

WINNERGY MEDICAL PUBLIC COMPANY LIMITED

Whistleblowing & Complaints

Procedure

Version Control for Whistleblowing & Complaints Procedure

Issue No.	Edit No.	Page	Item No.	Date and Modification Details
00	-	-	-	08/09/2020: Manual commencement
01	01	-	-	16/12/2022: Reviewed and assessed the adequacy of the Whistleblowing & Complaints Procedure, by which the Board of Directors' Meeting resolved to approve the amendment to the contents as follows-
01	01	3	4	Amended the definition of "Corruption" to have the same meaning as "Fraud and corruption" defined in the Company's Anti-Corruption Policy.
01	01	3	6	Clearly defined the duties of the <u>Head of Internal Audit Department</u> regarding the initial responsibility for investigating misconduct or corruption as defined in this guideline.
01	01	4	7	Changed the channel for whistleblowing and complaints to only one channel, i.e. via email: whistleblowingandcomplaints@winnergy.co.th to control complaints from being sent through multiple channels which may cause errors in compiling the Company's complaints. There is only one person who is responsible for accessing and keeping information and details about such complaints or whistleblowers.
01	01	5	12	Assigned <u>additional persons to the Audit Committee or appointed by the Board of Directors</u> to be responsible for preparing reports on investigation results to report to the Chief Executive Officer, Board of Directors, Audit Committee, and related persons, depending on the case (originally defined as the duty of the Head of Internal Audit Department only).

Whistleblowing & Complaints Procedure

In order for the Company to have an organizational culture in conducting business with responsibility, accuracy, transparency, verifiability, and to comply with business ethics, Corporate Governance Policy, and policies against corruption as specified by the Company, the Company expects its employees at all levels to perform their duties and behave professionally with honesty and ethics while performing their duties in accordance with the Company's policies, regulations, rules, and orders, as well as strictly complying with relevant laws. The company believes that all its employees must be treated fairly, equally, and without discrimination.

Therefore, this document of whistleblowing and complaints procedure is a guideline for implementation as a channel for executives, employees, and stakeholders to make complaints and report clues about misconduct and corruption to the Company. The main policies and principles are as follows:

1. This policy applies to all directors, executives, and employees of the Group.
2. This policy covers misconduct and corruption, whether it appears or suspected relating to directors, executives, employees, suppliers of goods or services, creditors, debtors, customers, trading partners, shareholders, and other stakeholders related to the Company.
3. **Misconduct** means an act or omission of any action which violates the code of business conduct, policies, rules, and regulations of the Company.
4. **Corruption** shall have the same meaning as "fraud and corruption" as defined in the policy against corruption of the Company.
5. **Complainant** refers to directors, executives, employees of the Company, or stakeholders who complained or reported clues of misconduct or any fraud that occurred in connection with the Company with good intentions.

6. The Head of Internal Audit Department is primary responsibility for the investigation of misconduct or fraud as defined in this guideline in collaboration with the Legal and Compliance Department and the Human Resources Department as well as preparing a summary report to submit to the Executive Committee and the Audit Committee to be informed, including progress notifications and the result of consideration for the complainant to be informed.
7. In case of suspect or witnessed any act that is considered misconduct or corruption, the complainant can report a complaint or clues to the Company via email whistleblowingandcomplaints@winnergy.co.th, here only one person is responsible for accessing and keeping information and details about such complaints or whistleblowers.
8. Complainants should be made in writing by filling out the information in the "Whistleblowing and Complaints Form" of the Company, which should contain at least the following information:
 - (1) Nature and details of complaints or report clues of misconduct or corruption
 - (2) A list of individuals believed to be involved in the incident with grounds for believing that such individuals are involved
 - (3) Date, time, place, and source of information that can lead to evidence for investigation
 - (4) Expected damage whether in the form of money or related property.

Moreover, the complainant must disclose his/her name and channels that can be contacted, so that the Company can ask for more information or notify the progress and results of the consideration to the complainant. If the complainant does not disclose or show their name, the Company reserves the right not to receive complaints or the clue into the process as specified by the Company.

9. In case the complainant is an employee of the Company, although after the Company has investigated according to the procedure and found that there was no misconduct according to the complaint. The Company will not take any sanctions against the person who provided the information. If it is done in good intention and not malicious intention, or deliberately causing a derogatory effect, or providing false information. The Company has the right to consider

punishing the employee(s) who has provided the information according to the "Working Regulations Manual" of the Company, including legal proceedings.

10. Investigation of misconduct and corruption must be carried without any prejudice to know the facts arising from all parties involved, which must be performed with independence and justice to clearly prove whether the accused person has committed misconduct or corruption according to the Complaint, along with evidence that can be used to confirm or to dispute such action.

If found guilty or there was an actual corruption, the Company will take disciplinary action and/or take legal action against the offender.

11. In case an interrogation is required to obtain relevant information for the purpose of investigation, a request may be made to the deponent to write a statement or record an audio tape, and there must be a representative of the Human Resources Department attending every interrogation.

