

**Regulation
No. BDR. MBK 002/2023
Whistleblowing or Complaint Policy**

Due to the Company Group of MBK (the Company Group) conducting business with good corporate governance, it has established a policy for reporting incidents or complaints regarding illegal acts, regulations, ethics, code of conduct, and inappropriate behavior or behavior that may lead to corruption of individuals within the organization and all stakeholders. This policy includes mechanisms to protect and safeguard whistleblowers, complainants, and those who provide information with integrity as well as those who reject corruption to ensure that reported incidents or complaints are kept confidential to instill confidence in such whistleblowers, complainants, and informants as well as those who reject corruption. As a result, this policy is applied the Company Group of MBK. Therefore, it has been deemed appropriate to repeal the Regulation No. BDR. 003 regarding the policy for reporting incidents or complaints dated October 15, 2021, and replace it with this new regulation until further changes are made. The details of this new regulation are as follows:

1. Objectives

- 1.1 It is encouraged directors, executives, and employees of the Company Group to conduct proper, transparent, fair, and accountable business practices to comply with the corporate governance code, business ethics, the Company Group's code of conduct, and anti-corruption.
- 1.2 It is encouraged directors, executives, employees, and stakeholders to help monitor the behavior or actions of individuals within the organization who violate laws, regulations, or code of conduct, or exhibit inappropriate or unethical behavior that may lead to corruption. Such whistleblowers or complainants should report with integrity so that the Company Group can make appropriate improvements or take corrective actions to ensure accuracy, appropriateness, transparency, and fairness.
- 1.3 It is to ensure that whistleblowers, complainants, or informants, including those who refuse to engage in corruption, are confident that the Company Group shall protect and mitigate the impact of retaliation resulting from whistleblowing, complaining, providing information, or refusing to engage in corruption. This includes providing feedback to whistleblowers or complainants if the action is done with integrity.

2. Definition

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| 2.1 The Company Group | means MBK Public Company Limited and its subsidiaries/affiliated companies under control. |
| 2.2 Individuals in the organization | means directors, executives, and employees of the Company Group, including regular employees, probationary employees, and temporary employees who are hired by the Company Group in exchange for wages. |
| 2.3 Audit Committee | means the Audit Committee of the Company Group. |
| 2.4 Discipline and Anti-Corruption Committee | means the committee responsible for reviewing wrongdoing and corruption, |

	including offenses and actions of the Company Group involved in corruption.
2.5 A whistleblower or complainant	means the employee, executives, or director of the Company Group or any third party who has witnessed or knew about any actions violating laws, regulations, code of conduct, or behavior that is inappropriate or lead to corruption of any individual in the organization of the Company Group or any individual who acts on behalf of the Company Group.
2.6 A person who refuses to engage in corruption	means the individual within the organization of the Company Group or individual who acts on behalf of the Company Group and refuse to engage in corruption.
2.7 A complaint receiver	means the person who receives complaints from various channels of whistleblowing or complaint.
2.8 A complaint handler	means the director of Human Resources Department who is responsible for Receiving and notifying information, as well as summarizing the results of the proceedings.

3. Scope

This covers any person upon seeing or suspecting or having a reason to believe that any individual within the organization of the Company Group or any individual acting on behalf of the Company Group has violated the law, regulations, ethics, or code of conduct, or has engaged in behavior that is inappropriate or may lead to corruption, including any person being effected by the denial of corruption, whether financial or non-financial, and any person in the case of unfair treatment at work.

4. Regulation or Practice

4.1 Conditions and Considerations for Whistleblowing or Complaints

- 4.1.1 The details of whistleblowing or complaint must be truthful and supported by adequate witnesses or evidences that demonstrate that there are reasons to investigate the truth and to proceed with further actions.
- 4.1.2 Whistleblowers or complainants may choose not to disclose their name, address, or contact telephone number if they believe that revealing such information would jeopardize their safety or cause any harm. However, in cases where disclosure is made, it shall allow for reporting progress, requesting additional useful information, providing clarification of the facts, or mitigating damage more conveniently and expeditiously.
- 4.1.3 The information received shall be considered confidential and shall only be disclosed as necessary to ensure the safety and protection of the informant. The Company Group shall not disclose the name of the whistleblower or complainant unless consent is given.

4.1.4 Whistleblowers or complainants shall be protected, regardless of whether they are individuals in the organization or third parties.

4.1.5 The duration of the complaint-handling process depends on the complexity and adequacy of the documents as well as the evidence received from the complainant. Individuals in the organization must cooperate in verifying and providing various facts in cases of witnessing the occurred misconduct or corruption.

4.2 Protection of Whistleblowers, Complainants, or Those Providing Additional Information

The Company Group shall protect whistleblowers, complainants, or those who provide additional information or refuse to engage in corruption, as follows:

4.2.1 Not disclose the information and identity of the whistleblower, complainant, and those who provide additional information or refuse, engage in corruption. If disclosed, information shall be disclosed as necessary with the consideration of safety and of the informant and those involved.

