

# Whistle Blowing Policy

Thantawan Industry Public Company Limited

## Whistle Blowing Policy

### 1. The Objective

Thantawan Industry Public Company Limited "The Company" adhering to business operations with honesty, transparency, morality and in accordance with good corporate governance principles and against corruption, regardless of any form. The company has set Whistle Blowing Policy to support and serve as a working channel for the directors, executives, employees and stakeholders of the company able to report clues and complaints with good faith. In case of being seen actions, suspicions of fraud, illegal acts, violation of rules, regulations, policies and business ethics, inequality, careless actions or lack of prudence. To improve or continue to be accurate, appropriate, transparent and fair. This Information of the whistleblower and the reporting subject will be kept secret to protect the case rights violated.

### 2. Definitions

the Company	means	Thantawan Industry Public Company Limited
Director	means	Directors of Thantawan Industry Public Company Limited
Executive	means	The executive takes a position of Chief Executive Officer, Deputy Chief Executive Officer and Assistant of Chief Executive Officer or equivalent of Thantawan Industry Public Company Limited
Employee	means	Employees and contract workers of Thantawan Industry Public Company Limited
Whistleblower	means	Employees and/or third parties who report clues or complaints to the Company's channel
Complaint Recipient	means	Chairman and/or Chairman of Audit Committee and/or Chief executive officer
Complaint manager	means	<p>Factist has the duty to appoint an investigation committee according to the case of the person being complained. Factist will consider the results of the investigation and consider the penalties according to the case of the person being complained as follows;</p> <ul style="list-style-type: none"> <li>- The person being complaint is an employee, the complaint manager is Chief Executive Officer.</li> <li>- The person being complaint is an executive, the complaint manager is Audit Committee.</li> <li>- The person being complaint is a director or the Company, the complaint manager is the Board of Director.</li> </ul>

Investigation Committee means Person or number of persons appointed by the complaint manager to conduct the investigation each time along with specifying the scope of duty to investigate the facts according to the case of complaint.

### 3. Scope of clues or complaints

Whistleblower or complainant can report clues or complaints about important matters which may have significant negative effects to the company as follows;

- 3.1. Illegal activities or non-compliance with the policy regarding to corporate governance, business ethics and anti-corruption policy.
- 3.2. Violations of the Company's rules and regulations.
- 3.3. Incorrect financial reports, defective internal control systems, and the preparation of false financial documents.
- 3.4. Any actions that are conflict of interest.

### 4. Whistleblowing and Complaint-filing

according to the corporate governance principle, the Company has provided reporting channel for clue notification or complaints, comments, or suggestions, which shows that the stakeholders who are affected or are at risk to be affected, which would cause damage to the all stakeholders from the business operations of the company, or from the directors' activities, executives or employees of the company about illegal activities or the violation of ethics. Including behaviors that may indicate corruption, unfair practice, lack of care and lack of prudence through the following channels;

1. By mail, Chairman of the Board of Directors or Chairman of the Audit Committee,  
Tantawan Industry Public Company Limited  
No. 123 Sun Tower Building 32, Vibhavadi Rangsit Road,  
Chomphon Subdistrict, Chatuchak District, Bangkok 10900
2. Email to the Chairman of the Board of Directors and Chairman of the Audit Committee  
board-thip@thantawan.com
3. Company website: [www.thantawan.com](http://www.thantawan.com)
4. Suggestion box / comments / complaints within the Company. (The person who in charge is Chief Executive Officer)



These the company's channel for reporting clues as a safe channel and able to give clues to the person when requesting information, clues to the informer later, or instructions regarding compliance Anti-corruption measures.

In this regard, the company will conduct the examination according to the procedure and record the investigation in writing. Without disclosing the name of the whistleblower including the collection of complaints to protect the impact May occur with those who report such clues.

## **5. Procession and duration time when receiving a clue or complaints**

The complaint recipient must submit complaint to the complaint manager within 3 working days from the date of receiving the complaint from the whistleblower in order to scrutinize information received from whistleblowers or complainant.

### **5.1 Employees**

In the case that employees are the person being complaints, "Chief Executive Officer" is the complaint manager by considering the appointment of an investigation committee, the investigation committee was appointed within 7 working days from the date of receiving the complaint, in order to conduct investigation, make a complaint control register, conclude the investigation proceedings and determine the punishment and propose to the complaint manager within 30 days from the date of appointment of the investigation committee. If the progress cannot be completed within the specified time, the investigation committee may propose to the complaint manager for approval an extend of investigation period. The extend of investigation period does not exceed 7 days in each case.

