



Practice and Policy

Subject : Whistle Blowing Policy

1) Introduction

In line with the good corporate governance of AAPICO Hitech Public Company Limited (Company), the Board of Directors has provided the opportunities and a channel for employees and stakeholders both internal and external to report complaints, leads, and any misconduct or actions that are against the Company's good corporate governance, against the anti-corruption policy, against the laws, and other relevant laws, in order to promote business operations that are transparent, appropriate, ethical and verifiable.

2) Objective

To provide channels for employees and all stakeholders, including shareholders, customers, suppliers and any third party to file complaints, leads, and any misconduct or actions that are against the Company's good corporate governance, against the laws, and other relevant laws, in order to promote business operations that are transparent, appropriate, ethical and in line with the Company's good corporate governance.

3) Definition

Whistleblowing means providing the Company with leads and information regarding illegal actions, violation of the Company's good corporate governance, violation of the Company's anti-corruption policy, regulations, code of conduct, etc.

Whistleblowers refers to employees, customers, business partners, both internal and external stakeholders who lodge the complaint or provide the lead.

Whistleblowing Unit refers to the Personnel Department, Audit Department, and Head of Department.

Investigation Committee refers to the Audit Committee, Internal audit Department Personnel Department and/or Personnel Department, appointed case by case by the Board of Directors.

The Accused refers to the Company's employees, executives, departments, directors accused of illegal actions, corruption-related offenses, bribery, violations of the Company's good corporate governance and other relevant rules.

4) **Scope of Whistleblowing, Complaints, and Misconduct**

The scope of Whistleblowing, Complaints, is conduct, and other suspicious behaviors include, but are not limited to the following:

1. Illegal actions, fraud, asset embezzlement, account concealment, corruption, and bribery
2. Damaging usage of Company's confidential information
3. Violations of Company and Government agency' policies, regulations, code of conduct, and other relevant regulations.
4. Actions that are negligent, self-interested, against the laws, public policy, Company's good corporate governance, and regulations.
5. Internal Control weaknesses

5) **Duty of Whistleblowers**

Whistleblowers must provide at least the following information:

1. Contact information including phone number, address, or email.
2. Credible information with sufficient details of event, documents or proof that allow for further investigation.

6) **Responsibilities**

Employees and Stakeholders are encouraged to disclose any information or report any violations against the Company's good corporate governance and the laws, including, but not limited to fraud, corruption, financial irregularities, dishonesty, criminal activities, and personal misconduct.

The Audit Committee and the Human Resources Department are assigned to be a contact window, validating and investigating complaints and reporting to the Board of Directors.

In some cases, the Board may assign directors or executives to handle the matter where appropriate.

All in all, the Audit Committee is required to report a collection of corruption-related leads to the Board of Directors once a year.

7) 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 to report to his/her supervisor, then the whistleblower can report the matter to the Whistleblowing Unit via the following channels.

i) Postal mail

Chairman of Audit Committee

AAPICO Hitech Public Company Limited

Unit No. 100/11, 9th Floor (Low Zone), Sathorn Nakorn Tower Building,

North Sathorn Road, Silom Subdistrict, Bangrak District, Bangkok 10500

Tel.: +66 2 613-1504

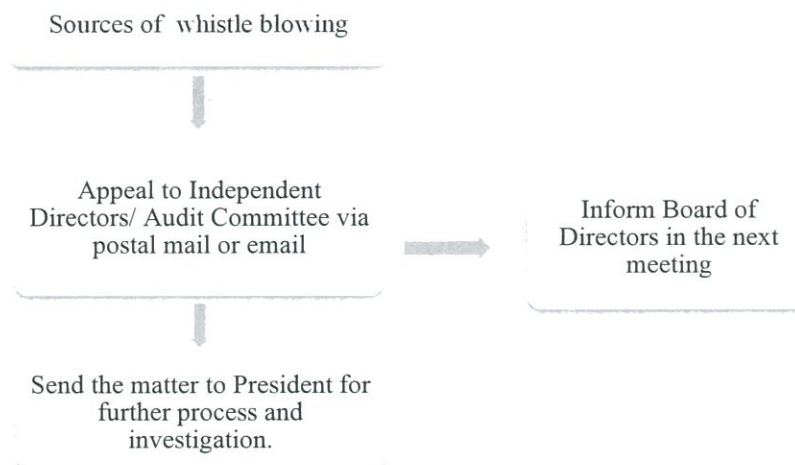
ii) E-mail

Chairman of Audit Committee

AAPICO Hitech Public Company Limited

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. Should there be a conflict of interest in the matter, the whistleblower must provide details of the nature of conflict of interest in writing and must not be a part of the investigation. In case claims are received over a phone call, the Audit Committee must notify the whistleblower to file a report in writing, validating the document with a signature. In the event the whistleblower refuses to do so, it is up to the Audit Committee to use their discretion to file and record such reports.



8) **Review Duration**

1. The Whistleblowing Unit files the claims and reviews relevant evidence and information.
2. The Whistleblowing Unit forwards the claims with relevant evidence to the Investigation Unit within 7 days.
3. The Investigation Unit completes the investigation process within 1 month after the receipt. Should it be deemed necessary, the investigation period may be extended, but must not exceed 2 months.
4. The status and result of the investigation are reported back to the whistleblower in writing, or any other methods deemed appropriate.

9) **False Claim**

All claims must be reported with honesty, in good faith, and with no intention to discredit any personnel or the Company as a whole. In case claims or any supporting documents submitted are proven to be false, the Company shall follow the Company's protocol and take legal actions.

10) **Whistleblower Protection Policy**

The Whistleblowing Unit must keep all claims and information confidential and must not disclose any information that could reveal the identity of the whistleblowers, unless otherwise granted permission, or is permitted by law. As an employee of the Company, the whistleblower will not be terminated, dismissed, demoted, or have salary reduced as a result of informing, all of which cases do not apply should the whistleblowers be punished or are subject to an investigation on other cases.

Review and Approval

Whistleblowing policy shall be reviewed at least annually to ensure effectiveness and its relevance to the Company's business and its operations.

This policy is owned by Corporate Office and has been approved by the Board of Directors at the Board Meeting No.120/2022 held on November 14, 2022.



Chairman of the Board of Directors

