRDD should be implemented and improved continuously as the risk of human rights violations may change according to the Bank's situation and operational context.





# Monitoring

In the fourth quarter of 2023, the Bank has commenced operations in accordance with the Environment and social Management system (ESMS), which attaches great importance to the Bank's operations so that it does not have negative impacts on the environment and society. The Bank has designated prohibited business sectors that Bank will not support to do the business with since it may cause such negative impacts on Environment and social. As part of its Environmental & Social Due Diligence, Bank requires RM and credit staff to assess customers by using an ESDD Checklist for environmental and social impacts verification of all potential customers before considering loan approval. In addition, the Bank has set up surveillance for cases that may occur from the Bank and its customers that may have a significant negative impact on the environment and society and shall report any such problems and preventive action to senior management as soon as they become aware of the incident. *In 2023, there were no reports of such incidents.*

Thai Credit Bank will continuously develop and improve the process of monitoring negative impacts on the environment and society to ensure effective monitoring and reporting. Comprehensive coverage of all important issues that will lead to the further development of the ESMS system.



# Communicating



The Bank communicates its Commitment Human right Policy and related actions through various communication channels both inside and outside the Bank.

Thai Credit publicly disclose its human rights performance on an annual basis through sustainability report, annual report, or the company's website.

Thai Credit bank communicates on human rights through internal communication channels such as HR speakup, EM magazine, EM watch, Yammer, Employee's activities, and provides training on ESG, ESMS and Human right for all staff. To raise all employee's awareness on the importance of complying with this policy and integrate it into the Bank's business operations.



# PROVIDE *or* COOPERATE *in* REMEDIATION



Thai Credit bank is committed to respecting human rights and conducts timely risk assessments to identify and prevent potential violations. The bank also ensures that it has effective mitigation strategies and remedial actions in place, in case any issues arise. Moreover, the bank monitors and reports its human rights performance regularly and transparently.  
this period.

The Bank has appointed the Managing Director to be the highest responsible for human rights issues.

In case someone wants to make a complaint or report on human rights issues. This can be done by reporting via the complaint channel on the Bank's website or directly to the Chief Executive Officer or Managing Director. The Bank requires the top executives of the Business and ESG officer to report on human rights issues to the MD and brought into the process to find solutions. The complaint shall be notified to the complainant within 30 days from the date of receipt of the complaint, including the remedy for what happened (if any).

Thai Credit Bank also reviews its policy commitments periodically to ensure that they are aligned with the best practices in human rights management. In Y2023 the bank has no reported human rights violations, demonstrates its adherence to its policies and principles. Therefore, ***the bank did not need to implement any remediation measures during this period.***



