



บริษัท อ-apiโก ไฮเทค จำกัด (มหาชน)

AAPICO HITECH PUBLIC COMPANY LIMITED

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# Whistle Blowing Policy

<b>Last Update:</b>	November 4, 2019
<b>Approval as of:</b>	November 14, 2019

**1) Introduction**

In line with the good corporate governance of the Company, the Board of Directors has provided the opportunities and a channel for employees and stakeholders to report complaints and any misconduct or illegal acts directly to the Board of Directors.

**2) Objective**

The main objective of the whistle blowing policy is to provide employees and stakeholders, including shareholders, customers and suppliers of the AAPICO Group a channel to raise genuine concerns and to promote the highest possible standards of ethical and legal business conduct. The objective of having the policy is also to detect serious malpractice thereby promoting the best practice of corporate governance within the organization.

**3) Scope**

This policy applies to all employees of AAPICO Hitech PLC and subsidiaries.

**4) Responsibilities**

**Employees** and **stakeholders** of the AAPICO Group are encouraged to disclose any information or raise a genuine concern about serious breaches of the code of conduct. Such breaches of code or violation of law include, but not limited to, fraud, corruption, malpractice financial irregularities, dishonesty, criminal activities and personal misconduct.

**The Board** is also responsible for reviewing and investigating the matters. The Audit Committee is assigned to be a contact window. In some cases, the Board may assign directors or management to handle the matter where appropriate.

**5) Type of Misconduct**

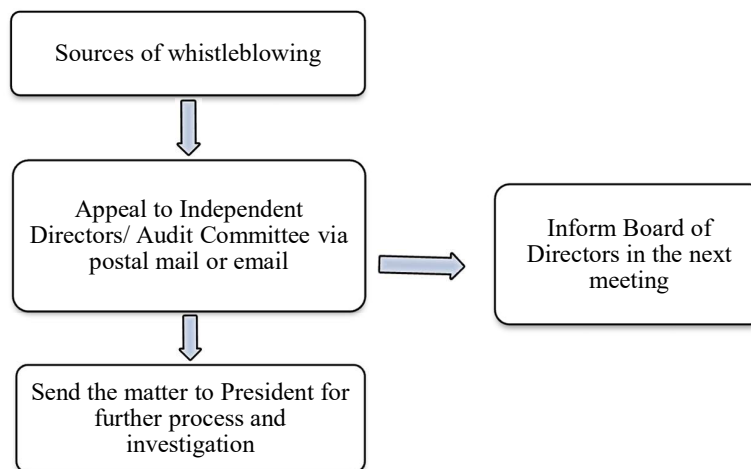
Typical disclosures include, but not limited to, the following:

1. Fraud.
2. Misappropriation of assets.
3. Sexual harassment.
4. Corruption.
5. Questionable or improper accounting.
6. Misuse of confidential information.
7. Acts or omissions, which are deemed to be against the interest of the Company, laws, regulations or public policies.
8. The deliberate concealment of any of the above matter of other acts of wrong doing.

**6) Method and Reporting Channel**

1. The whistleblower may report the suspected or actual event to his/her supervisor or manager.

2. If the whistleblower would be uncomfortable or reluctant to report to his/her supervisor, then the whistleblower can report the matter to the Board of Directors via the following channels.
  - i) Postal mail  
Chairman of Audit Committee  
The Offices at Central World, Room no. 2812, 28<sup>th</sup> Floor,  
999/9 Rama 1 Road, Pathumwan, Bangkok 10330
  - ii) E-mail  
AC@aapico.com
3. The whistleblower can report the event with his/her identity or anonymously. Information and evidence provided to the Company must be clear and complete. Any incomplete information or evidences may result in the delay of investigation or the exclusion of the matters due to insufficient information.



## **7) Approval and Review of the Policy**

The Whistle Blowing Policy shall be reviewed at least annually.