



Policy of PTT MCC Biochem Company Limited

No. ๐๐๒/ 2021

On Whistleblower Policy

PTT MCC Biochem Company Limited (“The Company”) has a policy and strives to listen to complaints from all stakeholders either within or outside the organization in relation to good corporate governance and business code of conduct, corporate compliance, corruption or fraud reporting.

The Company commits to processing complaints with transparency, honesty and fairness equally including keep personal information confidential and provides measures to protect the sincere complainants and relevant witnesses. This is to ensure that the Company’s will have an effective operation and conform with the principles of compliance policy and Anti-Corruption Guidance also to prevent risks and increase the effectiveness of the early warning mechanism for safeguarding against damage that may occur to the Company and stakeholders. The Company has established the whistleblowing framework as following and the previous Company’s policy no. 002/2021 on Whistleblower Policy dated January 18th,2021 shall be obsolete.

1. Scope of complaints, submit through Whistleblower channel, covers i. e. fraud, misconduct or legal breach as well as other matters relating to business ethics. The scope does not include the cases that the Board of Directors or Executive Committee or the Managements have given resolutions or final decisions nor matter that is being filed in the court or has reached the final judgment of the court.
2. Complaints can be submitted through the following channels:
 - (1) Email to law.compliance@pttmcc.com

(2) By Post

To Office of President
PTT MCC Biochem Co., Ltd.
14th Floor, Energy Complex Building B
555/2 Vibhavadi Rangsit Rd., Chatuchak,
Bangkok 10900

(3) Other channels (if any)

3. Complaints shall be comprised of (The form provided as an attachment)

- (1) Name and surname of complainant in order to reporting results, however, the complainant may choose to remain anonymous.
- (2) Name, surname and address of the person who is accused in the complaint (if available).
- (3) The date that the complaint is filed.
- (4) The date that the complained action took place.
- (5) Information and description of complained actions which are within the scope mentioned above.
- (6) Evidence relating to the complaints (if any).

4. The Company will protect the identities and personal information of the complainant or relevant witnesses at a Strictly Confidential level, in accordance with the confidentiality and security of document rules of the Company.

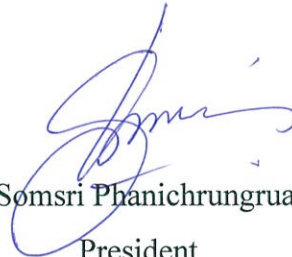
In principle, when a complainant fully completes the complaint process, he/she will receive a registration number and code number to identify him/herself when contacting the Company. This registration number and code number will replace the complainant's real name or personal information and identity during the investigation process. This is to protect and secure the identity and personal details of complainants or witnesses. Privacy and identity protection measures, however, can be modified or altered if the Company deems appropriate or necessary.

The Company will correspond to the complainant in the following ways:

- To confirm receipt of complaints or registration for complaint filing
- To request for additional details and information

- To inform and update the progress or inform the result
 - Other correspondences deemed appropriate
5. Consideration or investigation processes and determination of penalties will be in accordance with the rules, regulations issued by the Company, or any relevant rules and laws.
 6. The complainant shall be aware and understand that all complaints made to the Company must be in good faith and honest, and only truthful information be given. In the event that the complainant intends to give false information or to defame the organization or person(s) in the Company, the Company maintains the rights to enforce any action with the complainant according to the Company's procedures or relevant rules and regulations and can proceed to the relevant laws as appropriate.