4.2.2 Not make any job changes such as termination, suspension, job transfer, threats or any actions that are unfair to the whistleblower, complainant, informant, or those who refuse to engage in corruption.

4.2.3 Any individual who becomes aware of a complaint or information related to the complaint must keep the information and not disclose it to others, taking into account the safety and harm of the complainant and the person providing additional information. If intentionally violating this rule, the person may face disciplinary action and/or legal action, depending on the case.

4.3 Dishonest Complaint

Any whistleblower or complainant or informant who is an employee of the Company Group and can prove that they had the intention to provide false whistleblowing, complaint, or false information shall be subject to disciplinary action. If it is a third party whose actions damage to the Company Group, appropriate actions shall be taken into consideration.

4.4 Whistleblowing or Complaint Channels

4.4.1 By E-mail

Audit Committee

E-mail address : ac@mbkgroup.co.th

Chief Executive Officer

E-mail address : ceo-mbkgroup@mbkgroup.co.th

Chief Internal Audit Officer

E-mail address : ia@mbkgroup.co.th

4.4.2 By Mail to Aforementioned Individuals

MBK Public Company Limited

444 MBK Center 8th Floor, Phayathai Road, Wangmai, Pathumwan Bangkok

10330 Thailand

4.5 Related Person and Duty

4.5.1 The whistleblower or complainant can report a complaint through various channels such as the Audit Committee, Chief Executive Officer, Chief Operating Officer of Internal Audit Division, or other channels provided by the Company Group.

4.5.2 The complaint receiver must report the complaint to the internal complaint handler within 7 working days from the date of receiving the complaint.

4.5.3 The complaint handler must create a complaint control registration and forward the complaint to the relevant department to take action.

4.5.3.1 The complaint related to corruption or the matter that may lead to corruption must be sent to Internal Audit Department 1 and Internal Audit Department 2

for investigation. In addition, it must be sent to Discipline and Anti-Corruption Committee to investigate and report the findings to the Chief Executive Officer for acknowledgement.

4.5.3.2 The complaint unrelated to corruption or the matter that may not lead to corruption must be sent to Resources Department to take action according to the regulations and notify the investigation results the Chief Executive Officer.

4.5.3.3 The complaint control registration should contain information such as:

- Name of the whistleblower or complainant, unless it is anonymous
- Date of the complaint
- Name of the individual and/or incident being complained
- Other relevant information
- Date when the information was provided to the relevant person for action

4.5.4 The Discipline and Anti-Corruption Committee shall investigate the facts and issue orders.

4.5.4.1 If the investigation reveals that it is a case of corruption, the Human Resources Department should take action to discipline according to the Company Group's procedures and report the results to the Chief Executive Officer and the Audit Committee for further reporting to the Board of Directors.

4.5.4.2 In the case of a complaint from an anonymous person and no additional information can be obtained, the Discipline and Anti-Corruption Committee has the opinion to close the complaint. The person in charge of the complaint should report the results of the investigation the Chief Executive Officer and the supervisor of the accused person for information.

4.5.4.3 If the investigation results reveal that the accused person is not guilty, or the matter is a result of, and it is deemed appropriate to close the case without any penalties, the complaint handler inform the supervisor of the accused person as well as notify the whistleblower or the complainant. A report shall be submitted to the Chief Executive Officer.

4.5.5 If the truth cannot be found yet or the investigation by the Discipline and Anti-Corruption Committee is not yet completed, the complaint handler should update the summarized progress of the investigation to the Chief Executive Officer every 30 business days from the date of receiving the complaint.

4.5.6 The complaint handler and those involved must not have any personal interest in the complaint or be the subject of the complaint. If there is any involvement, the complaint receiver should consult with the Chief Executive Officer to consider actions.

4.5.7 If the Chief Executive Officer or Chief Operating Officer of Internal Audit Division has a stake in the complaint or is the subject of the complaint, the complaint receiver should consult with the Chairman of the Board or the Discipline and Anti-Corruption Committee to consider appropriate actions.

4.6 Conclusion Announcement to Complainant

The complaint handler shall inform the whistleblower or complainant of the results within 7 business days from the date of receiving the conclusion the investigation and summarize the

results in the complaint control registration.

5. Exception in Practice

None

6. Penalty

Anyone who intentionally or unintentionally violates or acts contrary to this policy, including behaviors such as bullying, threatening, disciplining, or using inappropriate methods, resulting from whistleblowing or complaints, to the whistleblower, complainant, or persons involved in the implementation of this policy shall be deemed to have violated discipline and shall be responsible for the damages caused to both the Company Group and those affected by such actions.

This policy has taken effect since February 1, 2023.

Announced on February 16, 2023

By the Resolution of the Board of Directors Meeting No.2/2023 on February 1, 2023

Wichak Praditavanij
(Mr. Wichak Praditavanij)
Chief Executive Officer