

## Practice of Investigation, Inspection and Punishment

For the investigation, inspection and penalties to be in consistency with the whistleblowing as well as for fairness to all the employees, the following guidelines on investigation, inspection and penalties are provided: -

### 1. Investigation and Inspection Process

Upon receiving complaints from any channels, the human resource department and the company secretary will follow the procedures outlined in Annex 6.3 & 6.4 and proceed as follows:

#### 1.1 If an employee at level 0-11 is complained:

- 1.1.1 The human resource department and the legal department determine that the complaint involves corruption; the legal department will forward the matter to the chief executive officer to appoint an ad hoc committee within three business days.
- 1.1.2 The ad hoc committee shall investigate, find facts, witnesses and evidence for inspection in the first place, as well as verify documents, complainants, informants and witnesses in order to get enough facts and evidence to consider whether there is the misconduct as complained or not within 15 days.
- 1.1.3 In the event that the ad hoc committee investigates and checks the facts, witnesses and evidence in the first place, and get inadequate information, witnesses and evidence to prove that there is a misconduct, the ad hoc committee shall make a report and ask the chief executive officer for closing the case, then inform the result to the complainant within three working days.
- 1.1.4 In the event that the ad hoc committee investigates and checks the facts, witnesses and evidence in the first place, and prove that there is a misconduct, the ad hoc committee shall submit a letter of allegation to the suspect or the complaine within three working days from the date of indicating grounds of misconduct. The date of informing the allegation shall be deemed the date of acknowledging the allegation. The complaine shall submit a letter to explain or appeal against the allegation together with showing or specifying any witness or evidence (if any) to the ad hoc committee within 15 days from the date of acknowledging the allegation.
- 1.1.5 The ad hoc committee's allegation shall be inspected and proved within 60 days from the date of indicating grounds of misconduct.
- 1.1.6 In the event that the allegation cannot be investigated to gather facts, witnesses and evidence or inspected within the specific time as defined in no. 1.1.5, the chair of the ad hoc committee shall report to the chief executive officer to ask for extension of inspection period. Two extensions are allowed with a maximum of 15 days per each time.
- 1.1.7 In the event that the ad hoc committee cannot perform the inspection within the specific time without informing any reason to ask for extension of inspection period, it is deemed that the

ad hoc committee fails to comply with this anti-corruption policy. The chief executive officer has the discretion to expedite the case.

- 1.1.8 In the event that the ad hoc committee inspects and considers that the suspect is innocent or there is some misunderstanding, the ad hoc committee shall report the result to the chief executive officer and ask for closing the case, then inform the result to the complainant within three working days. The chief executive officer shall order the human resource department to close the case and inform the complainee.
- 1.1.9 In the event that the ad hoc committee inspects and considers that the suspect is guilty, the ad hoc committee shall report the result to the chief executive officer to ask for approval of any disciplinary action and/or legal proceedings (if any) within 10 working days, then inform the result to the complainant within three working days. The chief executive officer's decision is final.
- 1.1.10 In the event that a complainee is guilty, the ad hoc committee shall inform in writing the result of punishment to the human resource department for proceeding the penalty.
- 1.1.11 The following details shall be stated in a report of inspection and complaint outcome: -
  - (1) Complainee's name and position
  - (2) Complaint's subject
  - (3) Complaint and conclusion of facts
  - (4) Reason of determining the outcome
  - (5) Conclusion of opinions on the complaint
- 1.1.12 The human resource department will notify the receipt of the complaint and the investigation results through the secretary of the audit committee and the secretary of the corporate governance committee for reporting to the respective committees.

**1.2 If an employee at level 12 upward to the director is complained:**

- 1.2.1 When the company's secretary receives the complaint of employee in level 12 upward to the director from Human Resource Department or legal Department already, the company secretary shall make a report of the complaint to the chair of the board to submit a circular letter to the board of directors, asking for appointment of an investigation committee within three working days to take charge of the investigation.
- 1.2.2 Upon receipt of the circular letter, the board of directors shall vote for appointment of the investigation committee and submit the letter back to the company secretary within three working days. The investigation committee, consisting of a minimum of three voted directors and the company secretary as the secretary, has authority to carry out an investigation, fact finding and inspection to gather witnesses and evidence or prove the alleged misconduct, and report the result of the inspection to the board of directors.

The investigation committee might assign any person to investigate, check facts and inspect in order to gather witnesses and evidence for the investigation committee to consider the alleged misconduct.