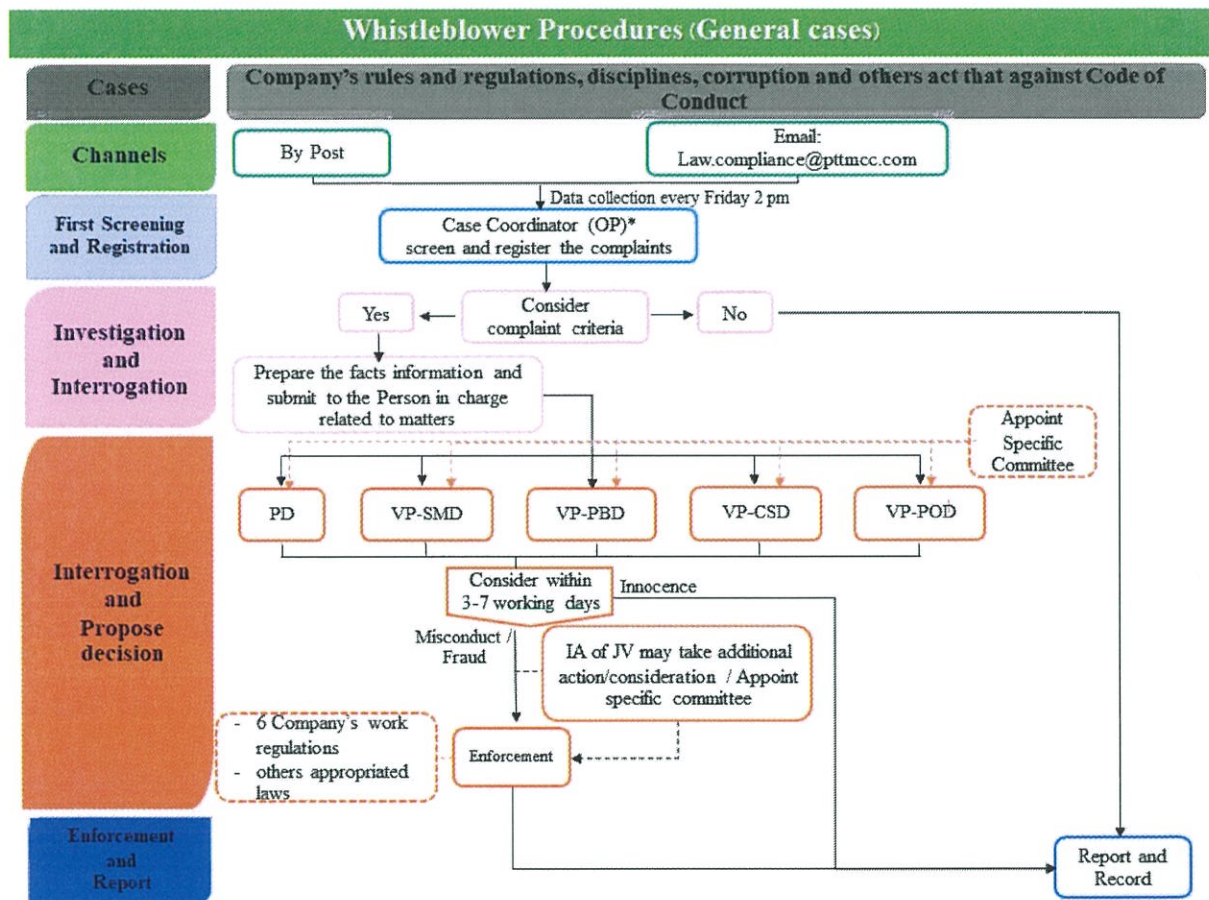
Announced on June 11th, 2021



(Ms. Somsri Phanichrungruang)
President

Whistleblower Procedures

1. Channels and procedures related to Company's rules and regulations, disciplines, fraud, misconduct or legal breach as well as other matters relating to business ethics. (General cases)



