

## Whistleblowing and Complaint-filing Policy

1. The corporate governance principles for listed companies require the Board to
  - 1.1 Put in place channels for whistleblowing or complaint-making about law-breaking, violations of the code of conduct, false financial reports, or a compromised internal control system. The channels include independent directors or the audit committee.
  - 1.2 Put in place a mechanism for the protection of whistleblowers, including not naming names
  - 1.3 Define the process after whistleblowing:
    - Scrutiny of data
    - Reporting to the Board.
2. Bangchak has also set up a protection mechanism for whistleblowers so that stakeholders may contribute to more efficient stewardship for Bangchak's benefit.

Matters for which whistleblowing or complaint-filing applies:

- Unlawful practices, frauds against company regulations, or violation of the code of conduct by directors, executives, and employees
- Irregularities of financial reports or defects in the internal control system
- Matters affecting Bangchak's interests or reputation.

Channels to report or complain

E-mail: [ico@bangchak.co.th](mailto:ico@bangchak.co.th)

Mail: Internal Audit

### Procedure

1. Register complaint: The Internal Audit handles each complaint and categorizes it before forwarding it to the executive vice president to whom the accused report(s)
  2. Verify and compile data: The executive vice president verifies or assigns the superior or head of the unit of the accused to verify the accuracy and adequacy of data and facts
  3. Investigate: The senior executive vice president informs the President&CEO and reviews the investigation approach, including the necessity of setting a special investigation panel. All this must align with Bangchak's regulations.
  4. Inform the complainant/whistleblower about the outcome: Once the investigation is over, the outcome and action taken on the accused are to be submitted to the director of the Internal Audit to brief the complainant/whistleblower. All related data are to be filed as confidential.
  5. Report to the Board: The Internal Audit tables a summary of the complaint and the action taken for the acknowledgment of the Audit Committee.
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### **Procedure**

All actions taken are to be treated as confidential and known only among those assigned and related. The names of the complainants/whistleblowers are strictly never to be disclosed.

### **Whistleblower protection mechanisms**

- Set up a database for confidential information of whistleblowers and, if such information is disclosed, set up punitive measures for responsible people
- This database must be made accessible to executives at the level of Senior Executive Vice President only.
- It falls under the authority of the superiors or supervisors of all those accused to give proper directives to protect whistleblowers, witnesses, and those who handed evidence to the investigation to keep them out of danger, trouble, or unfairness due to their making complaints, serving as witnesses, or giving information.

### **Benefit of whistleblowing**

Bangchak's image and credibility are bound to suffer if employees act unethically or unlawfully, file false financial reports, neglect a compromised internal control system, or harm its interests or reputation. Also, such actions could incur risks to Bangchak's financial burdens.

Staff or stakeholders that participate in the vigilance for these deeds are doing a service for Bangchak, its workforce, and other stakeholders. For Bangchak would then command a good image and credibility and remain a sustainably developing organization.

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