- 1.2.3 The investigation committee or the authorized deputy shall investigate, find facts, witnesses and evidence for inspection in the first place, as well as verify documents, complainants, informants and witnesses in order to get enough facts and evidence to consider whether there is the misconduct as complained or not within 15 days.
- 1.2.4 In the event that the investigation committee investigates and checks the facts, witnesses and evidence in the first place, and get inadequate information, witnesses and evidence to prove that there is a misconduct, the authorized deputy, on behalf of the investigation committee, shall make a report and submit a circular letter to ask the board of directors for closing the case, then inform the result to the complainant within three working days.
- 1.2.5 In the event that the investigation committee investigates and checks the facts, witnesses and evidence in the first place, and prove that there is a misconduct according to the anti-corruption policy, the investigation committee shall submit a letter of allegation to the suspect or the complainee within three working days from the date of indicating grounds of misconduct. The date of informing the allegation shall be deemed the date of acknowledging the allegation. The complainee shall submit a letter to explain or appeal against the allegation together with showing or specifying any witness or evidence (if any) to the investigation committee within 15 days from the date of acknowledging the allegation.
- 1.2.6 The investigation committee's allegation shall be inspected and proved within 60 days from the date of indicating grounds of misconduct.
- 1.2.7 In the event that the allegation cannot be investigated to gather facts, witnesses and evidence or inspected within the specific time as defined in no. 6, the chairman of the investigation committee shall report to the chairman of the board to ask for extension of inspection period. Two extensions are allowed with a maximum of 15 days per each time.
- 1.2.8 In the event that the investigation committee cannot perform the inspection within the specific time without informing any reason to ask for extension of inspection period, it is deemed that the investigation committee fails to comply with this anti-corruption policy. The chairman of the board has the discretion to expedite the case.
- 1.2.9 In the event that the investigation committee inspects and considers that the suspect is innocent or there is some misunderstanding, the investigation committee shall report the result to the chairman of the board to ask for closing the case, then inform the result to the complainant within three working days. The company secretary shall close the case and inform the complainee
- 1.2.10 In the event that the investigation committee inspects and considers that the suspect is guilty, the company secretary shall submit a circular letter of the result to the board of directors or

summon a board of directors meeting, as necessary and appropriate, to ask for approval of the disciplinary action and/or legal proceedings (if any) within 10 working days, then inform the result to the complainant within 3 days. The board meeting's resolution is final.

1.2.11 The company secretary shall make a letter to the chairman of the board to sign on the order of punishment.

1.2.12 The following details shall be stated in a report of inspection and complaint outcome: -

- (1) Complainee's name and position
- (2) Complaint's subject
- (3) Complaint and conclusion of facts
- (4) Reason of determining the outcome
- (5) Conclusion of opinions on the complaint

## 2. Report of Complaint Outcomes

The company shall make a report of complaint outcomes at least once a year. The Summary Report of Anti-Corruption Policy Violation shall be made according to annex 2.6.

2.1 If the complainee is an employee at level 0-11, the human resource department shall submit such a report to the secretary of the corporate governance committee for proposing it to the corporate governance committee.

2.2 If the complainee is an employee at level 12 upward to the director, the company secretary shall make such a report and propose it to the board of directors.

## 3. Damage Remedy Measures

The persons who have been damaged from whistleblowing can request for damage remedy under the following measures: -

3.1 Such a person can request for damage remedy upon submission of the complaint or before the end of the inspection. Such a damage remedy cannot be requested later.

3.2 Such a person shall file a written request for damage remedy to the ad hoc committee or the investigation committee, as the case may be, with the following details: -

- Name of the person who has been affected
- Incident
- Impact
- Damage remedy measure
- Evidence

Those who have been affected will not gain remedy in the event that the ad hoc committee or the investigation committee, as the case may be, considers such persons involve with any support for violation of the anti-corruption policy.

#### 4. Penalties

The company realizes the importance of anti-corruption. Any action in breach of the anti-corruption policy is deemed guilty. Some penalties are defined as follows: -

- 4.1 In the event that a suspect commits any fraud or corruption and violates any of these anti-corruption guidelines, it is deemed in breach of the anti-corruption policy. The suspect shall be punished with any disciplinary action according to the company's work regulations. In the case that such a fraud or corruption is unlawful, the wrongdoer shall be punished with any legal penalty.
- 4.2 All the directors, the management, the chief executive officer and the employees shall strictly comply with the anti-corruption policy. In case of violating the anti-corruption policy, such a director or employee is deemed in breach of the work regulations and shall be punished with a disciplinary action fairly and uniformly without discrimination on position, duty, employee level and gender.
- 4.3 In the event that a representative, middleman, distributor/service provider or contractor violates any of these anti-corruption policies, the company will immediately consider terminating the business with such a person.
- 4.4 If an investigation finds that the complaint is unfounded and the informant intended to harass the accused, the ad hoc committee or the investigative committee, as appropriate, may recommend disciplinary action to the chief executive officer or the board of directors, as appropriate, for disciplinary measures.

#### 5. Punishment

In the event that the ad hoc committee or the investigation committee considers the suspect is guilty, some penalties to the wrongdoer shall be considered uniformly, regardless of employee level, as follows: -

- 5.1 If an employee at level 0-11 is a wrongdoer,  
The chief executive officer has authority to consider a penalty which is proposed by the ad hoc committee according to the company's work regulations and the Labor Protection Act B.E. 2541 (2008). In the event that such a misconduct is unlawful, legal proceedings might be considered as well.
- 5.2 If an employee at level 12 upward to the director is a wrongdoer,  
The board of directors has authority to consider a penalty which is proposed by the investigation committee according to the company's work regulations, mutatis mutandis. In the event that such a misconduct is unlawful, legal proceedings might be considered as well.
- 5.3 The complaint outcomes and the penalties to any complainee, considered by the chief executive officer or the board of directors, as the case may be, are final.