

Whistle Blowing Policy

Carabao Group Public Company Limited and Subsidiaries

Carabao Group Public Company Limited ("the Company") is committed to maintaining corporate governance practices that meet standards of corporate governance for all stakeholders of the Company. As stated in the Corporate Governance Policy, the Company has set up measures for supervising and receiving complaints from all stakeholders through various channels of the Company.

Whistle Blowing Policy ("Policy") is formulated to serve as a guideline for receiving and handling complaints, as well as to protect the stakeholders of the Company for the stakeholders to report their complaints effectively and responsibly on corporate governance and business ethics. The Company will keep the information obtained from such reports confidential.

Therefore, the Company formulates this Policy with the following objectives:

- a. To provide actions related to receiving complaints/whistleblowing on corruption, misconduct, and practices that are contrary to the Company's regulations, as well as the case of being affected by the Company's business operations or the Company's personnel, with appropriate and effective procedures in accordance with the principles of good corporate governance.
- b. To guide all the directors, executives, or any employees acting on behalf of the Company to conduct business with accuracy, transparency, fairness, and accountability under the law, good corporate governance, business ethics, and the Company's policies and regulations.
- c. To encourage those who wish to submit complaints/whistleblowing about the performance of directors, executives, or any person acting on behalf of the Company, that is contrary to or suspects that is contrary to good corporate governance and business ethics to notify the Company through various complaints /whistleblowing channels set by the Company.
- d. To provide safety and protection for the complainant/whistleblower and any personnel who cooperate with the Company in good faith, as well as to protect them from any harassment that may result from their complaint properly and fairly.

1. **Definition**

"Company's personnel" means the Chairman of the Board, directors, executives, and employees at all levels of the Company.

"**Misconduct**" means any act or omission of the Company's personnel that is a violation of the Charter and the Code of Conduct, policies, rules and regulations of the Company, and laws that are related to the Company's business operations.

"**Corruption**" means any action to seek unlawful benefits for oneself and others, including bribery in any form, such as offering promises to give, promising to give or accept money, property, or any other form of benefit to government officials, government agencies, private entities, or persons having duties, whether directly or indirectly, to enable such persons to perform or refrain from performing their duties to obtain or maintain business, recommending a business to the Company specifically, or to obtain or maintain any other unsuitable business interests.

"**Complainant/Whistleblowers**" means stakeholders of the Company who witnessed or were affected by an action or event and then reported complaints or clues through the Company's complaints/whistling channels.

"**Complaint Management Committee**" means the Complaint Management Committee which was appointed by the Chief Executive Officer to be responsible for receiving complaints/clues and carrying out complaint handling operations, which consists of representatives from the various departments as follows.

1. Internal Audit Department
2. Risk Management Department
3. Legal Department
4. Human Resource Department
5. Company Secretary
6. The **senior management** of the Factory

2. Scope of Policy

The Policy is formulated to encourage stakeholders of the Company to file complaints or disclose information showing an impact caused by the Company's business operations, violations of laws, policies, rules, regulations, or business ethics such as:

- Corruption
- Fraud, embezzlement, theft, or damage to the Company's property
- An act of dishonesty for the benefit of oneself or others
- Actions that cause harm or affect physical/mental safety
- Actions with the intention of causing damage or loss to the Company
- Violation of the Company's business ethics
- Being affected by the Company's products or services
- Being affected by the Company's business operations and the actions of the Company's personnel

- Actions or advocacy to break laws, policies, rules, regulations, and business ethics, as well as concealing or assisting in the concealment of such violations
- Other actions that have an impact on the complainant or another individual

3. Confidentiality

The Policy is formulated to ensure that complaints from complainants/whistleblowers will be taken seriously and complainants/whistleblowers will not suffer from the reporting of complaints/whistleblowing with good intentions. The disclosure information of the complainant will be kept confidential. However, by reporting complaints/clues, the complainant should carefully collect and check the accuracy of the information before reporting or disclosing it.

