

## Whistleblowing Policy

### SCG Chemicals Public Company Limited

The Board of Directors Meeting of SCG Chemicals Public Company Limited (“the Company”) No. 277 (13/2021) held on October 22, 2021 resolved to approve the first Whistleblowing Policy, and the Board Meeting No. 282 (3/2022) held on March 30, 2022 subsequently endorsed the continuous enforcement of the Policy upon the conversion of the Company into a public limited company.

The Company and its subsidiaries (collectively called "SCG Chemicals") realizes the importance of preventing corruption or misconduct of operation and contacting with persons having interests which may affect decision and business operation of SCG Chemicals. Therefore, SCG Chemicals establishes a mechanism for receiving whistleblowing and procedure in the event that whistleblowing regarding a breach of legal requirement, wrong doing of rules, regulations and code of conduct of SCG Chemicals or suspected act of corruption including protection measures to bring fairness to whistleblower regarding corruption or non-compliance of laws, rules, regulations and code of conduct.

The aforesaid Board of Directors Meeting, then, resolved to approve the Whistleblowing Policy to assure that clear guidance and efficient handling of whistleblowing regarding corruption and misconduct are in place.

#### **1. Objectives**

- 1.1 The receiving of whistleblowing regarding corruption, misdeed and misconduct of regulations of SCG Chemicals is processed appropriately, efficiently and complies with good corporate governance principle.
- 1.2 Employees and any parties acting on behalf of SCG Chemicals conduct the business lawfully, transparently, fairly and verifiably by following applicable laws, good corporate governance guidance, business ethics and regulations of SCG Chemicals.
- 1.3 Any person willing to report SCG Chemicals on misconduct of operation or suspicious of misconduct made by a director, employee or person acting on behalf of SCG Chemicals can do so via channels provided by SCG Chemicals.
- 1.4 The informants or whistleblowers or persons assisting SCG Chemicals honestly are appropriately and fairly protected and prevented from maltreatment caused by raising the whistleblowing.
- 1.5 The concerned persons are prevented from any risk and damage arising from breach of laws, business ethics or acts of a director, executive and employee of SCG Chemicals.

#### **2. Definitions**

- 2.1 “Misconduct” means any act of doing or not doing by the personnel which breaches laws, articles of association, code of conduct, working rules, policy and regulations of SCG Chemicals.
- 2.2 “Personnel” means director, executive and employee of SCG Chemicals and its subsidiaries.
- 2.3 “SCG Chemicals” means the Company and its subsidiaries
- 2.4 “Subsidiary” means a subsidiary company included in the consolidated financial statements of SCG Chemicals.
- 2.5 “Whistleblower” means the personnel including any person having interests who reports or raises any misconduct occurred in SCG Chemicals.

### **3. Persons Having Rights to Raise Whistleblowing**

- 3.1 Any person or the personnel of SCG Chemicals who witnesses misconduct.
- 3.2 An employee who is maltreated, threatened or disciplinary punished such as reduced salary level, suspended, fired or discriminated by unfair act related to employment conditions caused by his or her raising of whistleblowing, providing information or going to provide information, assisting during investigation process or collecting information to persons receiving whistleblowing including legal prosecution, being witness, giving statements, or any cooperating to court or government agency.
- 3.3 If there is sufficient evidence that the whistleblower has raised the whistleblowing dishonestly, SCG Chemicals considers it is necessary to protect the reputation of the respondent as follows:
  - 3.3.1 investigating and punishing pursuant to SCG Chemicals' regulations if the whistleblower is the personnel of SCG Chemicals;
  - 3.3.2 considering legal action if the whistleblower is an external party and damage occurs to SCG Chemicals.

### **4. Scope of Whistleblowing**

- 4.1 The personnel or any person acting on behalf of SCG Chemicals may be the respondent under this policy if he or she commits a misconduct.
- 4.2 However, SCG Chemicals will not receive the following cases:
  - 4.2.1 a case that the general meeting of Shareholders, Board of Directors, Audit and Risk Management Committee, Management Committee or Chief Executive Officer and President has already resolved according to its power of authorities;
  - 4.2.2 a case that has been processed in the court or already judged or ordered by the court;
  - 4.2.3 a case from non-personnel without genuine name and address of the whistleblower;
  - 4.2.4 a case without identified witness, clue, evidence or act of corruption or misconduct as sufficient to further investigate for more fact and finding;
  - 4.2.5 a case that the Human Resource Office of SCG Chemicals or its subsidiaries or other authorized office has already received, considered or decided fairly and no additional material evidence is newly provided.

