



SIAMRAJATHANEE
PUBLIC COMPANY LIMITED

Whistleblowing and Proceedings Policy

Approved by the Board of Directors No. 4/2021

On August 11, 2021



Edit Note

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Whistleblowing and Proceedings Policy

Siamrajathanee Public Company Limited (the “Company”) provides a channel where all groups of stakeholders can communicate with the Board of Directors of the Company for whistleblowing on the basis of good understanding and cooperation between the Company and its stakeholders. It is considered an important part and is very beneficial to sustainable development. The Company provides processes and channels for receiving and dealing with complaints of stakeholders and protecting the rights of whistleblowers and related persons in order to be fair and not be harassed.

1. Purpose

- 1.1 In order for the Company's complaints to be processed in an appropriate format efficient, flexible and has international standards comparable to other leading companies This will lead the company to grow stably and sustainably.
- 1.2 To enable directors, employees and any person acting on behalf of the Company to conduct business properly, transparently, fairly and can be audited in accordance with the law and good corporate governance principle and business ethics, including the Company's rules.
- 1.3 In order for everyone to honestly notify the Company of any conflict of interest or suspected contravention to the Company through the various notification channels provided.
- 1.4 To enable the whistleblower and any person who has cooperated with the Company in good faith to be properly and fairly protected and prevented from harassment arising out of complaints.

2. Definition

“Company” means Siamrajathanee Public Company Limited.

“Subsidiary” means Siamrajathanee Public Company Limited directly and/or indirectly holding more than fifty percent.





“Group of Companies” means Siamrajathanee Public Company Limited and subsidiaries of Siamrajathanee Public Company Limited.

“Board of Directors” means the Board of Directors of Siamrajathanee Public Company Limited.

“Director” means a director of Siamrajathanee Public Company Limited.

“Employee” means an executive, employee, contract employee, consultant, associate worker and employee of the Group of Companies.

“Supervisor” means an employee in management level or an employee in the managerial level whom the employee trusts to report complaints under this rule.

“Rules” means regulations, rules, regulations or rules that may be called otherwise and are applicable to the operations (Compulsory) of the Group of Companies.

“Misconduct” means an act that violates or fails to comply with the laws or regulations of the Group of Companies, including good corporate governance principle and the Company's business ethics, which consists of two principles: corruption and acts that violate or fail to comply with the laws or rules of the Group Companies.

2.1 **Corruption** means any act that creates unlawful benefits for yourself or others, including the following actions:

2.1.1 Asset embezzlement means possession of property belonging to another person or which is also owned by another person or take property owned by another person for yourself or third person.

2.1.2 Corruption means requesting, accepting or agreeing to give or request or accepting to give assets or any other benefits to government officials, government agencies, officials of private agencies or private agencies in order to those persons or entities using their existing authorities to act, not to act, or delay in any act that is unlawful for the benefit of the Group Companies unless it is permitted by law or custom.





2.1.3 Fraud or embellishment of financial statements means to deceive other persons by misrepresenting or concealing facts which shall be disclosed and such deception resulting in the acquisition of property from the deceived person or a third party or cause the deceived person or a third party to withdraw or destroy any rights.

2.2 Any acts that violates or fails to comply with any laws or rules of the Group Companies other than the misconduct pursuant to Clause 2.1. **“Complaint”** as set out in this rule shall mean a complaint of misconduct as set out in this rule.

3. Scope of complaint

Any directors, employees or persons acting on behalf of the Group Companies may subject to a complaint under this rule if there is misconduct in accordance with Clause 2.1 and Clause 2.2 hereunder.

The Company encourages the whistleblower to disclose his or her identity and/or to provide clear evidence and sufficient for misconduct according to Clause 2.1 or Clause 2.2 hereunder.

In the event that the whistleblower does not disclose his or her identity, when receiving a complaint, the complaint coordinator will consider the information accompanying the complaint whether there is sufficient information detailing facts or evidence. The complaints will not be accepted in the following cases:

3.1 Matters that do not specify evidence or circumstance of fraud or misconduct that are clear enough to conduct an investigation of facts.

3.2 Matters that the Human Resources Group in accordance with the human resources management rule regarding the Company's disciplinary, penalties and grievances, or matters that the Internal Audit Department or other departments of the Group Companies have been considered or determined that it has been completely made with fairness and there is no new evidence which is of any significance.





4. Persons who can report complaints

Any person who knows of complaints or suspects in good faith, whether they have suffered damage or not, whether a director, employee or any person acting on behalf of the Group Companies has misconducted according to Clause 2.1 or Clause 2.2 hereunder, can report a complaint. The Group Companies encourage the whistleblower to disclose his or her identity and/ or provide sufficient evidence regarding the misconduct of the the accused person in accordance with Clause 2.1 or Clause 2.2 hereunder, and it shall provide contact information for communication with the Group Companies.

