

## **Whistle Blower Policy**

BlueVenture Group Public Company Limited (“**Company**”) and its affiliated companies place importance on corporate governance in accordance with business ethics and code of conduct and oversees that the Company has a good corporate governance policy, an internal control policy, a policy and measures against corruption, and other relevant, effective, and efficient policies and regulations. The directly responsible supervisory department is the human resources department, with management providing support, supervision, and serving as a good role model in complying with the Company's policy, as well as overseeing, advising, and treating employees or whistleblowers with fairness, whether they are external persons, to ensure that employees carry out their duties with honesty and integrity, conduct business transparently, and without any misconduct, corruption, or violation of any rights that occur within the Company.

If employees, external persons, or stakeholders are treated or notice behavior contrary to the Company's committed policy as mentioned in the first paragraph, the Company has determined a policy for handling complaints, exposing misconduct, and protecting whistleblowers as follows:

1. The Company has arranged for secure and easily accessible channels, including Whistle Blowing System, for employees, external persons, or stakeholders to complain about the damage they have suffered, express concerns/report suspicious situations, and inform of any related misconduct with the Company, as well as seek advice on compliance with business ethics and related policies. All reported information is confidential, and whistleblowers and those cooperating with the Company in fact-finding will be protected from punishment and will not be negatively affected by complaints or whistleblowing.
2. The Company has arranged for adequate and effective measures, rules, guidelines, and practices in accordance with the policy, and communicated to employees, external persons, and all stakeholders to be aware of and act appropriately.
3. Directors, management, and all employees must not neglect or ignore when witnessing misconduct related to the Company and its affiliate companies and must report it through the channels that the Company has set up and cooperate in fact-finding.

### **Objectives**

1. To enable the directors, management, and all employees of the Company, as well as all stakeholders, to complain or whistle blow on corruption, violation of any rights that occur within the Company, including violation of laws, rules, regulations, business ethics, and code of conduct.
2. To specify a confidential channel for complaints and whistleblowing on misconduct and corruption to give confidence to whistleblowers, as well as to determine measures to protect those who complain or whistleblower.
3. To prevent, reduce, or mitigate any damage that may occur within the Company promptly.
4. To enhance the image and comply with good corporate governance.

### **Scope of enforcement:**

1. This policy is enforced upon the directors the management, and all employees within the Company.
2. This policy covers actions and corruption that may occur within the Company, whether evident or suspected, involving shareholders, the directors, management, employees, and all stakeholders who have business relationships with the Company.

### **Definitions**

**“Misconduct”** refers to fraud, corruption, embezzlement, violation of laws, rules and regulations imposed by external regulators and/or violations of business ethics and code of conduct, policies, measures, regulations, procedures set by the Company.

**“Fraud”** refers to actions or omissions intended to gain undue or illegal benefits for oneself or others, either directly or indirectly. Fraudulent behaviors can be categorized into 3 types as follows:

1. “Corruption” is the act of offering, requesting, or accepting money, goods, or any other benefits to/from government entities, government officials, private companies, or private company officials. This is done to induce an action or inaction, or to influence improper actions against their duties. The intention behind such acts is to gain unfair competitive advantages or to obtain benefits illegally. This might include Bribery, Conflict of Interest, Economic Extortion, and Procurement.
2. “Asset Misappropriation” is the use of company assets for personal gain. This includes Theft of Cash/Inventory/Other Assets, Fraudulent Disbursements, and Misuse of assets.
3. “Financial Statement Fraud” is the act of overstatement or understatement. This involves hiding or distorting information in notes to financial statement (Information Asymmetry).

**“Deceit”** refers to actions or omissions done fraudulently and with an intention to deceive, in order to gain benefits which one should not legally obtain, for oneself or others. Regardless of whether the beneficiary of deceit is the perpetrator or someone else, it can include providing false statements, concealing the truth, or hiding information that should be disclosed.

**“Complaint recipient”** refers to the Secretary of the Audit Committee.

**“Complainant”** refers to the directors, management, or employees of the Company, as well as all parties who file a complaint with honest intention when witnessing acts that violate laws, regulations, business ethics and code of conduct, or any form of corruption within the Company.

**“Respondent”** refers to the directors, management, or employees who have been complained about or accused of wrongful acts, business ethics and code of conduct, work regulations, various rules, and related laws concerning the Company's business.

