



## MUANGTHAI CAPITAL PUBLIC COMPANY LIMITED

332/1 Jaransanitwong Road, Bangplad, Bangkok Thailand 10700 Tel. +662 483 8888

### Whistleblowing Policy

Muangthai Capital Public Company Limited has established channels for complaints and whistleblowing related to illegal or unethical actions, violations of the anti-corruption policy, or behaviors that may lead to corruption or misconduct by individuals within the organization—including employees, executives, and stakeholders. The Company also has measures in place to protect the identity and information of whistleblowers and places great importance on maintaining the confidentiality of complaints to reassure and protect complainants.

#### Objective

1. To promote proper, transparent, fair, and auditable business conduct by executives and employees, consistent with good corporate governance principles and the Company's ethics. The Company expects personnel to honestly report on practices that may violate or appear to violate the aforementioned principles. Upon receiving such reports, the Company will rectify, adjust, or take corrective actions to ensure compliance that is appropriate, transparent, fair, and in accordance with Securities and Exchange Act of Thailand, which provide protection to whistleblowers who provide information honestly to regulators, a principle that the Company adheres to.
2. To ensure that supervisors and Human Resources Department of Muangthai Capital Public Company Limited fulfill their responsibilities of overseeing and providing guidance, as well as monitoring the behaviors, conduct, and actions of employees accurately, and whistleblowers will be protected if their actions are carried out with sincere integrity.

#### Channels for Complaint and Whistleblowing

1. Call Center (+66) 2-483-8888 or 1455
2. By E-mail : [whistleblower@muangthaicap.com](mailto:whistleblower@muangthaicap.com)
3. By filling a whistleblowing form on the Company's website
4. By post to the following address:  
Mrs. Kongkaew Piamduaytham  
Chairman of the Audit Committee  
Muangthai Capital Public Company Limited,  
332/1 Jaransanitwong Road, Bangplad, Bangkok 10700
5. Telephone to the Whistleblowing Department about fraud or corruption and incompliance with the policies and disciplines  
(+66) 81-751-1587
6. Use of personal information without consent from an owner. Whistleblowers can send the complaints to the Data Protection Officer (DPO) via  
E-mail : [dpo@muangthaicap.com](mailto:dpo@muangthaicap.com)



## MUANGTHAI CAPITAL PUBLIC COMPANY LIMITED

332/1 Jaransanitwong Road, Bangplad, Bangkok Thailand 10700 Tel. +662 483 8888

### **Scope of Whistleblowing or Complaints**

- **If there is a clue about the wrongdoing which meets the conditions in the following matters:**
  1. Illegal acts against policies/principles of good Corporate Governance or Code of Conduct.
  2. Behavior that may lead to fraud or misconduct to seek unlawful benefits for oneself and/or others such as corruption, embezzlement, fraud, etc.
  3. Violation of rules, regulations, the Company's Articles of Association.
  4. Exposure to unfairness in the performance of work or found a defective internal control system of the Company until it is suspected that it may be a channel for corruption or cause to suspect that it may be a channel for corruption or make the Company lose benefit.

### **Whistleblowing and Complaint Considerations and Terms**

1. The information received will be treated as confidential, and the whistleblower's identity will not be publicly disclosed without consent.
2. The details of the whistleblowing or complaints must be true, clear, and sufficient to facilitate an investigation into the facts for further action.
3. The response time to the whistleblower should not exceed three days after receiving the whistleblowing report.
4. The timeline for processing complaints depends on the complexity of the matter, the adequacy of documents, and the evidence received from the whistleblower, including documentary evidence and explanations. However, it will not exceed 30 business days.
5. Whistleblowers, whether employees or external parties, will be entitled to protection.
6. The complaint receiver and those involved in the investigation process must maintain confidentiality regarding relevant information, which will only be disclosed when necessary, considering the safety of the whistleblower, those cooperating in the investigation, or related persons.