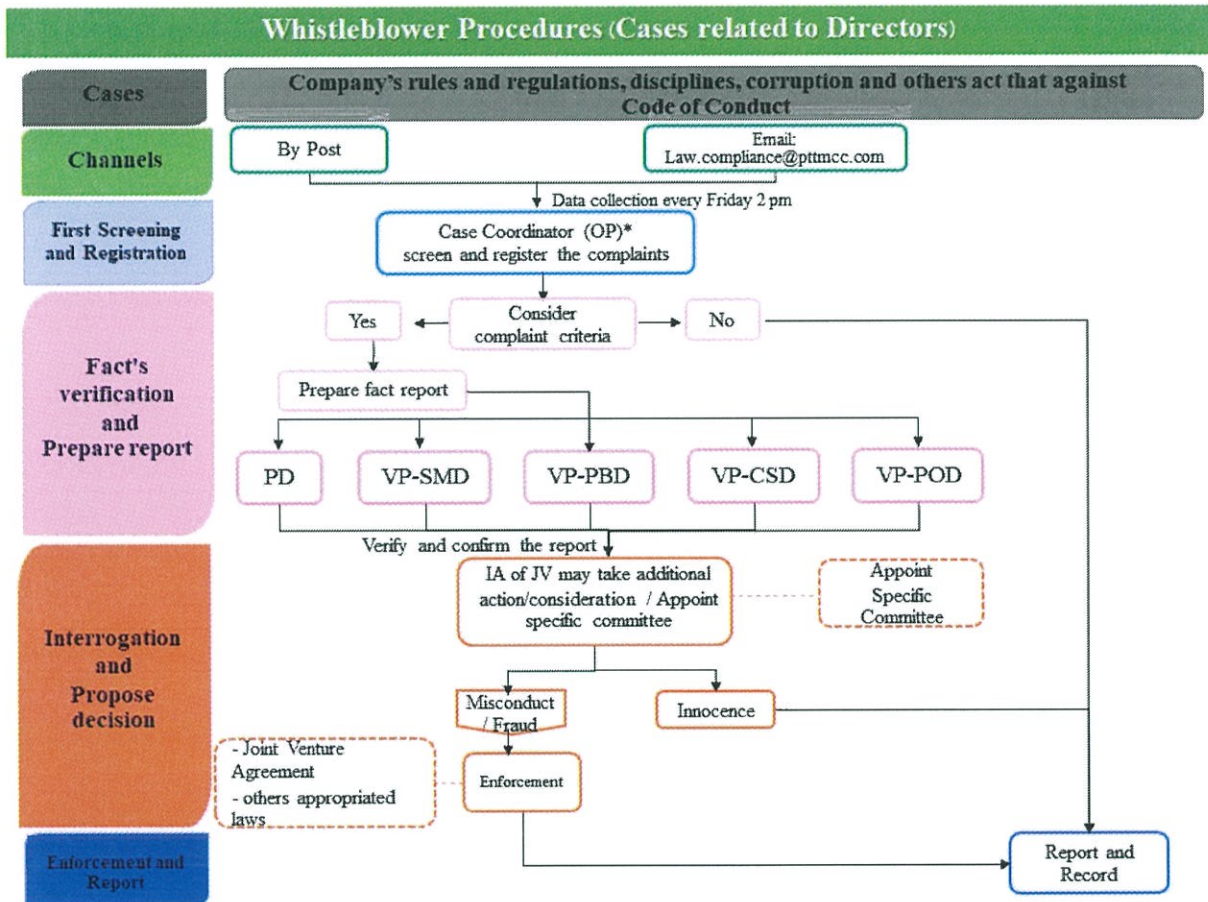
* If OP has been accused of misconduct, HR shall be the Case coordinator.

** Consider the relevant laws and regulations as follows:

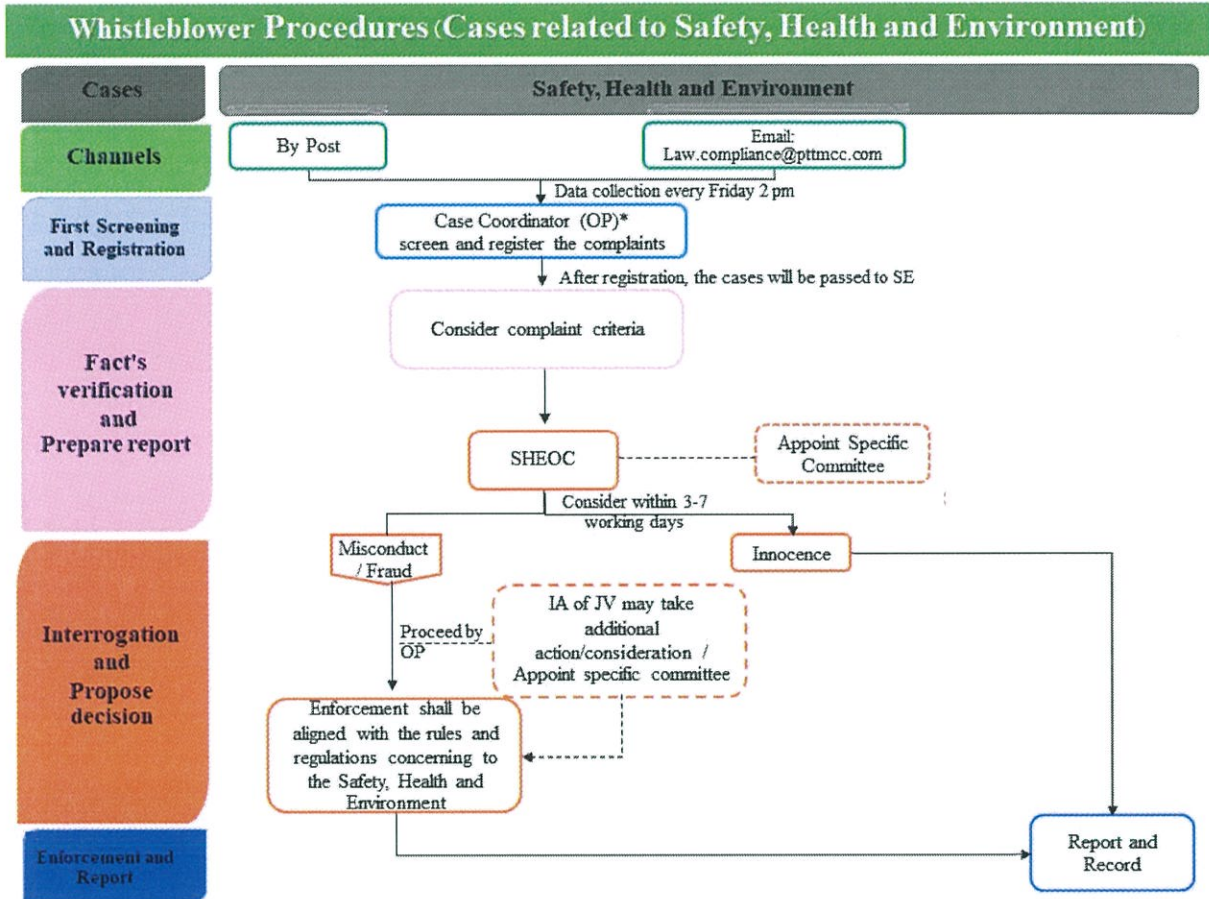
- 1) Labor Protection Act
- 2) Employee Regulations
- 3) Other laws as appropriate