In the event that there is clear or sufficient evidence that the complainant has a clear circumstance that the whistleblower reports or accuses the accused person in bad faith, the Company needs to take action to protect the reputation of the accused person as follows:

- 4.1 In the event that the whistleblower is an employee, an investigation shall be conducted to consider the punishment according to the Company's rule regarding on human resource management.
- 4.2 In the event that the whistleblower is a third party and the Group Companies is damaged, the Company may consider to take legal action against the whistleblower.

5. Related persons, duties and responsibilities

- 5.1 The report receiver includes directors or supervisors or complaint coordinators. The director or supervisor shall be responsible for sending complaints to the complaint coordinator for further action.
- 5.2 The case coordinator includes the Office of Company Secretary or any persons appointed by the authorized persons according to Clause 5.9 hereunder, whose duty is to collect and consider the sufficiency of the preliminary evidence and submit the verified complaint to the complaint investigator including keeping records of progress and summary of results, monitoring the status of complaints and assigning access rights





to information related to complaints. In addition, there is a duty to monitor the processing of complaints to be completed within the period specified in this rule.

- 5.3 The subject of a report includes directors, employees or any persons acting on behalf of the Group Companies who have been complained or accused of misconduct according to Clause 2.1 or Clause 2.2 hereunder by the whistleblower.

In the event that the complaints investigator finds that there is another person involved in the action whether supporting the action or hiring or giving orders in relation to the complaint, it shall also be deemed that the other person is a subject of a report.

- 5.4 The investigations participant includes directors, employees or third parties who have been asked to cooperate with the case coordinator or complaints investigator of the Group Companies in requesting information related to or possibly related to the complaint.

- 5.5 According to this rule , the complaints investigator of Siamrajathanee Public Company Limited requires that the investigation of complaints related to misconduct according to Clause 2.1 and Clause 2.2 hereunder shall be carried out by the following departments:

5.5.1 For complaints relating to misconduct in cases of corruption under Clause 2.1 hereunder, the Head of the Audit Department of Siamrajathanee Public Company Limited is the person investigating the complaint.

5.5.2 For complaints relating to misconduct in the event of breaching or failing to comply with the laws or regulations in relation to the Group Companies under Clause 2.2 hereunder, the Head of Human Resources Department of Siamrajathanee Public Company Limited is the person investigating the complaint.

5.5.3 In case of complaints under Clause 2.1 or Clause 2.2 herunder are complex matters involving multiple departments, the Chief Executive Officer and Chairman of the Executive Committee shall appoint the fact finding committee director to investigate the complaint as set out in Clause 8.1.2





hereunder. In addition, the complaints investigato shall not have any conflict of interest with the complaint.

5.6 In the event that the Head of the Audit Department of Siamrajathanee Public Company Limited is accused, the Audit Committee shall to appoint the Investigation Committee to investigate the complaint as it deems appropriate.

5.7 In the case of employees at the management level such as Division Head, Function Group, Chief Executive Officer and Chairman of the Executive Committee or director of Siamrajathanee Public Company Limited is accused, the Board of Directors shall appoint the Investigation Committee to investigate the complaint as it deems appropriate.

5.8 The person who has the authority to conclude the result of complaints and to issue the order of punishment on behalf of Siamrajathanee Public Company Limited shall be in accordance with the authorization manual.

In the case of the conclusion of the complaint and the order of punishment, the Head of Audit Committee shall propose it to the Audit Committee of Siamrajathanee Public Company Limited for approval.

In the case of the conclusion of complaints and the order of punishment of employees at management level, Division Head, Function Group, it shall be proposed to the Board of Directors for approval.

5.9 For the appointment of the complaints coordinator and complaints investigator of subsidiaies, the Chief Executive Officer who is the top executive to supervise and monitor the management of subsidiaries, including those authorized by the Chief Executive Officer or Acting Chief Executive Officer shall have the power to consider and approve such appointment. The complaints coordinator and the complaints investigator shall not have any conflict of interest with the complaint.

5.10 The person who can conclude the result of complaint and issue the order of punishment of the subsidiary, shall be a person in accordance with the authorization manual.





6. Protection of whistleblowers and related persons

The whistleblower pursuant to Clause 4 and the related persons pursuant to Clause 5 shall receive the appropriate protection from the Group Companies such as no change of position, nature of work, workplace, work suspension, intimidation, interference with performance, termination of employment or any other actions that are considered as an unfair treatment. In addition, the information regarding the complaint shall be kept as confidential and shall not be disclosed to unrelated parties unless disclosure is required by laws.

