



Whistleblowing or Complaint and protection of whistleblowers or complainants Policy

1. Principles and rationale

As Crown Seal Public Co., Ltd. ("the Company") emphasizes the importance of good corporate governance principles. The Company engaged in business with accuracy, transparency, accountability and fairness to stakeholders both inside and outside the organization for all the time throughout and improving and developing work process to be in line with the good corporate governance principle and comply with international standard.

In order that the Company's business shall be operated according to the above principle, it is appropriate to set channels for whistleblowing or complaint relating with behavior, or action that is considered as violation against the Anti-Corruption Policy, code of conduct of the Company, laws, rules, regulations and provisions of the Company and business ethics, as well as there is determining to have protection for whistleblowing or complaint as follows:

2 Objectives

- 2.1 To ensure that the Company's business and work of employees of all levels are correct, transparent, fair and accountable, complying with good corporate governance principle, Anti-Corruption Policy, code of conduct of the Company, laws, rules, regulations and provisions of the Company and business ethics.
- 2.2 In order for the whistleblower or complaint and related persons who cooperate with the Company honestly, to be protected and maintained properly and fairly from bullying due to whistleblowing or complaint.
- 2.3 To ensure effective whistleblowing and complying with international standard.

3. Scope and guidelines

All group of stakeholders of the Company who find clues of corruption or persons who are affected by denial corruption, wrong-doing against ethics of the Company, laws, rules, regulations and provisions of the Company, as well as business ethics of employees, high-rank executives, or directors, or shareholder can report clues/complaint through channels specified by the Company in this regulation. The Company will protect persons who cooperate in whistleblowing or corruption report, wrong-doing against code of conduct of the Company, laws, rules, regulations and provisions of the Company and business ethics and provide fairness to persons who are accused in that matter.

This regulation is deemed as a part of Anti-Corruption Policy and code of conduct of the Company which every employee is obliged to adhere to.

3.1 Whistleblowing or Complaint

Employees must not neglect, or ignore, when there is finding or knowing that there is operation that is conflict to the Company's regulation or order of the Company, or if employees see the action which is corruption or only suspected to be corruption, wrong-doing against the code of conduct of the Company, laws, rules, or regulations and provisions of the Company and business ethics related to the Company. Employees must notify through the

channels that the Company specifies. If there is doubt or uncertainty in employees' own judgment, employees can consult from supervisors or ask the management or secretary office of the Company.

Employees must cooperate in inspecting and providing facts in the case that employees see actions that are considered corruption, wrong-doing against code of conduct of the Company, laws, rules, regulations and provisions of the Company and business ethics.

3.2 The matters receiving whistleblowing or complaint.

3.2.1 Illegal use of authority and duty to seek benefit to oneself or to other persons.

3.2.2 There is finding of destruction of documentary evidence, distortion, or concealment of information to support corruption, wrong-doing against code of conduct of the Company, laws, rules, regulations and provisions of the Company and business ethics.

3.2.3 There is finding of any action that is suspected to be corruption, wrong-doing against code of conduct of the Company, laws, rules, regulations and provisions of the Company and business ethics, or there is event/information that may be such action.

3.2.4 There is effect from whistleblowing or giving information or cooperating in the searching for fact or refusing to do corruption, such as being bullied, demotion of positions, being punished, being dismissed from work or effect that cause damage to whistleblower.

4. Channel to notify whistleblowing or complaint.

4.1 Request for consultation

Before notifying whistleblowing, if it is unclear whether such action is behavior within the whistleblowing or complaint or not, in order to ask for consultation from supervisor that they trust, or Company Secretary Office Manager, or Internal Audit Manager, or Human Resources Manager etc.

