

## Whistleblowing Policy

### **Definitions**

<b>Fraud</b>	means an intentional act committed to secure unfair or unlawful gains for oneself or others. Fraud can be broken down into three types: corruption, asset misappropriation and fraudulent reporting, for example, fraudulent financial statements.
<b>Corruption</b>	means the misuse of position or power of influence for inappropriate gains for the organization, oneself or others. Corruption includes any types of bribery; an offering, giving, promising or agreeing to give, demanding or accepting money, assets, or other inappropriate benefits from the government officers, government sectors, private sectors, or responsible person either in direct or indirect action so that such person could proceed or disregard his/her function in order to acquire, retain the business, recommend specific company to the entity, or achieve any improper benefits in business transaction. Exception shall be applied in case of laws, regulation, statement, standard, custom, or business traditions enable to do so.

Board of Directors had approved the Whistleblowing Policy as a mechanism for the Company's employees and third parties to report any misconduct, or file for grievances without being discriminated or mistreated should they be aware of any wrongdoing, or fall victim to fraud and corruption, or violation of laws / Company regulations.

### **Whistleblowing Channel**

- Telephone: 66 2 285 0040 ext. 2701
- Facsimile: 66 2 285 0255
- Postal mail: Head of Internal Audit Unit  
Thai Wah Public Company Limited  
21/11, 21/13 Thai Wah Tower 1, 6th Floor  
South Sathorn Road, Tungmahamek, Sathorn  
Bangkok 10120, Thailand
- Email: The Chairman of the Board - [bod@thaiwah.com](mailto:bod@thaiwah.com)  
The Chairman of Audit, Risk and Corporate Governance Committee - [arc@thaiwah.com](mailto:arc@thaiwah.com)  
Head of the Internal Audit Unit - [ia@thaiwah.com](mailto:ia@thaiwah.com)
- Website: [www.thaiwah.com](http://www.thaiwah.com)

## **Whistle-Blowing Reporting Procedures**

1. The whistle-blower can complain via whistleblowing channels verbally or in writing.
2. If the whistle-blower wishes not to disclose his/her name, there must be sufficient factual details or clear evidence to provide grounds for believing that a violation of laws, rules and regulations or the Company's Code of Conduct had occurred in the Company's business.
3. The complaint shall be deemed confidential. However, if he/she does disclose his/her identity, this would allow the Company to report him/her the outcome of the investigation or additional particulars concerning the matter of complaint.

## **Investigating the Facts Procedure**

1. Upon receiving the whistleblowing, the Internal Audit (IA) team as assigned by the Audit, Risk and Corporate Governance Committee (ARCG) will gather all the reported cases and ensure that the issues raised are professionally and independently addressed.
2. IA team will then investigate, access and propose the appropriate procedures for managing the whistleblowing to the ARCG.
3. The ARCG will consider the results and enforced the disciplinary actions based on the Company's rules and regulations and/or file the police report.
4. The ARCG Chairman will then report the conclusions of the investigation to the Board of Directors.

## **Mechanism to Protect Whistle-Blowers**

1. All concerns and irregularities will be treated confidentially and access to the information will be limited only to responsible persons. Any information of the whistle-blower will not be disclosed.
2. The collaborator and the officers involved in the investigation will be protected as well as the whistle-blowers.
3. If the whistle-blower made an allegation in bad faith or for personal gain, appropriate action will be taken against him/her which might be disciplinary action and/or legal prosecution.
4. If a whistle-blower believes that he/she is being subjected to discrimination, retaliation, or harassment for having made a report, he/she should immediately report those facts to the Board of Directors or the Audit, Risk and Corporate Governance Committee or the IA Team through one of the above whistle-blowing channels.
5. Those who receive harm will be compensated in a fair and appropriate manner.