Any person who is aware of a complaint or information relating to such complaint pursuant to this rule shall safeguard and keep such complaint and related information as confidential and shall not disclose it to any other persons by considering the safety and damage of the whistleblower, the source of the information or the person involved unless it is necessary in the proceedings under this rule or as required by laws. If there is an intentional breach of disclosing information, the Group Companies will take disciplinary action and/or take legal action against those who violate it, as the case may be.

7. Complaint channels

A complainant can report any complaints through the following channels:

7.1 Letter sent to director or supervisor or the Office of Company Secretary:

Siamrajathanee Public Company Limited

329, Moo 10, Old Railway Road, Samrong Sub-district,

Phrapradaeng District, Samut Prakarn Province 10130

7.2 Facsimile to supervisor or the Office of Company Secretary at 0-2363-9377.

7.3 Electronic mail to supervisor or the Office of Company Secretary at cs@siamraj.com

7.4 Website: www.siamrajathanee.com

7.5 Suggestion box:

- Box no. 1 is located at 1st floor.

- Box no. 2 is located ar 2nd floor.





- Box no. 3 is located at 3rd floor.

- Box no. 4 is located at 4th floor.

8. Procedure of Siamrajathanee Public Company Limited

8.1 Investigation of complaint

8.1.1 In the case of uncomplicated matters such as complaints with clear evidence and/or not related to many departments, the complaints coordinator shall circulate the complaint to the complaints investigator in accordance with Clause 5.5 hereunder for the following proceedings:

(1) In case of complaint of misconduct under Clause 2.1 hereunder, the Internal Audit Department of Siamrajathanee Public Company Limited shall investigate the facts in consultation with the Head of Human Resources Department or the person acting on behalf of such position.

(2) In case of complaints of misconduct under Clause 2.2 hereunder, the Human Resources Department of Siamrajathanee Public Company Limited shall investigate the facts of the complaint.

8.1.2 In the case of complex matters such as complaints with a large amount of clear evidence or difficult or involving many departments, the Internal Audit Department of Siamrajathanee Public Company Limited or the Human Resources Group of Siamrajathanee Public Company Limited, as the case may be, shall propose such complaint to the Chief Executive Officer and the Chairman of the Executive Committee of Siamrajathanee Public Company Limited to consider and appoint the Investigation Committee which shall consist of at least 1 assigned person of the relevant departments consisting of the Internal Audit Department, the Legal Department and the Human Resources Department of the Company.

The Chief Executive Officer and the Chairman of the Executive Committee of Siamrajathanee Public Company Limited may appoint an employee or other person to serve as a member of the Investigation Committee and all members





of the Investigation Committee shall not have any conflict of interest in that matter.

8.1.3 For the investigation of complaints accused to the Head of the Internal Audit Department of Siamrajathanee Public Company Limited, the executive at the Division Head level, the executive at the level of Function Group, the Chief Executive Officer, the Chairman of the Executive Committee or the Board of Directors, it shall be investigation of complaints in accordance with Clause 5.6 and Clause 5.7 hereunder.

8.2 Processing time

8.2.1 The report receiver shall submit the complaint to the complaints coordinator within 3 business days from the date of the receipt of the complaint from the whistleblower.

8.2.2 The complaints coordinator shall submit the complaint to the complaints investigator within 7 business days from the date of the receipt of the complaint from the report receiver or from the whistleblower as the case may be.

8.2.3 The complaints investigator pursuant to Clause 5.5.1 or Clause 5.5.2 shall consider and report a conclusion of settled complaints and the result of the order of punishment of the authorized person under Clause 5.8 (if any) to the complaints coordinator within 30 business days from the date of the receipt of the complaint from the complaints coordinator. If the Internal Audit Department of Siamrajathanee Public Company Limited is the person who proposes the punishment order, it shall be approved by the Human Resources Department regarding the standard of punishment.

8.2.4 The Investigation Committee pursuant to Clause 5.5.3, Clause 5.6 and Clause 5.7 hereunder shall consider the report of the conclusion of the complaint which has been settled and the the result of the order of punishment of the authorized person under Clause 5.8 (if any) to the complaints coordinator within 60 business days from the date on which the Investigation Committee has been appointed.





8.2.5 In case of necessity that cannot be completed within the period as set out in Clause 8.2.2, the complaints coordinator shall propose to the Chief Executive Officer of Siamrajathanee Public Company Limited for consideration and approval of the extension of not more than 7 business days at a time.

8.2.6 In case of necessity that cannot be completed within the period as set out in Clause 8.2.3 or Clause 8.2.4, the complaints investigator shall propose the complaint to the Chief Executive Officer of Siamrajathanee Public Company Limited or the Audit Committee or the Board of Directors (as the case may be) for acknowledgement of reasons that cannot be performed within the said specified period.