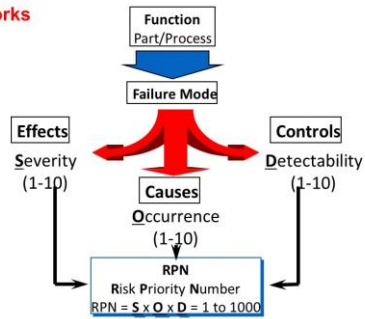


# Stakeholder analysis : Human Rights Risk Assessment



## Failure Mode And Effects Analysis

How it Works



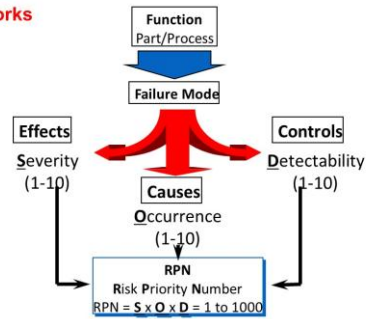
Effectuated group	Potential Failure Mode	Potential Failure Effects	S E V  How severe is the effect on the customer?	Potential Causes	O C C  How often does the Cause or Failure Mode occur?	Current Controls	D E T  How well can you detect the Cause or Failure Mode?	R P N  Calculated
Who is in this step	In what ways can the process step go wrong?	What is the impact of the Failure Mode on the customer?		What are the causes of the Failure Mode?		What are the existing controls and procedures that prevent the Cause or Failure Mode?		
<b>Customers</b>	Data Privacy breach	violation of governmental	10	Improper process & implementation	2	PPP, Training and PDPD & PDPM monitoring teams	2	40
	Breach in Market conduct & Responsible lending	violation of governmental regulations	10	Improper process & implementation	4	PPP, Training and PDPD & PDPM monitoring teams	4	160
	Discrimination and Harassment	Cause extreme customer dissatisfaction	8	Improper process & implementation	3	Training , supervisory and monitoring teams	4	96
<b>vulnerable groups</b>	Data Privacy breach	violation of governmental	10	Improper process & implementation	2	PPP, Training and PDPD & PDPM monitoring teams	2	40
	Provision of information regardless of cognitive abilities	Cause extreme customer dissatisfaction	8	Improper process & implementation	3	Training , supervisory and monitoring teams	4	96
	Inconvenience of receiving the service.	Customer is made uncomfortable and caused customer dissatisfaction	8	Improper process & implementation	2	Training , supervisory and monitoring teams	4	64
	Exploitation in various ways	Customer is made uncomfortable and	8	Improper process & implementation	2	Training , supervisory and monitoring teams	4	64
	Discrimination and Harassment	Cause extreme customer dissatisfaction	8	Inadequate training & communication provided to staffs & lack of implementation control	2	Training , supervisory and monitoring teams	4	64

# Stakeholder analysis : Human Rights Risk Assessment



## Failure Mode And Effects Analysis

How it Works



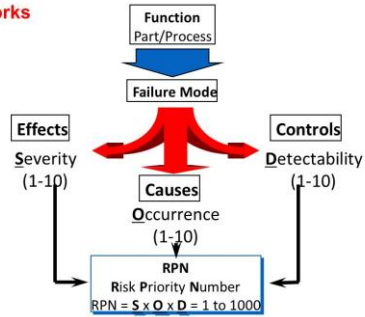
Effectuated group	Potential Failure Mode	Potential Failure Effects	S E V	Potential Causes	O C C	Current Controls	D E T	R P N
Employee	Improper Working Condition	violation of employment regulations and law	10	Improper process & implementation	2	PPP, Training and HR monitoring	3	60
	Health and Safety	violation of employment regulations and law	10	Improper process & implementation & lack of budget	3	PPP, Training , HR & GA monitoring	2	60
	Discrimination and Harassment	Cause extreme employee dissatisfaction	8	Inadequate training & communication provided to staffs & lack of implementation control	3	PPP, Training , supervisory and HR monitoring	4	96
	Freedom of association and Right to collective	violation of employment regulations and law	10	Improper process & implementation	3	PPP, Training and HR monitoring	2	60
	Illegal forms of labors (including Child labor, Forced labor and Human trafficking)	violation of employment regulations and law	10	Improper process & implementation	3	PPP, Training and HR monitoring	2	60
	Human right	violation of employment regulations, code of conduct, human right policy and law	10	Inadequate training & communication provided to staffs & lack of implementation control	2	Training , supervisory and HR monitoring	4	80
	Possession of benefits from the creation	Cause extreme employee dissatisfaction	8	lack of implementation control	3	PPP, intediate & higher manager supervisory and HR monitoring	2	48