The inspector of the interrogation is assigned to record the interrogation in a clear and concise written testimony. The deponent shall read his/her own testimonial record before signing the testimonial record every time. If the deponent refuses to sign, a note must be recorded in the respective testimony. In addition, every individual participated in the interrogation must sign in the testimonial record.

12. Once the investigation is completed, the Head of Internal Audit Department, a member of the Audit Committee, or an individual appointed by the Board of Directors, is responsible for preparing reports on the investigation results to report to the Chief Executive Officer, Board of Directors, Audit Committee, and related persons, depending on the case.

13. In case an investigation has been conducted and found that a misconduct or corruption has occurred according to complaint. The Company will act or conduct punishment according to the "Working Regulation Manual" of the Company.

In addition, if the misconduct or such corruption causes damage to the reputation, image, credibility, and trust of the Company, or is an act that violates the law, the Chairman of the Executive Board or the Chief Executive Officer along with the Legal and Regulatory Department

shall decide whether to take legal action against the offender and notify the result of such consideration to the Executive Committee for acknowledgment.

14. The Company will provide protection and will not tolerate intimidation, harassment, dismissal, suspension, disciplinary punishment, or a threat to take any action against employees who have complained, reported clues, or provided information of misconduct and corruption, including those who cooperate or assist in an investigation with good intentions. If it is found that any individual has done any of the above, the Company will immediately take disciplinary action against that individual.

In addition, if the complainants or those who cooperate or assist in the investigation have been threatened, they must immediately report to the Human Resources to provide appropriate protection, depending on the case.

15. Individuals involved in the complaint, whistle blowing, or corruption have a duty to keep the information they receive in any form confidential. It is forbidden to disclose such information to any other person unless it is necessary due to work or only if it complies with the law.
16. The Internal Audit Department is responsible for preparing a report summarizing the receipt of reports of misconduct and corruption, even though it has already been considered or is under investigation for the Executive Committee and the Audit Committee to be informed at least once a year.
17. In case of any questions about this policy, the Internal Audit Department, Legal and Compliance Department, or the Company's Human Resources Department shall be contacted for further clarifications.
18. All executive members and employees should read and understand this policy along with the following documents:
 - (1) Corporate Governance Policy
 - (2) Code of Conduct
 - (3) Work Regulation Manual

19. The Internal Audit Department is responsible for monitoring compliance with this guideline, where the Internal Audit Department and the Legal and Compliance Department will review and improve the rules/policy for receiving complaints and clues about misconduct and corruption, investigation, and protection of the complainants as necessary and appropriate at least once a year.

This Whistleblowing & Complaints Procedure has been reviewed and approved to be amended from the Board of Directors' Meeting No. 6/2022 on 16 December 2022 and is effective from 16 December 2022 onwards.

(Asst. Prof. Dr. Terdsak Rojsurakitti)
Chairman, Board of Directors
Winergy Medical Public Company Limited

**แบบการแจ้งข้อมูลการกระทำผิดและการทุจริต
(Misconduct & Fraud Report Form)**

วันที่รายงาน _____

Date of Report

ชื่อ-นามสกุล ผู้ร้องเรียน / แจ้งเบาะแส _____

Whistle Blower's Name

ที่อยู่ที่สามารถติดต่อได้ _____

Contact Address

หมายเลขโทรศัพท์ _____ อีเมล _____

Telephone Number

Email Address

ชื่อบริษัทที่เกี่ยวข้องกับเรื่องที่ร้องเรียน / แจ้งเบาะแส _____

Related Company's Name

วันที่เกิดเหตุ พบเห็น หรือรับทราบการกระทำความผิด หรือการทุจริต _____

Date of Incident or Discovered Misconduct or Fraud

โปรดระบุลักษณะ และรายละเอียดของเรื่องที่ร้องเรียน / แจ้งเบาะแส การกระทำผิด หรือการทุจริต

Please specify nature and details of misconduct or fraud complaints

รายชื่อของบุคคลที่เชื่อว่ามีส่วนเกี่ยวข้องกับเหตุการณ์ พร้อมมูลเหตุที่ทำให้เชื่อว่าบุคคลดังกล่าวมีส่วนเกี่ยวข้อง / Name of Person(s) believed to be involved in incident and the basis for such belief

แหล่งข้อมูลที่สามารถนำไปสู่การหาพยานหลักฐานสำหรับการสอบสวน

Source of information leading to find out evidence for investigation

ความเสียหายที่คาดว่าจะเกิดขึ้น ไม่ว่าในรูปของตัวเงิน หรือทรัพย์สินที่เกี่ยวข้อง
Estimate the suspected loss in money or other assets value which are involved

หมายเหตุ สามารถแนบเอกสารอื่นใดเพิ่มเติม (ถ้ามี)

Remark Additional attachment (if any)

ลงลายมือชื่อผู้ร้องเรียน / แจ้งเบาะแส _____

Whistle Blower's Signature