### **5. Channels for Filing Information or Raising Whistleblowing**

- 5.1 Employees can raise whistleblowing via SCG Chemicals' intranet website, which is accessible to every employee. Whistleblower can direct their whistleblowing, with or without identifying their names, to any of the following:
  - Trusted supervisors
  - The Director of the Corporate Human Resources Office
  - The Director of Internal Audit Office
  - The Secretary to the Board of Directors
  - Any Director of the Company

The whistleblowing can also be submitted verbally or formally via letters or e-mails to any of the aforementioned parties.

- 5.2 For external parties, whistleblowing can be lodged on [www.scgchemicals.com](http://www.scgchemicals.com) under the Whistleblowing System. Whistleblowers are required to identify their names and can direct their whistleblowing to any of the following:
  - Corporate Secretary Office
  - Internal Audit Office
  - An Independent Director
  - Audit and Risk Management Committee

Whistleblowing can also be lodged in the form of a formal document submitted to any of the aforementioned parties.

## **6. Whistleblower Protection**

- 6.1 Whistleblowers who are personnel of SCG Chemicals may choose to hide their identities if they feel that they might be adversely affected. However, valid details or evidences must be provided to prove that the reported corruption or misconduct is not fraudulent. However, if the whistleblowers reveal their names, SCG Chemicals will be able to notify them of progress and mitigate impact with greater ease and convenience.
- 6.2 SCG Chemicals considers all relevant information confidential and will reveal only as necessary, taking into consideration the safety and possible consequences to the whistleblowers, information sources, or parties related to SCG Chemicals.
- 6.3 If the whistleblowers feel that their safety is threatened or that they may be affected, they may request appropriate protection measures from SCG Chemicals. SCG Chemicals may prescribe protection measures without such a request if it appears that the whistleblower is likely to be affected or put in danger.
- 6.4 Those affected will receive compensation through an appropriate and fair process.

## **7. Whistleblowing Investigation**

- 7.1 The whistleblowing recipient is to investigate and verify the validity or assign reliable persons or divisions to verify the validity. The preliminary investigation should reach a conclusion within 30-60 days, depending on its complicacy. After the investigation is finalized, progress reports are also made to the whistleblowers within seven days if their identities are identified.
- 7.2 The whistleblowing recipient or the assigned person can invite any personnel to provide information or send any relevant documents for investigation.
- 7.3 If the investigation results that the misconduct is committed, SCG Chemicals will proceed as follows:
  - 7.3.1 If the misconduct regards to breach of laws, rules, regulations or code of conduct, the case is to be proposed with opinion and correct guidance to SCG Chemicals's authorized person to consider. The case which is considered material such as having impact to reputation or financial performance of SCG Chemicals, conflict with the business policy of SCG Chemicals, or related to executives of SCG Chemicals is to be proposed to the Audit and Risk Management Committee or the Board of Directors for their consideration.
  - 7.3.2 If the misconduct brings damage to any party, SCG Chemicals is to propose appropriate and fair remedy measurement to sufferers.

## **8. Punishment**

- 8.1 If the accused person commits the misconduct, he or she is to be considered and punished according to disciplinary punishment of SCG Chemicals and if said misconduct breaches the laws, he or she will be legally punished according to civil, criminal or other laws. Disciplinary punishment and/or decision of the Audit and Risk Management Committee or the Board of Directors are considered final.
- 8.2 The personnel who acts with other person unfairly, with inappropriate method or causing damage to such person as resulted from such person's whistleblowing or reporting information or providing clues regarding misconduct is considered breaking discipline and subject to punishment, provided that the punishment may include those prescribed by laws if said misconduct is breach of laws.

## **9. Communication**

- 9.1 SCG Chemicals will communicate and disclose this Whistleblowing Policy and whistleblowing channels to the personnel through several media such as new director and employee orientation, training, seminar, publishing in workplace and via electronics system of SCG Chemicals, etc. to assure the understanding of the personnel and their strict compliance under this policy.
- 9.2 SCG Chemicals will communicate and disclose this Whistleblowing Policy and whistleblowing channels to public, subsidiaries, affiliates and stakeholders through several channels such as SCG Chemicals's website, annual report, annual registration statements, etc.

This Policy shall be effective from October 22, 2021 onwards.

**Announced on April 4, 2022**

*-signed by-*

**(Mr. Chumpol NaLamlieng)**

**Chairman of the Board of Directors**