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Whistleblowing Policy and Guideline

(นโยบายและแนวปฏิบัติการแจ้งเบาะแสและรับข้อร้องเรียน)



Whistleblowing Policy and Guideline

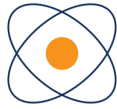
Policy and Guidelines

The Company has established a policy and guidelines for reporting a tip-off/clue, which includes measures for the protection and fair treatment of employees, directors, and other persons who report information or tip-offs/clues regarding corruption or non-compliance with laws, rules, and regulations of the Company, in order to ensure effective correction and improvement.

Things that Should Be Reported

Events indicating a possibility of being related to:

1. **Corruption** such as bribery, conflict of interest or business opportunity position, nepotism, unlawful gifts or monetary rewards, abuse of power, deception/fraud, negligence, or other forms of corruption in duty.
2. **Misappropriation of Assets** such as theft of money or assets, unauthorized use of the Company's money, assets, or facilities, or use for personal purposes.
3. **Reporting Fraud** such as financial statement fraud, disclosure fraud, performance evaluation fraud.
4. **Unlawful Acts** including political involvement and other harmful acts.
5. **Acts that violate the Company's regulations** such as failure to comply with established operating standards, unauthorized disclosure of Company information through any channel, and acts contrary to the criteria regarding the qualifications and abilities of the Board of Directors according to the Fit and Proper Policy for Board of Directors.
6. **Workplace Misconduct** such as inappropriate behavior at work, acts that do not meet professional standards, negligence, acts that pose safety risks to assets, facilities, personnel, and related parties.
7. **Threatening or Harassing** directors, executives, employees, or parties related to the Company.
8. **Concealing the aforementioned information.**



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Things that Should NOT Be Reported

1. False information without reasonable grounds.
2. Slanderous or libelous information.
3. Information lacking sufficient criteria and evidence.

Persons Entitled to Complain/Report

1. Employees and/or persons who witness acts that violate laws, regulations, Company rules, or the Company's Code of Ethics.
2. Personnel who are harassed, intimidated, subject to disciplinary action such as salary reduction, suspension, termination, or unjustly discriminated against in connection with their employment conditions, as a result of complaining, providing, or intending to provide information, assisting in the investigation process, or gathering facts for the complaint recipient, including litigation, acting as a witness, giving testimony, or cooperating with any court or government agency.
3. In the event that the complainant chooses to remain anonymous, sufficient clear factual details or evidence must be provided to indicate a reasonable belief that an act violating laws, Company regulations, Company rules, or the Company's business ethics has occurred.

Information for Reporting a Tip-off/Clue

1. Type of irregular act.
2. Relevant documents or evidence.
3. Names of involved persons.
4. Date, time, and location.
5. Method of the act.
6. Potential witnesses (if any).



Complaint Recipients

1. Supervisors whom you trust at all levels.
2. Company Secretary or Internal Audit Department.
3. Chairman of the Audit Committee or Chairman of the Board.

Reporting Channels

Complaints can be made to any of the complaint recipients through the following methods:

1. Direct verbal or written complaint.
2. By mail.
3. Via the E-Mail Address of the complaint recipient.
4. Via the Company's Website page "Contact Us" > "Submit Complaint".

The complaint will be treated with utmost confidentiality, and the complainant can report through more than one channel and does not need to disclose their identity. If the complainant chooses to disclose their identity, the Company will be able to inform them of the results of the action or additional details regarding the complaint.

E-Mail Address of Complaint Recipients

1. Mr. Chatchaval Jiaravanon, Chairman of the Board
E-Mail: chatchaval.jiaravanon@astratresury.com
2. Mrs. Pornpring Suksantisuwan, Chairman of the Audit Committee
E-Mail: pornpring.suksantisuwan@astratresury.com
3. Miss Pakamon Kitiratchatakul, Company Secretary
E-Mail: comsec@astratresury.com

Company Address

Company Secretary's Office (Please specify as Confidential Document)

ASTRA Enterprise Public Company Limited, No. 15 Soi Phatthanakan 56, Suan Luang Subdistrict, Suan Luang District, Bangkok 10250.

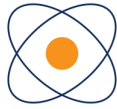


Fact-Finding Procedure

1. The complaint recipient will forward the matter to the Whistleblowing Review Working Group, which is appointed by the Chief Executive Officer on a case-by-case basis, and must consist of at least the Internal Audit Department, Legal Department, and Human Resources Department to conduct the investigation and gather facts.
2. The Whistleblowing Review Working Group has the authority to invite any employee to provide information or request the submission of any relevant documents for fact-finding.
3. If the investigation finds the matter to be true, the Company will proceed as follows:
 1. In the event that the complaint involves the Company violating laws, regulations, rules, or the Company's Code of Ethics, the matter, along with an opinion and a guideline for the correct course of action, will be submitted to the authorized personnel in the Company for consideration and action. In important cases, such as those affecting the Company's reputation, image, or financial status, conflicting with the Company's business policy, or involving senior management, the matter shall be submitted to the Audit Committee or the Board of Directors for consideration.
 2. In the event that the complaint causes damage to any person, appropriate and fair methods of damage relief will be proposed to the injured party.

Protection of the Person Reporting Information

1. The complainant can choose to remain anonymous if they believe disclosure may cause harm to themselves, but must provide sufficient clear factual details or evidence to indicate a reasonable belief that an act violating laws, Company regulations, Company rules, or the Company's business ethics has occurred. However, choosing to disclose one's identity will allow the complaint recipient to proceed more quickly.
2. The related information is considered confidential by the Company and will only be disclosed as necessary, taking into account the safety and harm to the reporter, the source of the information, or involved persons. Furthermore, those responsible at every step must keep the information they become aware of at the highest level of confidentiality and must not disclose it to others. Violation is considered a disciplinary offense.



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3. If the complainant believes they may be unsafe or may suffer distress or damage, the complainant may request the Company to establish appropriate protection measures, or the Company may establish protection measures without the complainant's request if it is deemed likely to result in harm or unsafety.
 4. Personnel who treat others unfairly, discriminate inappropriately, or cause harm to others, with the motivation stemming from the fact that the other person complained, reported information or a tip-off/clue regarding corruption or non-compliance with laws, regulations, rules, or the Company's business ethics, including the other person's action of suing, acting as a witness, giving testimony, or cooperating with any court or government agency, shall be considered a disciplinary offense subject to penalty. This may include penalties as stipulated by law if the act is considered a legal offense.
 5. The person who suffers distress or damage will receive relief through appropriate and fair methods or processes.
 6. Any person who retaliates against or harasses the whistleblower will be appropriately acted upon, including legal prosecution.

Reporting on Whistleblowing

1. The Company regularly reports a summary of actions taken on all complaints, including the progress of the operation, to the Audit Committee.
2. The Company discloses the results of whistleblowing activities in the annual Business Ethics Compliance Report, namely the number of whistleblowing cases, the number of cases found to be actual violations, and the method of imposing penalties.

Mr. Chatchaval Jiaravanon
Chairman of ASTRA Enterprise
Public Company Limited