### **Whistleblower and Complainant Protection Measures**

1. The Company will keep the information and identity of the whistleblower or complainant confidential.
2. The Company will disclose information only as necessary, considering the safety of the reporting person. Any damage to the source of information or involved individuals will be mitigated through appropriate and fair procedures.
3. The Company will not treat the whistleblower unfairly, including by changing their job position, job description, workplace, suspending, intimidating, interfering, laying off, or taking any other action that is unfair to the whistleblower or those who cooperate in the investigation.
4. In the event of complaints or for those cooperating in the investigation of facts, the individual may request that the Company implement appropriate protection measures. Alternatively, the



## MUANGTHAI CAPITAL PUBLIC COMPANY LIMITED

332/1 Jaransanitwong Road, Bangplad, Bangkok Thailand 10700 Tel. +662 483 8888

Company may impose protection measures on the complainant or individuals cooperating in the investigation if there is a risk of harm or insecurity, even without a request.

### Whistleblowing and Complaint Management Process

#### 1. Registration and transfer

The complaint coordinator registers whistleblowing and complaints, scheduling a date to inform the complainant of the progress, as follows:

- In cases where there is a hazardous impact on the Company's reputation, it must be managed as soon as possible.
- Other cases must be handled promptly. The complaint coordinator is responsible for receiving complaints and recording the complainant's information, including the following details:
  - 1) Name of the complainant, except for anonymous complaints
  - 2) Complaint date
  - 3) Name of the person or case involved
- Other relevant information when registering a complaint: The confidentiality level should be classified based on the content of the issue, and the following steps should be taken:
  - 1) Send the complaint to the complaint officer to investigate the facts and take action according to their authority.
  - 2) Send a copy of the complaint to the Human Resources Department for initial awareness, in order to prepare advice on disciplinary actions or other matters.
  - 3) Send a copy of the complaint to the Chairman of the Executive Committee and the Managing Director for their awareness.

#### 2. Fact gathering and instruction

- The complaint officer investigates the facts and provides recommendations to the concerned parties to ensure proper conduct and actions. If disciplinary action is required, the officer should consult with the Human Resources Department to ensure that the punishment aligns with the Company's regulations. If the complaint officer does not have the authority to impose punishment, the matter should be escalated to the appropriate authority step by step. The facts, actions taken, and any imposed punishment should then be sent to the Chairman of the Executive Committee and the Managing Director through the relevant supervisors for awareness or further action.
- If, after investigating the facts, the complaint officer finds that the accused party is not at fault, the matter was a misunderstanding, or recommendations have already been provided to the accused or related parties for appropriate conduct, and it is deemed that no punishment is necessary, the complaint officer should propose closing the matter to the immediate superior for



## MUANGTHAI CAPITAL PUBLIC COMPANY LIMITED

332/1 Jaransanitwong Road, Bangplad, Bangkok Thailand 10700 Tel. +662 483 8888

approval. A copy of the matter should also be sent to the complaint coordinator to notify the complainant.

- In the case of an anonymous complaint where insufficient information can be obtained, the complaint officer should submit a report on the investigation and their opinion on the complaint to the Chairman of the Executive Committee or the Managing Director through the relevant supervisors, seeking guidance on the appropriate course of action. If the Chairman or Managing Director deems that the complaint cannot be addressed, the matter will be closed, and the complaint officer should send a copy to the complaint coordinator for notification.

### 3. Fact investigation

- In cases where the complaint officer and the Human Resources Department determine that disciplinary action is necessary, the Human Resources Department shall present the matter to the Chairman of the Executive Committee and the Managing Director for further investigation of the facts.
- Once the Chairman of the Executive Committee and the Managing Director have issued their decision, the result should be communicated to the complaint officer to proceed with the next steps.

### 4. Result and improvement

- The complaint officer shall act according to the instructions of the Chairman of the Executive Committee and the Managing Director, providing recommendations for appropriate conduct and actions. The complaint officer should also notify the complaint coordinator of the results of the actions taken.
- The complaint coordinator shall inform the complainant of the results of the actions taken and record the outcome of the process related to the complaint. This information should be presented to the Executive Committee on a quarterly basis.
- The complaint coordinator shall follow up on the progress of any corrective actions (if applicable) and report the results to the Chairman of the Executive Committee and the Managing Director.

### **Complaints or Whistleblowing in Bad Faith**

If complaints or whistleblowing involve dishonesty or the intentional misrepresentation of facts, and the individual is an employee, appropriate disciplinary action will be taken. Furthermore, if an outsider engages in such misconduct and damages the Company's reputation, the Company will consider taking legal action. The supervisor is responsible for monitoring such matters. If the supervisor engages in misconduct or fails to comply with the whistleblowing policy, they will also be subject to disciplinary action.