4.2 Whistleblowing or Complaint.

Any person sees the suspected cause of corruption or is affected by refusal of corruption and wrong-doing against code of conduct of the Company, laws, rules, regulations and provisions of the Company and business ethics can notify about such action/complaint by disclosing or not disclosing his/her name and specify the fact, or provide evidence that is clear enough to show that there is reasonable ground to believe that there is corruption, or there is effect from refusal of corruption and wrong-doing against code of conduct of the Company, laws, rules, regulations and provisions of the Company and business ethics, through one of the following channels:

Item	Whistleblowing or Complaint	Channel to notify whistleblowing or Complaint
1.	Directly sent information to the following persons:	1. Supervisor in whom they have trust 2. Secretary to the Board of Directors 3. Human Resources Manager 4. Internal Audit Manager 5. Independent Director or Audit Committee
2.	Send electronic (E-mail)	companysecretary@crownsal.co.th

Item	Whistleblowing or Complaint	Channel to notify whistleblowing or Complaint
3.	Send by post	To the Company Secretary: Crown Seal Public Company limited 5 Soi Rangsit-Nakornnayok 46 Prachatipat, Tanyaburi, Pathumthani 12130
4.	The Company website	https://crownseal.co.th/contact-us
5.	To Complaint Cabinet	In front of the employees dining room, 2 nd floor, Crown Seal Public Company Limited.
6.	In the event of coming across the issue that needs to be reported urgently, it shall be reported directly to the Company Secretary immediately for reporting onto the President and the Board of Directors forthwith.	

5. The investigators or working groups consist of:

- Vice-President level up
- Human Resources Manager
- Internal Audit Manager
- Company Secretary Office Manager

6. Steps of receiving complaints

- 6.1 When receiving complaints, Company Secretary office will send the matter to the investigator, or working group to collect and screen preliminary fact.
- 6.2 Investigator or working group will inspect the information and investigate the complaint independently and fairly, to reach conclusion for confirming, or arguing with the complaint and fact received and to give right to the person who is complained, to know the complaint and prove the persons. There will be consideration to do in next level, such as cancelling the complaint as there is no cause, or complaint basis, or disciplinary punishment and doing according to the law with the person who is complained if such action is deemed as wrong-doing according to the laws.
- 6.3 The investigator, or working group will record the words, or use audio recorder of the complaint maker, or person who is complained and other related persons in writing to read to the testifier for acknowledgement or modifying and adding and persons shall sign name. In case such persons do not sign name, the investigator, or chief of working groups shall read the contents to such persons and the person who is complained shall sign name.
- 6.4 The investigator, or working group will inform about progress of investigation from time to time to the reporter, complaint maker, or cooperators through the given channel and investigation will be done completely without delay.
- 6.5 The investigator or investigation working group shall make report of conclusion, at least there shall be the following contents:
- Day, time, place, cause, nature, type, events which there is doubt that there is wrong-doing, related persons.
 - Number and value of damage (if any).

- There is lodging of complaint to government officers under the law or no lodging of complaint, as appropriate.
 - Event that is suspected that there is committing of offence whether there is coverage of insurance or not.
 - Conclusion of investigation should show what the weakness is occurring in the system of the Company work.
- 6.6 During investigation, the investigator, or working group may propose to the President so that the person who is complained, or related person to work in other duties temporarily.
- 6.7 Investigator or investigation working group specially, does not have authority to order punishment to the person who is complained, but may give recommendation for punishment
- 6.8 The Company will keep personal information of the person who reports, complainant, or persons who cooperate to be confidential information and will not allow threatening, or intimidating. If there is such case, the matter shall be informed to Human Resource Manager or person in higher rank, so that there is specific protection measure according to the situation.
- 6.9 When the Company has investigated and found that there is no committing of offence according to the complaint, the Company will not punish the whistleblower, or complainant (if the person is a director, or employee of the Company, or organization that the Company invests that is done honestly. However, if from the investigation, it is found that the complainant complained with evil intention, or give false statement, the Company will punish the complainant and/or prosecute under the law, as the case may be.

7 Conditions and consideration of the whistleblowing or complaint

- 7.1 Detail of whistleblowing or complaint must be true, clear or enough for searching fact for further action.
- 7.2 The received information will be treated as confidential information and the name of whistleblower or complainant will not be disclosed to public, without consent.
- 7.3 Whistleblower's right or complainant's right will be protected whether he/she is an employee or outsider.
- 7.4 Response operation period to the complainant should not exceed 30 days after receiving complaint.
- 7.5 Period to respond to the complaint depends on the complexity of the matter and adequacy of documentary evidence.
- Uncomplicated matter with clear evidence, not affiliated with many agencies, it may have considering and report summary of settled complaints within 30 working days.
 - Complex matters, having a lot of evidence involved in many department there may be appointment of investigation committee to consider and report a summary of the complaints that have been settled to President within 60 working days. But if it is about of President or Director, ask to report a summary of the complaints that have been settled to the Board of Directors.
 - In case of necessity which cannot be completed within the specified time, to present the matter to the President, in order to extend inspection period.