4. Protection Measures for Complainants/Whistleblowers

The Company will not act unfairly toward the complainant/whistleblower as well as employees or any other person employed to work for the Company who is the complainant/whistleblower, whether by changing their job position, nature of work or workplace, suspending work, intimidating, interfering with work, termination of employment, or any other act that is unfair to such person; only because this particular personnel:

4.1 Provides information, cooperates, or assists in any way related to complaints/whistleblowing of actions that violate the laws, regulations, and business ethics of the Company.

4.2 Gives statements, submits evidence, or is a witness for the benefit of consideration or investigation of the suspected case that are violations or non-compliance with laws, regulations, or the Company's business ethics.

In addition, any person who has been informed of complaints/whistleblowing or information related to this complaint/whistleblowing must protect the confidentiality of information about complaints/whistleblowing, not disclose it to other people, and consider the safety and damage of the complainant/whistleblower and the source of data or related personnel into account, except for the case where it is necessary to proceed according to the Company's regulations or as required by law. If there is an intentional violation of the disclosure of information, the Company will take disciplinary action and/or take legal action against those who violate, as the case may be.

5. Channels for Filing Complaints/Whistleblowing

Stakeholders of the Company or those who witnessed the action and would like to report complaints/whistleblowing can report complaints/whistleblowing via the following channels:

5.1 Channels for other stakeholders outside the Company

5.1.1 Mail to the Audit Committee, Chief Executive Officer, or Company Secretary of
Carabao Group Public Company Limited

393, 393 Silom Building 7th - 10th floor, Silom Road, Silom, Bangrak, Bangkok 10500

5.1.2 Website: www.carabao.co.th , www.carabaogroup.com

5.1.3 Email: whistleblowing@carabao.co.th

5.1.4 Phone: +66 2636 6111

5.2 Channels for personnel within the Company

QR Code :



<https://apps.powerapps.com/play/e/default-97bd2cff-8b6b-44df-a9b9-96ef97bee285/a/672832d4-ee88-479f-b567-8537e57f2611?tenantId=97bd2cff-8b6b-44df-a9b9-96ef97bee285&source=portal>

6. Procedures and Duration of Investigation

6.1 When notified of complaints/whistleblowing, the Complaint Management Committee will review the preliminary information, categorize, and determine the degree of significance. If there is no significance, the Complaint Management Committee will review the information with those involved in complaints/whistleblowing and set the procedure or assign the case to other departments involved with the matter to take action and then notify the Complaint Management Committee.

6.2 If the complaint/whistleblowing is significant, the Complaint Management Committee must present it to the Chief Executive Officer or Executive Committee to appoint a committee to investigate and find additional facts and set preliminary management guidelines.

6.3 The Complaint Management Committee is assigned to report the progress, summary of the investigation, and propose management guidelines to the Chief Executive Officer or the Executive Committee.

6.4 Relevant departments will proceed by following the management guidelines that are recommended by the Complaint Management Committee, along with reporting on the progress of the procedure.

6.5 The Complaint Management Committee will report the procedure on complaints/whistleblowing to the Chief Executive Officer, the Executive Committee, the Audit Committee, and the Board of Directors as they consider appropriate.