8.3 Reporting

8.3.1 The complaints coordinator has its duty to report the conclusion of complaint to the whistleblower, the report receiver, the accused person, the person who cooperates in the investigation of the complaint or other persons as it deems necessary and appropriate.

8.3.2 The Audit Department of Siamrajathanee Public Company Limited, the Human Resources Department or the Investigation Committee according to Clause 5.3.3 (as the case may be) shall have its duty to report the conclusion of complaint and the order of punishment of the authorized person according to Clause 5.8 (if any) to the Chief Executive Officer and the Audit Committee of Siamrajathanee Public Company Limited (in case of the complaint of misconduct and corruption according to Clause 2.1) or the Corporate Governance Committee (if any) of Siamrajathanee Public Company Limited (in case of complaint of misconduct according to Clause 2.2).

8.3.3 The Investigation Committee pursuant to Clause 5.6 and Clause 5.7 (as the case may be) shall report the conclusion of complaint and the order of punishment of the authorized persons under Clause 5.8 (if any) to the Board of Directors.





8.3.4 In the event that the complaints coordinator and/or the complaints investigator examines the preliminary evidence and finds that the complaint may have a significant impact on the reputation, business operations and/or financial position of the Company, the complaints coordinator who found or notified by the complaints investigator shall report such complaint to the Chief Executive Officer of Siamrajathanee Public Company Limited immediately for further consideration.

9. Procedure of Company

9.1 The person who has been appointed as the complaints coordinator and the complaints investigator by the Chief Executive Officer of Siamrajathanee Public Company Limited under Clause 5.9 shall investigate the complaint. However, if the complaints coordinator and/or complaints investigators is accused, the complaints coordinator of Siamrajathanee Public Company Limited shall consult with the Chief Executive Officer for further consideration as it deems appropriate.

9.2 Processing time

The Chief Executive Officer of Siamrajathanee Public Company Limited in accordance with Clause 5.9 shall enforce the specified period for processing of complaints of the subsidiary under Clause 8.2 hereunder.

9.3 Reporting

9.3.1 The subsidiary's complaints coordinator has its duty to report the conclusion of complaint to the whistleblower, the report receiver, the accused person, the person who cooperates in the complaint investigation, the complaints coordinator of Siamrajathanee Public Company Limited or other persons as it deems necessary and appropriate.

9.3.2 The subsidiary's complaints coordinator has its duty to report the conclusion of complaint and the order of punishment of the authorized person under Clause 5.10 (if any) to the complaints coordinator of Siamrajathanee Public Company Limited for acknowledgment and suggestion(if any) and to the Chief





Executive Officer of Siamrajathanee Public Company Limited under Clause 5.9, which has a duty to report the conclusion of complaint and the order of punishment the authorized persons under Clause 5.10 (if any) to the Chief Executive Officer and to the Audit Committee in case of the complaints regarding misconduct and corruption according to Clause 2.1 or to the Corporate Governance Committee (if any) in case of misconduct complaints according to Clause 2.2.

9.4 In the case of the person appointed as the complaints coordinator and/or the complaints investigator by the Chief Executive Officer of Siamrajathanee Public Company Limited under Clause 5.9, has considered the preliminary evidence and found that the complaint may have a significant impact on the reputation, business operations and/or financial positions of the Group Companies, the complaints coordinator who found or notified by the complaints investigator shall report such complaint to the Chief Executive Officer of Siamrajathanee Public Company Limited according to Clause 5.9 or the person acting in such position immediately for consideration and it shall report such complaint to the complaints coordinator of Siamrajathanee Public Company Limited for further acknowledgment.

10. Enforcement

This rule shall apply to the Company and its subsidiaries and Group Companies (except in cases where this rule is contrary to or inconsistent with the laws, the provisions of laws shall prevail).

11. Penalty

Any person who commits any act whether willfully or negligently, fails to comply with this rule, including harassing behavior, threatening, taking disciplinary actions or discriminating in an unlawful manner due to the complaint of the whistleblower or the person involved in the complaint, such person shall be deemed to have committed a breach of discipline and shall be liable to compensate the Company or those affected by such acts as well as civil and criminal liability under the laws.





12. Compliance

Unless expressly stated otherwise in writing, in the event of doubt, it shall be construed in accordance with the spirit of the rule.

In order the operation of the Company in the same direction, the whistleblowing and proceedings policy has been announced. This policy shall be effective on 11 August 2021.

Siamrajathanee Public Company Limited

Signed.....

(Mr. Weidt Nuchjalearn)

Chairman of the Board of Directors