### **5.2 Executives**

In the case that executives are the person being complaints, "Audit Committee" is the complaint manager by considering the appointment of an investigation committee, the investigation committee was appointed within 7 working days from the date of receiving the complaint, in order to conduct investigation, make a complaint control register, conclude the investigation proceedings and determine the punishment and propose to the complaint manager within 30 days from the date of appointment of the investigation committee. If the progress cannot be completed within the specified time, the investigation committee may propose to the complaint manager for approval an extend of investigation period. The extend of investigation period does not exceed 7 days in each case.

### **5.3 Director and/or the Company**

In the case that directors and the Company are the person being complaints, "the Board of Director" is the complaint manager by considering the appointment of an investigation committee, the investigation committee was appointed within 7 working days from the date of receiving the complaint, in order to conduct



investigation, make a complaint control register, conclude the investigation proceedings and determine the punishment and propose to the complaint manager within 30 days from the date of appointment of the investigation committee. If the progress cannot be completed within the specified time, the investigation committee may propose to the complaint manager for approval to extend the investigation period. The extension of the investigation period does not exceed 7 days in each case.

If the investigation committee cannot complete the task within the specified period or does not request an extension of the time specified above, the Audit Committee must not comply with this regulation and must submit a letter to the complaint manager with reasons.

## 6. Summary reporting

6.1 Investigation Committee has the duty to report a summary of complaints and penalties to the Complaint Manager according to the case of the person being complained in Section 5.

6.2 Complaint Manager in each case, according to Section 5, has the duty to inform a summary of complaints and penalties for Whistleblower, the person who is being complained, Complaint Recipient, the person who cooperates in the investigation and other persons as appropriate.

6.3 Internal Audit Department must collect statistics information and clues related to corruption in all cases including complaints that have been terminated and penalties and report to the Board of Directors for acknowledgment at least once a year.

## 7. Investigation and penalties

After investigating the information or evidence that is reasonable, if it is believed that the alleged accused has engaged in corruption, illegal acts, breaches rules and regulations or the company's code of ethics, the Company will give the right to the accused to be informed of the allegations and prove themselves by seeking additional information or evidence to show that they are not involved in the alleged offense.

The Company will consider and punish those who are guilty of corruption as employees in accordance with the regulations. Disciplinary punishment of employees specified by the Company and may be punished or may be claimed for damages as required by law. If a person committing a corruption offense is a director to comply with relevant legal procedures and may be punished or may be claimed for damages as required by law.

If the accused commits corruption, illegal acts, breaches rules and regulations, or the company's code of ethics, whether they are directors, executives, staff or employees of the company, they are deemed to commit

an offence regarding to a violation of the anti-corruption policy, corporate governance policy, company's code of ethics. They must be considered disciplinary action according to the company's regulations and if the action is against the law offenders, they must be punished both legally and disciplinary penalties as regards with the company's regulations.

#### **8. Whistleblower Protection Mechanism**

To protect the rights of the complainant and the person who provided the information in good faith. The Company will conceal the name, address of any information that can identify the complainant or informant. By keeping the information of the complainant and the person who provided the information is confidential. Only those who are responsible for checking the complaint will be able to access information.

In the case of complaints regarding corruption of the directors or executives. The Audit Committee will protect the whistleblower, the complainant, witness and person who provided information in the investigation of the facts. Not to be affected by danger, unrighteousness caused by clues, complaints, witnesses or providing information.

Those who are responsible for complaints must keep the information, complaints and documents of the complainant, including those who provide information confidential. Do not disclose information to other people who are not involved. Unless it is disclosed as required by law.

#### **9. False whistleblowing or complaints**

When the company finds, with evidences, any whistleblowing and complaints, wordings, or information that it was done with bad faith, false intent, and intended to cause damage and the Company found that it is an employees of the company who has done this, they will be disciplined according to the company's regulations. However, if it is a third party causing the company to be damaged, the Company will consider legal proceedings against that third person as well.

#### **10. Effective Date**

This Whistle blowing policy will be effective from February 1, 2021 onward and cancel the Whistleblowing policy dated August 14, 2018.

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Approved by the board of directors meeting no. 1/2021 on January 15, 2021.