7.6 The person receiving complaint and relevant persons relating with the investigation process shall keep relevant information as confidential information and will disclose only necessary information, realizing safety and damage to complainant or cooperating in fact checking, or source of information, or related persons.

Conditions and procedures for consideration of clues and complaint are specified in the announcement of information channels to the Company that the Company's personnel in all area and area and outsiders can access. However, the company secretary office and Human Resources Department, that are responsible for notifying incidents or clues, must review and update the process of reporting of incidents or clues, and communicate the information about reporting incidents or clues to the personnel of the Company and third parties.

In case the Company has additional channels of complaint or whistleblowing, Company Secretary Office and Human Resource Department must prepare steps of whistleblowing and methods of work of complaint receiver, as well as there is review and update of such steps always. Furthermore, there is determining to hold training to personnel who do the duty of receiving complaint or whistleblowing regularly, covering steps of work, keeping confidential information, ethical procedures and other relevant policies.

8. Dishonest complaints or wrong-channel

If whistleblowing, complaint, record the words or provide any information that is do not honestly or wrong-channel. If the person is employee of the Company, the Company will punish discipline. If the person is outsider who is causing damage to the Company, the Company will consider prosecuting that person as well.

9. Measures protecting whistleblowers or complaint and refusal of corruption

The Company specifies mechanism to give protection to persons who cooperate with the Company in Anti-corruption, wrong-doing against ethics of the Company, laws, rules, regulations and provisions of the Company, as well as business ethics of employees, that is, whistleblowing, or giving information, as well as refusal of corruption to create confidence, that such action will not make the complaint maker to be in trouble and to suffer from damage, as follows:

9.1 The Company will not disclose name of whistleblower or relevant persons who cooperate with the Company and detail of whistleblowing or fact involved, by limiting accessing information and keeping such information as confidential information of the Company only the person responsible for inspecting the whistleblowing only accessing such information, except disclosing data under the law.

9.2 The Company will protect those who cooperate with the Company in whistleblowing or refusing of corruption related to the Company, in order not to suffer harm or do not receive fairness, arising from cooperation in such anti-corruption.

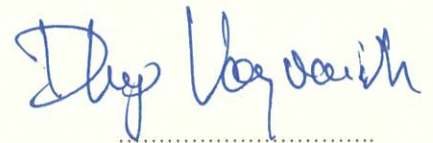
9.3 The Company will not terminate employment, suspension, change of position, change of nature of work, place of work, disciplinary action, or doing any other act which is unfair treatment to the whistleblower, or any related person who does not intend to give false information or has performed duty properly; even if doing so will cause the Company to lose business opportunities .

- 9.4 In the event that whistleblower or complainant finds himself unsafe, or may suffer from damage, the Company can determine the appropriate protection measures.
- 9.5 The Company protects the right of complainant who provides information honestly and keep such information confidential for whistleblower or complainant; the Company will keep such data as confidential by limiting the perception to those who are responsible for investigating the truth. If such information is found misused, or disclosed improperly, it will be considered as violation and breach of discipline.
- 9.6 In case that there are employees or executive treating others in unfair methods, or causing damage to other persons who have motive from the fact that other persons have reported whistleblowing or complaint or refusal of corruption to be considered disciplinary violation.
- 9.7 The Company will mitigate the damage through appropriate and fair methods for such persons that have been damaged from the information notification.

10 Penalty

The person who does anything intentionally or negligently, does not comply with this regulation including behavior that shows bullying, intimidation, disciplinary action, or discriminate, by unlawful methods due to whistleblowing or complaint to whistleblowers or complainants, or persons involved in the using of this regulation shall be deemed to have committed breach of discipline and must be responsible for damage caused to both the Company and those affected by such action.

This shall be effective on November 7, 2022 onwards.



(Mr. Dhep Vongvanich)

Chairman of the Board of Directors

Announced on November 7, 2022