

## **12. Complaints and Whistleblowing Policy**

The Company has a policy to listen to opinions, suggestions, questions or complaints related to corporate governance or supervision of operations from all stakeholders, whether from personnel within the organization or third parties. The Company pledges to consider any comments, suggestions, questions or complaints with transparency, honesty and equality as well as to maintain confidentiality, protect and provide measures to protect honest complainants, witnesses involved in complaints both during the investigation and after the investigation of the complaint.

### **12.1 Objectives**

- (1) To make the Company's operations more efficient in accordance with the principles of good corporate governance and effective corporate governance.
- (2) To emphasize the importance of listening, receiving complaints from personnel within the organization or from outside personnel, which is considered as one of the Company tools in surveillance, follow up or to inspect the business operations of Royal Plus Public Company Limited.
- (3) To prevent risks and increase the efficiency of the early warning system mechanism, which will lead to the prevention of damage that may occur to the stakeholders and to improve the efficiency of the Company's operations to be more efficient.

### **12.2 Definitions**

Complainant means a person or group of persons, directors, executives, employees of the Company, including all groups of stakeholders of the Company who report complaints in good faith when they see actions that violate laws, rules, regulations, and the Company's Articles of Association or the Code of Business Conduct or any fraudulent activities of the Company

Complaint recipient means the Chairman of the Audit Committee.

### **12.3 Scope of complaint**

Complainants can file a complaint or report a whistle through the complaint channels when they have questions or see actions that violate good practice in the following matters.

- (1) Corrupt actions directly or indirectly related to the Company, such as seeing personnel in the organization bribing / accepting bribes from government officials, state enterprises or private entities.
- (2) Violation of the rules, regulations of the Company causing doubts that it may be a channel or an opportunity for fraud.
- (3) Actions that cause the Company to lose benefits, affect the reputation of the Company.
- (4) Acts that are illegal, immoral or unethical.
- (5) Violation of compliance with the principles and practices of the Good Corporate Governance Policy and Anti-Corruption Policy.

- (6) Unfairness in work

#### **12.4 Complaint Channel**

- (1) Notify via the complaints system on the website of the Company. The system for receiving complaints is organized within the complaints and whistleblowing policy.
- (2) Send an email to the complaint recipient [chairman.ac@royalplus.co.th](mailto:chairman.ac@royalplus.co.th)

The complainant should provide details of facts or evidence that are clear enough to show that there are reasonable grounds to believe that there has been an act in violation of the law, rules, regulations of the Company, policies or the Company's Code of Business Conduct.

#### **12.5 Process**

- (1) Upon receiving a complaint, the complaint recipient will conduct an investigation and gather facts or may assign a trusted person or entity to be an investigator.
  - (2) Complaint recipients or assignees can invite employees who are suspected or involved in the complaint to provide information or request the submission of any relevant documents for investigation.
  - (3) If it is found to be true, the Company will proceed as follows.
    - 3.1) In case that the complaint is about illegal actions, rules, regulations, policies or the Company's Code of Conduct, complaint recipient will present the matter with opinions and guidelines for action to the Company's authority, the Audit Committee or the Board of Directors for consideration.
    - 3.2) In case of an important issue such as an issue that affects the reputation, image or financial position of the Company or conflicts with the Company's business policies or involves senior management, etc., the complaint recipient shall submit such matter to the Audit Committee or the Board of Directors for consideration.
    - 3.3) In the event that a complaint causes damage to any person, it will give opinions and guidelines for mitigating the damage that are appropriate and fair to the injured person and propose to the authorized person, the Audit Committee or the Board of Directors for consideration.
  - (4) If the investigation of the facts reveals that the information or evidence has reasonable grounds to believe that the alleged offender actually committed the crime, the Company shall give the accused person the right to be informed of allegations and the right to prove himself by seeking additional information or evidence showing that he/she is not involved in the alleged fraudulent actions.
  - (5) If the accused person has actually committed an offense and such offense is considered an offense under the Anti-Corruption Policy, he/she shall be subject to disciplinary action in accordance with the regulations set by the Company and if the fraudulent act is against the law, the offender must be punished by law.

(6) The Company will inform the progress and results of consideration of complaints or wrongdoing or fraud to the complainant who has disclosed his name, address, telephone number and e-mail address through the contact channels provided or the complainant can track the progress through tracking channels provided by the



**ROYAL PLUS**

## **Royal Plus Public Company Limited**

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Company. However, if there is a need for personal information and confidentiality, the Company may not be able to provide detailed information about an investigation or disciplinary action.

### **12.6 Measures to protect complainant**

(1) The Company will protect complainants and informants to the best of their ability without disclosing any personally identifiable information and keeping the information confidential. Access to the information is restricted to only those responsible for investigating the complaint.

(2) The Company will disclose information as necessary, taking into account the rights of privacy, safety of the information providers, data sources and related parties as a priority.

(3) Complainants, informants, resources and persons involved are entitled to compensation, mitigation through appropriate and fair protection procedures.

(4) The person receiving the complaint and person involved in the investigation process is obliged to keep the complaint details and all relevant documentary evidence confidential. It is strictly forbidden to disclose information to any person who does not have a relevant duty, except for disclosure in accordance with legal obligations.

### **12.7 False complaint**

Complainants are well aware and understand that complaints must be made in good faith, without intent to harass an organization or person or with dishonest, unfair intentions. If the complainant makes a false, unfounded claim or intentionally libels an organization or person, the Group will proceed according to the procedures of the Company or the law relating to the Complainant as appropriate, as the case may be.