*** The Case may be passed to JV's internal auditor for additional consideration

2. Channels and procedures related to Company's rules and regulations, disciplines, fraud, misconduct or legal breach as well as other matters relating to business ethics. (Cases related to Directors)



2. Channels and procedures related to Safety, Health and Environment



*The Case may be passed to JV's internal auditor for additional consideration

2. Scope of Complaints

The complaint handling process and criteria will be as follows:

Case	Case Coordinator	Remark
2.1 The case that has the final resolution	- Not accept - Inform the result	Record as general matter
2.2 The case which is being prosecuted in the court or have the judgement	- Not accept - Inform the result	Record as general matter
2.3 The case which is being under the Managements' consideration or has the final resolution	- Not accept - Inform the result	Record as general matter
2.4 The complaints that cannot be investigated or cannot proof	- Submit for Managements' consideration - Inform the result	- Continue investigating or close the complaint - Record as general matter
2.5 The case related to Code of Conduct, anti-corruption or compliance	- Register the complaints - Inform the result - Submit the case to the related department	- The Managements may appoint the specific committee to investigate the complicated/ major cases or may hire the hire external expertise
2.6 Others case that don't mentioned and must meet the complaint criteria	- Register the complaints - Submit the case to the related department	- The Managements may appoint the specific committee or hire the hire external expertise

3. To create a register of complaints

- 1) Specify the Identity registration number (ID) (case number) consist of 8 digits and means as follows:

1	2	-	3	4	/	5	6	7	8
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- The 1st and 2nd digit show the ‘WB’ in capital letter represent Whistleblower and followed by “-”
- The 3rd and 4th digit represent the registration number start from 01 to 99, accordingly
- The 5th until the 8th represents the Buddhist Era (B.E.)

Example: the 1st compliant in 2564

W	B	-	0	1	/	2	5	6	4
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- 2) Set the passcode

Setting the passcode for identifying the anonymous complainants and to follow up the case shall consist of random numbers and letters

Form of Complaint

(1) Name and surname of complainant	
Name	Surname
(2) Name, surname and address of the person who is accused in the complaint	
Name	Surname
Address (if any)	
(3) The date that the complaint is filed	
Date	/ Month / Year
(4) The date that the complained action took place	
Date	/ Month / Year
(5) Information and description of complained actions which are within the scope mentioned above	
(6) Evidences relating to the complaints (if any)	

* Complaint can fill data and sending soft file through email, or filling by printing out this document attach as PDF File.