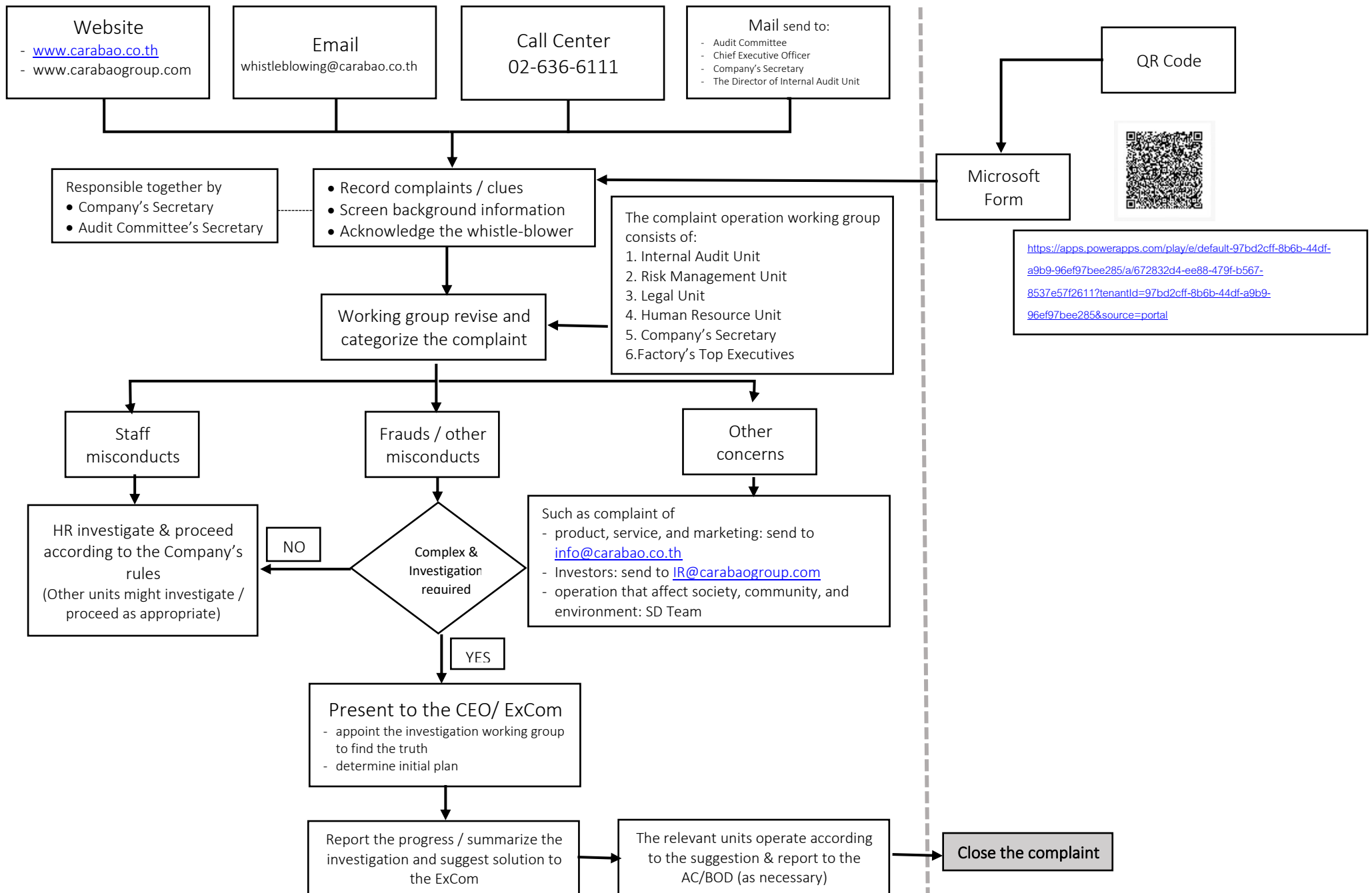
6.6 The Complaint Management Committee will determine the person responsible for coordinating the obtaining of the facts, reporting process of the procedure, and making a conclusion and guidelines to be arranged with the complainant/whistleblower.

6.7 The Complaint Management Committee must give the accused person the right to be informed of the complaint and a chance to prove themselves by seeking additional information or evidence showing that they are not involved in the complaint.

6.8 The procedure for complaints/whistleblowing will begin as soon as possible, considering the serious nature of complaints/whistleblowing with caution so that it will not affect the quality and details of the investigation. Except for the case of necessity, a preliminary investigation will determine the conclusion of the investigation and will be conducted within 2 weeks of the date that complaints or whistleblowing were received.

External Complaints Receiving Channel

External Complaints Receiving Channel



9. Penalty

9.1 If the accused person has committed the offense according to the complaints/whistleblowing, whether they are a director, an executive, or an employee, they will be considered a violator of the Anti-Corruption Policy, Charter, or Code of Conduct (depending on each case) and will be subject to disciplinary action under the regulations set by the Company. If the act is illegal, the offender shall be subject to legal, civil, or criminal penalties or under other laws.

9.2 Whoever acts willfully or negligently to not comply with the Policy, including harassing, intimidating, disciplinary actions, or discrimination in an unfavorable way due to complaints of the complainant or persons related to complaints under the Policy, will be deemed to have committed a breach of discipline and must be responsible for compensation to the Company or those affected by such actions, as well as be liable under the relevant laws.