

Whistleblowing Policy (Amendment Year 2024)

Sri Trang Agro-Industry Public Company Limited and its subsidiaries (“Sri Trang group” or “the Company group”) is committed to conducting its business with transparency, integrity and accountability in accordance with the principle of good corporate governance. It expects all stakeholders to report incidents which could be in breach of such principles to allow necessary correction of the breach.

Sri Trang group provides channel through which all groups of stakeholders regarding invalid or inappropriate action which may cause the damage to the Company group as well as any violation of the law, rules and regulations of the Company group, the Code of Conduct, including any financial misreporting and deficiency in internal control system. The report to the Company shall be made based on facts without any unsubstantiated accusation. The Company also provides protection for whistleblowers who act in good faith. Such measure aligns with the UN Guiding Principles on Business and Human Rights (UNGPs), which address the principles of Protect, Respect, and Remedy concerning business activities and human rights.

Appellant and Scope of Whistleblowing

All executives, employees and other stakeholders of Sri Trang group may report any incidents that are witnessed, aware, or reasonably believed to have violated or breached policies, rules and regulations, the laws, the principle of good corporate governance, the Code of Conduct or such other regulations of the Company group causing damage to both property and reputation of the Company group. Employees or officers of the Company group witnessing or being aware of the incidents are advised to first consult with their supervisor. Otherwise, the matter may be addressed to the work unit that is directly responsible for the matter, or to the Company Secretary as appropriate.

Protection for Whistleblowers, Witnesses and Related Persons

To protect whistleblowers who act in good faith, the Company group by persons performing duties in relation to the complaints will keep confidential the information about the whistleblowers and persons giving information. Whistleblowers will have appropriate protections, i.e. there will be no change to nature of work, work location, positions held. Nor will there be threatening, termination of employment or such other unfair practices against the whistleblowers until steps are completed in accordance with this policy even if such action will cause the Company group to lose its business opportunity.

Persons being informed of the complaints, or the information thereof will keep such complaints and information confidential and undisclosed to others unless it is required to be disclosed under the law. If there is any intentional disclosure of information, the Company group will impose sanctions in accordance with the regulations of the Company group and/or commence legal proceedings, as the case may be.



Channels for Whistleblowing

The Whistleblowing can be reached through these following channels.

1. By postage or by hand
Contact Person: The Company Secretary
Address: 17th floor, Park Ventures Ecoplex, Unit 1701, 1707-1712
No. 57 Wireless Road, Lumpini Sub-district, Pathumwan District, Bangkok 10330
2. Telephone or Email
Contact Person: The Company Secretary
Telephone no: +66 2207 4590
Email address: corporatesecretary@sritranggroup.com
3. By directly report to the units responsible for that issue.

Related Persons

Persons involved in the whistleblowing process include:

1. Whistleblowers including those who make reports via whistleblowing channels provided by the Company group;
2. Whistleblowing Coordinators including the Company Secretary who are responsible for the admission of the matters and first point of data collection including summary of results of the procedure and for the reporting of results of the complaint handling and sanctions to the whistleblowers in case where identity is disclosed. Copy of whistleblowing matters that are reported directly to the responsible work unit shall always be made available to the Company Secretary.
3. Whistleblowing Monitor including the Human Resources Department and/or direct supervisor of the persons against whom the whistleblowing reports are made;
4. Persons in charge of disciplinary matters including Human Resources Department;
5. Chief Executive Officer who is the top-level executive of the Company group.

Procedures

1. Admission of complaints and notification of schedules of complaints handling to the whistleblowers
Whistleblowing Coordinators are required to register any complaints received by specifying name of whistleblowers, date, persons and incidents which are the subject matter of the complaint including relevant information and the schedule within which the progress of complaint handling will be notified to the whistleblowers. Any incidents that could have a materially adverse impact on the reputation of the Company group shall be handled immediately while other cases of complaints may be handled quickly. Whistleblowing Coordinators shall then forward the complaints to the Whistleblowing Monitor for fact finding and for other steps to be taken in accordance with their powers and duties.

2. Fact finding and procedures

Whistleblowing Monitors or supervisors of the persons who are the subject of the complaints shall proceed with fact finding to substantiate the complaints. If it is found that the matter of the complaints is true and to have caused damage to the Company group, the Whistleblowing Monitors shall advise related persons on the appropriate behaviors or practices. Any acts that amount to a disciplinary breach will be reported to the Human Resources Department for further actions in accordance with the rules and regulations of the Company group. Information on fact finding, actions taken or sanctions that are imposed will be forwarded to each level of supervisor until the Chief Executive Officer for acknowledgement or further actions.

3. Closure of procedures

If the subject of the complaints did not commit the breach as accused in the complaint, the procedure shall be closed. The Whistleblowing Monitor shall propose to the immediate supervisor of the subject of complaints to request for closure of procedures and to submit copy of the matter to the relevant Whistleblowing Coordinator for acknowledgement.

4. Notification of results and summary of complaints

Whistleblowing Coordinators shall notify the whistleblower of the results and prepare a summary report on the details of actions taken in relation to the complaints for submission to the Audit Committee on a quarterly basis. The same summary report shall also be included in the report on corporate governance of the Company group.

5. Good faith whistleblowing

Any false complaints or report of information that are found to be made in bad faith shall subject the relevant whistleblower who are either executives or employees of the Company group to disciplinary actions in accordance with the rules and regulations of the Company group. Third parties who have made the false complaints or report of information in bad faith causing damage to the Company group may be subject to legal actions.

6. Failure to comply with the policy

If the Whistleblowing Monitors neglects or fails to comply with this policy shall be subject to disciplinary actions.

The Whistleblowing Policy shall apply to the subsidiaries. The Board of Directors considered and approved the amendment of this policy in the Board of Directors' meeting No. 4/2024, which was held on 18 July 2024. The policy shall come into force as from 18 July 2024.

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(Dr. Viyavood Sincharoenkul)

Chairman

Sri Trang Agro-Industry Public Company Limited