

Beryl 8 Plus Public Company Limited (Head Office) The 9th Tower Grand Rama 9 Building (Tower B), Floor 19, 33/4 Rama 9 Road, Huai Khwang, Bangkok 10310 Tel: 02-116-5081 Fax: 02-116-5082

# - Translation -

# Beryl 8 Plus Public Company Limited Whistleblower Policy

## (As approved by the Board of Directors' Meeting No. 5/2023 held on November 9, 2023)

Beryl 8 Plus Public Company Limited (the "Company") has established a whistleblower policy which protects and provide fairness to employees or stakeholders who report information or provide a trace of corruption or non-compliance with laws, rules, regulations, guidelines, policies, and the Company's business ethics. (collectively referred to as "offenses") which will be reviewed and/or revised annually by the Company Board of Directors.

#### <u>Scope</u>

This policy applies to the directors, executives, and all employees of the Company.

## **Whistleblowers**

- 1. Any employee who sees or witnesses the corruption or any actions that violate the laws, company regulations or business code of conduct.
- 2. Any employee who is bullied, threatened, or subject to unfair disciplinary penalties such as salary deduction, suspension, dismissal, or any discrimination relevant to employment conditions, which are the consequences from his action to complain, provide information, or promise to provide information or support in any investigations, collect data and facts for the complaint commissioner, make a prosecution, be a witness, give testimony, or cooperate with the court or any government officials.
- 3. External parties or stakeholders who suffer from or are victims of the corrupted or illegal acts committed by the Company directors, executives, or employees.

## **Complaint Commissioner**

1. Company's Audit Committee

## **Complaint Procedure**

- Whistleblowers can directly send their concerns of malpractice or corruption by specifying details of the matter to complain about or report a trace along with name, address, and telephone number that can be contacted through more than one channel to the Company's the Audit Committee via email to
  - <u>threekwan.b@beryl8.com</u>



- chatrapee.t@beryl8.com
- udomsakdi.a@beryl8.com

Or by submitting a postal letter to the Company's the Audit Committee.

- 2. Once received the complaints or trace of the malpractice and/or corruption, the investigation committee will proceed the investigative steps within 15 days.
- 3. Whistleblowers do not need to reveal their identity, unless revealing your identity will allow the Company to inform you of the results of operations or additional information on the complaint or the whistleblower must reveal their identity to the investigation committee and must specify adequate details, facts, evidence to make such complaints or malpractice reliable and trustworthy and to avoid the false information giving.

The Company will keep all the received information private.

#### **Investigation Procedure**

1. Once received the complaint or trace of malpractice and/or corruption, the investigation committee shall investigate and collect facts according to the raised concern. The investigation committee can assign subject matter experts to examine the facts more closely and gather relevant information.

In case there are further questions after the investigation session, investigation committee or their assignee may invite any of the employee or the immediate supervisor of the whistleblower to give more information or request for more relevant document as a supporting document/evidence for the case.

- 2. Once a decision has been made, the Company will proceed as follows;
  - (1) If the issue is relevant to the malpractice or violation of laws, company regulations, or code of conduct, the Investigation Committee will submit the issue together with their personal comments to the Audit Committee for further consideration.
  - (2) the Audit Committee shall update the progress and result of the investigation regarding the malpractice and/or the corruption to the whistleblower. However, there may be some necessary reasons such as the concern about identity or company's secret protection that make the investigation committee unable to disclose the details regarding the disciplinary investigation or penalty.
  - (3) In case the issue is critical, for example, the case sensitive to the Company's reputation, image, or financial status, or issue against the Company's business operation, or issue related to company executive, the Audit Committee will consider to submits it with their personal comments to the Company's Board of Directors for further consideration.



(4) If the case is the malpractice that causes damage to any person, the Investigation Committee may propose the damage relief that is suitable and fair to the injured person as seen appropriate.

#### **Whistleblower Protection**

- The Company will assure to keep all information confidential and will disclose only if necessary by considering the safety or damage of the whistleblower, source of information, or related persons. Recipients of complaints, auditors and the responsible person in every step of investigation will keep the information private as it pertains to the case without any exception. Failure to comply will be considered as a disciplinary offense.
- 2. Whistleblower can request the Company to develop measures to protect him as seen appropriate if the whistleblower feels insecure or may suffer from raising concern. Or the Company may set measures to protect the whistleblower without his request if it sees that such complaint can do any harm to the whistleblower.
- 3. The Company will not demote, punish or take any negative action against the whistleblower, and if the whistleblower believes that he or she is in danger or receiving any damage, the whistleblower can request that the Company establishes appropriate protection measures. The Company may specify protection measures without any request from the whistleblower, if the Company determines that the matter is likely to cause damage or insecurity.
- 4. The employee who treats others unfairly or inappropriately or create damage or harassment to others with the impression that the person raise the case, give evidence of the malpractice and/or corruption or violation against the law, rules, regulations, business code of conduct, make a prosecution, be a witness, give testimony, or cooperate with the court or any government officials, is considered committing disciplinary offense and subject to punishment by law.
- 5. Damage of the victim of such issue will be relieved by the suitable and fair method or procedure.

#### **Registration and Report**

The Secretary to the Audit Committee is responsible for registering complaints and/or trace about the malpractice and/or corruption and regularly making a report summarizing all malpractice and corruption, whether investigated or in the process of investigation, to the Audit Committee at least once a quarter.

The Whistleblower Policy shall be effective from November 9, 2023.



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(Mr. Chatchaval Jiaravanon) Chairman of the Board of Directors November 9, 2023