**Guidelines for the implementation of the policy on complaint handling/whistleblowing, and protection of whistleblower:**

**1. Criteria for complaints/whistleblowing to be considered for response and management**

The company should take care of and respond to the information reported in order of importance in compliance with laws, regulations, and good governance principles. The criteria for complaints that the Company will consider under this policy are as follows:

- (1) Complaints about violations of good governance principles or business ethics and code of conduct, including corruption.
- (2) Complaints or information that may be beneficial in investigating fraud, deception, or illegal acts, whether internal and committed by the directors, executives, or company employees, or external parties and committed by customers or other stakeholders, which may cause damage or loss of benefits that the company is entitled to.
- (3) Complaints concerning laws, standards, and various regulations that the Company must comply with.
- (4) Complaints concerning the Company's operational policies and accounting and financial policies that have been set.
- (5) Complaints about items related to conflict of interest or connected transaction with the Company under the regulations of the Securities and Exchange Commission or the Stock Exchange of Thailand.
- (6) Complaints about the financial statements and performance of the Company arising from improper actions or financial report manipulation.
- (7) Other complaints as additionally defined by the Company's Board of Directors or Audit Committee.

**5. Confidentiality and Protection of Whistleblowers**

- (1) The Company provides protection for the rights of complainants and whistleblowers acting with honest intent, whether they are internal personnel or external persons, such as journalists, stakeholders, investors, or supervisory agency. The protection includes fairness to the whistleblower, not allowing negative impact, concealing names, addresses, or any other information, and prohibiting disclosure to unrelated parties unless legally ordered by a court or supervisory agency.

- (2) Company employees who perform their duties with honesty, transparency, refuse corruption, and comply with company policies will be protected from punishment, termination, demotion, alteration of job responsibilities, suspension, harassment, or any disturbance in their work, even if such actions result in a loss of business opportunities for the Company.
- (3) Executives or employees of the Company are prohibited from terminating, suspending, taking disciplinary actions, or threatening any actions due to the employee's complaint or whistleblowing. Anyone committing such actions will be subject to disciplinary action.
- (4) Complainants or whistleblowers who are treated unfairly or subject to actions under item 5(3) may file complaints through the specified complaint channels.

## **6. Roles and Responsibilities**

### **6.1 Company Board of Directors/Audit Committee/Management**

- (1) Review the Company's policies for handling complaints/whistleblowing and protecting whistleblowers, as well as supervising the Company's appropriate and effective compliance with such policies.

### **6.2 Secretary of the Audit Committee**

- (1) Manage the channels for receiving complaints and whistleblowing and provide consultations on policies and practices.
- (2) Receive complaints and whistleblowing, screen and select them for further action.
- (3) Supervise to ensure that all complaints that meet the criteria and have sufficient information receive consideration, response, and management according to this policy.
- (4) Notify the complainants or whistleblowers of the progress of actions to demonstrate that the information received has been given importance.
- (5) Report the results of activities according to the policy to the Audit Committee.

### **6.3 Investigating Agency**

- (1) The investigating agency is an agency with the knowledge and ability to analyze complaints of various types, such as Human Resources Department, Compliance Department, Internal Audit Department, or persons or group of persons assigned by the Chairman of the Audit Committee or the Company's Board of Directors, to serve as investigators, depending on the case, and must be independent from the activities being investigated.
- (2) Conduct factual investigations, prepare investigation reports, and propose penalties (if any) to the Secretary of the Audit Committee, and then report to the Chairman of the Audit Committee for consideration of punishment and report to the next Audit Committee meeting.

## **7. Registration and Reporting**

### **7.1 Registration**

The Secretary of the Audit Committee holds the responsibility to create and maintain a registration of complaints, indications of misconduct, and to prepare a summary report of all allegations of misconduct within the Company. This includes those already considered and those pending investigation, ensuring that the Audit Committee is informed.

### **7.2 Reporting**

#### **(1) Complaints Concerning Corruption, Fraud, and Corruption**

The result of the investigation and any subsequent actions must be promptly reported to the Chairman of the Audit Committee upon the investigation's conclusion. Should any events or actions severely impact the financial position, operation, or reputation of the Company, the Audit Committee must relay a report to the management or the Company's Board of Directors, stipulating appropriate, timely remedies without unnecessary delays. Should the management or the Company's Board of Directors fail to implement improvements within the designated time, the Audit Committee member is obliged to notify the pertinent supervisory agency..

#### **(2) Other Complaints beyond Item 7.2 (1)**

A summarized report of received complaints and indication of misconduct must be submitted to the Audit Committee on an annual basis.

## **8. Review of the policy**

The company will propose to the Board of directors' meeting for a review of the policy annually.