



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 set a channel for complaints or whistleblowing from actions. Illegal or unethical or anti-corruption policies or behaviors that may lead to corruption or misconduct of individuals in the organization include employees, executives, and stakeholders including having a mechanism to protect information providers and attaching importance to keeping complaints confidential to reassure the complainants.

Objective

1. To promote proper, transparent, fair, and auditable business conduct by managers and employees, consistent with good corporate governance principles and the Company's ethics. The Company expects everyone to report honestly 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 Thai securities and capital market laws, which provide protection to whistleblowers who provide information honestly to regulatory agencies, a principle that the Company adheres to.
2. To ensure that the authorities and human resources department of Muangthai Capital Public Company Limited fulfill their responsibilities of overseeing and providing guidance, as well as monitoring the behavior, conduct, and actions of employees accurately, and whistleblowers will be protected if their actions are carried out with sincere integrity.

Scope of whistleblowing or complaints

When in doubt or seeing suspicious acts that violate the following good practices.

1. Violation of compliance with the principles and practices of the Good Corporate Governance Policy.
2. Violation of rules, regulations, company regulations.
3. Exposure to injustice in the performance of work.
4. Fraudulent acts, channels for whistleblowing or complaints.
 - 4.1 Send the letter by email
E-mail: whistleblower@muangthaicap.com
 - 4.2 Send the letter by postage
Mrs. Kongkaew Piamduaytham
Chairman of Audit Committee
Muangthai Capital Public Company Limited
332/1 Jaransanitwong Road, Bangplad, Bangkok 10700



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4.3 Telephone to the whistleblowing receiving department
081-751-1587

4.4 The use of personal information without consent from the owners, whistleblower can send the complaints to the Data Protection Officer (DPO) via
E-mail: DPO@muangthaicap.com

Conditions and consideration for clues or complaints

1. Information received will be treated as confidential and the name of the whistleblower or the complainant will not be disclosed to the public without consent.
2. Details of the clues or complaints It must be true, clear, or sufficient to investigate the facts for further proceedings.
3. The time for responding to the complainant should not exceed 3 days after receiving the complaint.
4. The time for processing the complaint depends on the complexity of the matter, the adequacy of documentary evidence received from the complainant including documentary evidence and explanations of the complainant, but no later than 30 business days.
5. Persons who report whistleblowers or complaints will be entitled to protection whether they are employees or third parties.
6. Complaints recipients and those involved in the investigation process relevant information must be kept confidential and will be disclosed to the extent necessary, taking into account the safety and damage of the complainant or the person who cooperates in the investigation or the source of the information or the person concerned.

Protection Measures for Whistleblowers or Complainants:

1. The Company will keep the information and identities of whistleblowers or complainants, as well as the accused, confidential.
2. The Company will disclose information only as necessary, considering the safety and damages to the reporter, the source of information, or involved individuals who have suffered harm. They will be relieved of harm through appropriate and fair processes.
3. The Company will not take any unfair actions against whistleblowers or complainants, including but not limited to changing positions, job descriptions, workplace locations, suspensions, threats, work disruptions, terminations, or any other actions that are unjust towards whistleblowers or complainants, or those cooperating in verifying facts.
4. In cases where complainants or those cooperating in verifying facts can request appropriate protection measures from the Company, or the company may establish protection measures without the need for a request if it is deemed likely to cause distress, harm, or insecurity.



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Process

1. Registration and Submission

Complaint Coordinator Register for complaints and set the date for notifying the progress of the complaint to the complainant as follows.

- Cases that seriously affect the reputation of the company To act as urgently as possible.
- In other cases, proceed as soon as the complaint coordinator receives it Record the information of the complainant as follows.
 1. Name of the complainant unless it is anonymous.
 2. Date of the complaint.
 3. Name, person, or incident complained.
- Other relevant information upon registering a complaint to determine the level of confidentiality according to the content of the story and proceed as follows.
 1. Send the complaint handler to investigate the facts and order according to the authority.
 2. Send a copy of the matter to the Human Resources Department to prepare for advice on disciplinary action or others.
 3. Send a copy of the matter to the Chairman of the executive committee and the managing director knows about it.

2. Gathering facts and giving orders

- The complainant investigates the facts and advises those involved in the conduct. If disciplinary action is required, consult with Human Resources. In order for the punishment to be in accordance with the company regulations and if the complainant does not have the power to order the punishment to be presented in a hierarchical order to the authorized person, as the case may be, and send facts the results of the action and the punishment order, as the case may be, will be sent to the CEO and the managing through the chain of command, for awareness or consideration of orders.
- If the complainant checks the facts and finds that the complainant was not guilty or is it caused by a misunderstanding or have given advice to the complainant or related persons to behave or act appropriately and consider that the matter should be closed without any penalties to the caretaker of complaints present the matter to the superiors above for approval to close the matter and provide a copy to the coordinator of the complaint to inform the complainant.
 - In the case of a complaint from an anonymous person and unable to find enough additional information have the complaint handler submit a report on the results of the investigation and comments on the complaint go to the chairman of the executive committee or managing director through the hierarchical supervisors to ask for appropriate



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operating guidelines If the chairman of the executive committee or the managing director sees that the complaint cannot be processed. The complaint will be closed and instruct the complaint handler to provide a copy to the complaint coordinator for notification.

3. Investigation of facts

- In the case of complaint handlers and the human resources department considers that disciplinary action will be required the human resources department proposes the matter to the chairman of the executive committee managing director to investigate the facts further.
- When there is an order from the executive chairman and managing director report the result to the complaint supervisor to proceed to the next step.

4. Notification of the summary results to the complainant and improvements.

- Complaint moderators Execute according to the orders of the Chairman of the Executive Committee and the Managing Director. provide advice on behavior or continue to take appropriate action and notify the result of the action complaint coordinator as well.
- Complaint coordinator. notify the result of the action to the complainant and record the results of the actions related to the complaint by presenting to the Executive Committee on a quarterly basis.
- Coordinating complaints. Follow up on improvements (if any) and report to the Chairman of the executive committee managing director informed.

Dishonest complaints or wrong channels

If the whistleblower, complaint, statement or any information that proved to be acting in bad faith or wrong channel. In the case of being an employee of the Company will be subject to disciplinary action but if it is a third party who does that causing damage to the Company, the Company will consider prosecuting such persons as well. Responsibilities of superior supervisors If the complainant neglects or does not comply with this policy the superiors above will also be subject to disciplinary action.