



Whistle-blow Policy	Reference number : SRMD 01/ 2024
	Review date : -
	Approval date : 30 July 2024
	(Executive Board Meeting No.4/2024)
	Effective date : 30 July 2024
	Supersede date : -

This policy provides a framework for all business operation under Berli Jucker Public Company Limited and BJC Group (hereinafter referred to as "BJC Group"). BJC group recognizes the importance of conducting business ethically, transparently, and fairly. It prioritizes creating a safe and open environment for all employees to report concerns about inappropriate or illegal actions.

This policy is established to ensure that all complaints are handled fairly, promptly, systematically, and confidentially, and for the following purposes:

- I. Promote Reporting of Misconduct: To enable employees at all levels to report misconduct, illegal activities, or violations of the company's Code of Business Conduct that may harm the company, such as corruption, human rights violations, and violations of laws and regulations.
- II. Ensure Thorough Investigation: To ensure that all complaints are thoroughly investigated in a confidential and fair manner by an independent and impartial team.
- III. Protect Whistleblowers: To protect and safeguard whistleblowers who report concerns in good faith from retaliation, punishment, or discrimination of any kind, such as protection from unfair dismissal, demotion, harassment, or intimidation.
- IV. Enhance Transparency and Accountability: To foster a corporate culture of transparency, accountability, and responsibility towards all stakeholders, including employees, customers, shareholders, and society.

Scope of Policy

This policy applies to the business operations of Berli Jucker Public Company Limited and its subsidiaries.

Definitions

- Whistleblower: An employee or any other person associated with the company who reports concerns about actions that may be illegal or violate the company's Code of Business Conduct, whether committed by employees, executives, or external parties.
- Wrongdoing: A violation of laws, policies, or the company's Code of Business Conduct, including corruption, fraud, theft, bribery, providing false information, harassment, or safety violations.



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- Retaliation: Any act of revenge, punishment, intimidation, or discrimination against a whistleblower due to their reporting of concerns in good faith.

Procedures

- 1) Reporting: Whistleblowers can submit reports through the following channels:
 - Online Channel: Through the company's online complaint reporting system at www.bjc.co.th > Investor Relations > Whistleblowing. Reports can be made 24/7, and whistleblowers can fill out an online form and attach supporting evidence.
 - Hotline: Call the direct line at 02-146-5999, the company's complaint hotline. Staff will be available to receive complaints and provide advice during business hours. Whistleblowers can choose whether or not to reveal their identity.
 - Email: Send an email to the dedicated complaint email address, Comsec@bjc.co.th. Supporting evidence such as documents, conversation records, or photos can be attached.
 - Mail: Send a letter detailing the complaint, along with evidence (if any), to the company's Human Resources Department or Company Secretary. The letter can be sent to the company's headquarters.

For employees, they can file a grievance and follow the grievance procedure as detailed in the Berli Jucker Public Company Limited Employee Handbook, effective from April 1, 2022, Section 6: Grievance.

- 2) Whistleblower Protection - The company has clear measures and procedures to protect whistleblowers who report concerns in good faith from any form of retaliation. This includes strict confidentiality of whistleblower information, which will not be disclosed without permission except as required by law. For employees, they can follow the grievance procedure as detailed in the Berli Jucker Public Company Limited Employee Handbook, effective from April 1, 2022, Section 6: Grievance.
- 3) Anonymity - The company provides a system to support anonymous reporting of complaints through various channels, such as the online reporting system and hotline. The company will maintain the confidentiality of the whistleblower and will not disclose any information that could identify them.
- 4) Investigation, Inquiry, and Consideration of Complaints – All complaints will be investigated systematically, thoroughly, and fairly by a fact-finding team and/or an investigation committee composed of experts from various fields. The



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committee will collect evidence, interview relevant parties, and analyze the data in detail to obtain accurate and complete facts. The investigation process will be conducted efficiently and appropriately.

In the case of serious disciplinary misconduct investigations, a fact-finding team and/or an investigation committee shall be appointed and operate in accordance with the Berli Jucker Public Company Limited Procedure No. HRD-21-053/22 on Serious Disciplinary Misconduct Investigation and Appointment of Investigation Committee, effective from October 1, 2022.

- 5) Penalties – The company may take legal action against offenders who are found to have committed offenses under the law. In the case of employees whose investigations reveal misconduct, the company will take appropriate disciplinary action against those involved, in accordance with the grievance procedure as detailed in the Berli Jucker Public Company Limited Employee Handbook, effective from April 1, 2022, Section 6: Grievance.
- 6) Reporting of Investigation Results - After the investigation is completed, the committee will prepare a summary report of the investigation results and submit it to the management/relevant parties for consideration and appropriate action.
- 7) Review and Improvement - The company will regularly review and update this employee complaint policy to ensure compliance with laws and best practices, and to ensure that the policy is effective in promoting a transparent and accountable corporate culture.