

(Unofficial Translation)

**Policy Announcement of Thai Private Sector Collective Action Against Corruption**

**No. 05/2561**

**on Whistleblower Policy**

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**Objectives**

The Company focuses on conducting business transparently and fairly in compliance with Good Corporate Governance and Business Ethics, therefore, the whistleblower policy is set up as the channel for complaining or whistleblowing about actions that against or non-comply with laws, Business Ethics, the Company's policies and regulations as well as the actions that lead to corruption of directors, executives and employees.

**Scope of Complaint and Whistleblowing**

The Company's employees at all levels or outsiders when finding the incidents which could believe in good faith that violate or non-comply with laws, Good Corporate Governance, Business Ethics, the Company's policies and regulations or the actions that lead to corruption, they can raise a complaint through channels provided as follows;

● **For Internal Whistleblowing**

Channel 1

**Internal Audit Department**  
G J Steel Public Company Limited  
88 PASO Tower, 24<sup>th</sup> Floor, 88 Silom Road, Suriyawong,  
Bangrak, Bangkok 10500  
Tel.: 02-634-2222 Ext. 5655 and 5659  
email : IA@gjsteel.co.th

## Channel 2

### **Human Resources and Administration Department**

Tel.: 038-345-950 Ext. 1320

email : HR@gjsteel.co.th

Complaint box located at the entrance of the factory and head office

- **For External Whistleblowing**

### **Compliance Department**

G J Steel Public Company Limited

*88 PASO Tower, 24<sup>th</sup> Floor, 88 Silom Road, Suriyawong,*

*Bangrak, Bangkok 10500*

Tel.: 02-634-2222 Ext. 5151 and 1559

email : compliance@gjsteel.co.th

### **Protecting the whistleblower and Confidentiality**

In order to protect the rights of complainant or whistleblower who raise a complaint in good faith without intent to slander or cause damage to a person or company, the Company will provide appropriate and fair protection, for example; there is no changing or degradation on position, job description or workplace, work suspension, harassment, interference, termination or any unfair actions to the whistleblower. The Company will not reveal identity of the whistleblower and will treat all information in confidence only accessible for those who have a responsibility to investigate complaint, except for appropriate disclosure in accordance with the laws. If there is an intentional breach of information disclosure, the Company will proceed with penalties according to the Company's regulations or the laws.

This rights protection is covering the employees who refuse corruption, even though that act will make the Company lose its business opportunities.

### **Untrue Allegations**

In case that the reported complaint has been proven to be intentional misrepresentation of facts or insulting others, the whistleblower who raise the complaint has violated the Company's ethics and will be penalized in accordance with the Company's regulations or the relevant laws except that the whistleblower has made an allegation in good faith.

## **Investigative Procedures**

To ensure that the investigative procedures have been processed appropriately with the reported complaint, the complaint recipient shall manage as follows;

1. The complaint recipient must report the complaint together with the document received from complaint channels to the company secretary immediately in order to gather and register the occurred complaint to follow the progress of the investigation. The company secretary reports to the investigation committee for investigating facts.
2. The investigation committee considers the complaint. If it is reasonable to believe it to be true, the procedures shall be done as follows;
  - For the complaint of violation or non-compliance with the Company's policies or regulations, it should be filed to the human resource manager as the complaint recipient for investigation.
  - For the complaint of violation or non-compliance with the laws, Good Corporate Governance, Business Ethics, and the act that leads to corruption, the investigation committee should find additional evidence for investigation.
  - For the complaint which is not reasonable to believe, the report considering the termination of the investigation should be submitted to the company secretary for progress conclusion and close the complaint.
3. The investigation committee investigates the true with justice, does not reveal information to unrelated person and concludes the investigation, corrective measures, including penalties according to the Company's regulations and as required by laws.
4. The investigation committee reports the investigation result to the Chief Executive Officer for acknowledgement or consideration. The Chief Executive's decision is final.
5. The investigation committee reports the investigation result with the decision from the Chief Executive Officer to the company secretary for progress conclusion and close the complaint.
6. The company secretary records complaints and investigation results and reports to the audit committee and the Board of Directors quarterly.
7. In case that the investigation committee requires to find an expert to join the investigation, the Company may consider to hire an expert with appropriate qualifications to join the investigation.

8. The Company must provide training to personnel who take a position of the investigation committee at least once a year to ensure that such personnel clearly understand the investigation process and have abilities proceed the investigation appropriately and fairly.

This policy is effective as of 15 August 2018 onwards.

Yours sincerely,

- *Signature* -

(Ms. Soontareeya Wongsirikul)

Thai Private Sector Collective Action

Against Corruption Director