# Stakeholder analysis : Human Rights Risk Assessment



## Failure Mode And Effects Analysis

How it Works



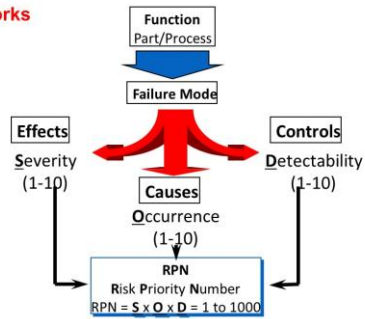
Effectuated group	Potential Failure Mode	Potential Failure Effects	S E V	P o t e n t i a l  C a u s e s	O C C u r r e n c e	C u r r e n t  C o n t r o l s	D E T e c t a b i l i t y	R P N
<b>Suppliers</b>	Working condition (Supplier's employees)	violation of employment regulations and law	10	Improper process & implementation of supplier	4	Business partner policy, TCB's supervisory and monitoring	4	160
	Health and Safety	violation of law and regulation	10	Improper process & implementation of supplier	4	Business partner policy, TCB's supervisory and monitoring	3	120
	Discrimination and Harassment	Cause extreme employee dissatisfaction	8	Improper process & implementation of supplier	3	Business partner policy, TCB's supervisory and monitoring	4	96
	Illegal forms of labors (including Child labor, Forced labor and Human trafficking)	violation of employment regulations and law	10	Improper process & implementation of supplier	3	Business partner policy, TCB's supervisory and monitoring	2	60
	Data Privacy breach	violation of governmental regulations	10	Improper process & implementation	2	PPP, Training and PDPD & PDPM monitoring teams	2	40
<b>Community and society</b>	Health and Safety (by Thai credit bank)	endangered due to the adverse effect on their Health and Safety without warning before failure or violation of governmental regulations caused by TCR's product and services	10	Improper products/ service & process designs & implementation	2	PPP, Training and monitoring by various teams	2	40
<b>Non-Governmental Organizations &amp; Advocacy Groups</b>	Health and Safety (by business partners)	endangered due to the adverse effect on their Health and Safety without warning before failure or violation of governmental regulations caused by TCR's product and services	10	Improper process & implementation	4	Business partner policy, TCB's supervisory and monitoring	3	120
	Rights of local communities, Rights of minorities.	violation of law & regulations, code of conduct, human right policy and ESMS.	9	Improper process & implementation	2	PPP, ESMS implementation, Training and monitoring by various teams	2	36
	Land Acquisition and Forced Re-settlement.	violation of law & regulations, code of	9	Improper process & implementation	2	PPP, ESMS implementation, Training	2	36
	Human right	violation of employment regulations, code of conduct, human right policy and law	10	Inadequate training & communication provided to staffs & lack of implementation control	2	Training , supervisory and HR monitoring	3	60
	Illegal forms of labors (including Child labor, Forced labor and Human trafficking)	violation of employment regulations and law	10	Improper process & implementation	3	PPP, Training and HR monitoring	2	60

# Stakeholder analysis : Human Rights Risk Assessment



## Failure Mode And Effects Analysis

How it Works



Effectuated group	Potential Failure Mode	Potential Failure Effects	S E V	Potential Causes	O C C	Current Controls	D E T	R P N
Shareholders/Investors	Data Privacy	violation of governmental	10	Improper process & implementation	2	PPP, Training and PDPU & PDPM monitoring teams	2	40
	Illegal forms of labors (including Child labor, Forced labor and Human trafficking)	violation of employment regulations and law	10	Improper process & implementation	2	PPP, Training and HR monitoring	2	40
Creditors	Data Privacy	violation of governmental	10	Improper process & implementation	2	PPP, Training and PDPU & PDPM monitoring teams	2	40
	Illegal forms of labors (including Child labor, Forced labor and Human trafficking)	violation of employment regulations and law	10	Improper process & implementation	2	PPP, Training and HR monitoring	2	40
Regulators and Government Bodies	Data Privacy	violation of governmental regulations	10	Improper process & implementation	2	PPP, Training and PDPU & PDPM monitoring teams	2	40
	Illegal forms of labors (including Child labor, Forced labor and Human trafficking)	violation of employment regulations and law	10	Improper process & implementation	3	PPP, Training and HR monitoring	2	60
	Breach in Market conduct & Responsible lending	violation of governmental regulations	10	Improper process & implementation	4	PPP, Training and PDPU & PDPM monitoring teams	4	160