

Policy on whistleblowing and complaints

In order to comply with the resolution of the Board of Directors of Infraset Public Company Limited at the meeting No. 5/2020 on November 4, 2020, the Company issued a notice on Policy on whistleblowing and complaints to be considered as the principles and guidelines of practices as follows:

Infraset Public Company Limited gives importance to cautious business operations about corruption by adhering to the principles of good corporate governance for the best interest of shareholders, stakeholders and related persons. Therefore, it established a policy on whistleblowing and complaints as a practice guideline as follows:

1. Objectives

According to the fact that the Company has anti-corruption policy, it therefore established a policy on whistleblowing and complaints in order to assure the participants of the anti-corruption to understand that the Company has channels and processes for whistleblowing. and complaints that are transparent, safe and fair to whistleblowers or complainants.

2. Scope of Whistleblowing and complaints

When there is a doubt, belief or a reason to believe in good faith that there is an act of dishonesty or non-transparency or there is a violation of good practice regarding

- 2.1 Company policies, regulations, requirements or rules
- 2.2 Good corporate governance, Code of Conduct and Ethics of the Company
- 2.3 Laws, government regulations

3. Person who can report clues and give complaints

Company personnel at all levels Including third parties or those who know the doubt to the scope as specified in Article 2 can report clues and complaints to the Company

4. Protection

- 4.1 The Company will keep information and details of whistleblowers or complainants, and the person being complained as a secret or it may be revealed only to those involved in the investigation, or persons involved in a limited circle. In this regard, for any disclosure of information, the Company will consider the case carefully, taking into account the safety and damage of the whistleblowers or the complainants, sources of information, or related persons.
- 4.2 The Company will appoint an investigation committee in order to jointly consider whistleblowing and complaints in detail with prudence, and fairness to all parties.
- 4.3 If the complainants or those who cooperate in the investigation deem that they may be unsafe or may suffer damage, they can request the management or the investigation committee to prescribe appropriate protection measures.

5. Appointment of the investigation and fact-checking committee

The Company has assigned the managing director to consider and appoint an investigation and fact-checking committee to collect evidence and undertake any investigation of the clues or complaints including providing advice on how to resolve the complaints. The investigation process must be transparent and upright.

The investigation and fact-checking committee consists of representatives from three departments or divisions of the Company, which are

1. Human Resources
2. Affiliate department of the whistleblowers or complainants
3. Other departments or divisions with independence such as the legal department, accounting department, etc.

6. Channels for whistleblowing and complaints

The Company has established a channel for receiving whistleblowing and complaints as follows:

6.1 By mail: sent directly to the Board of Directors or the audit committee

Infraset Public Company Limited
No. 165 / 37-39, Ramintra Road
Anusawari Subdistrict, Bang Khen District, Bangkok 10220

6.2 By email: ifssec@infraset.co.th

6.3 On the website: <https://infraset.co.th/corruptionforms/>

In addition, for all channels of whistleblowing and complaints, the company secretary will coordinate in receiving-sending matters, collecting and following up on investigation results.

7. Procedures

7.1 In case of employee complaints, it must comply with the working regulations on complaints.

7.2 In case of whistleblowing and complaints Within the scope specified in Article 2, the Company secretary shall proceed as follows:

(1) In the case of insignificance or the value of the damage not being much, the complaint must be submitted to the managing director to consider and order the Human Resources Department to check the facts and prepare a summary report of the audit results and comments or recommendations for the managing director to consider and summarize the results to notify the company secretary to collect information.

(2) In the case it is a significant matter or there are a lot of cost of the damage, it must be reported to the managing director immediately for him/her to

consider and order the investigation and fact-checking committee to proceed according to the process and make the copy to notify the audit committee.

7.3 Results from investigation of whistleblowing and complaints

(1) In the case that the person being complained is not guilty, or it is a matter of a misunderstanding or the advice has been given to the person being complained or related people for appropriate or right behaviours, and there is no punishment, the investigation committee must summarize the results to the managing director, make a copy to notify the company secretary and the audit committee.

(2) In the case of the complained person is guilty and punished with disciplinary action and or legal proceedings (if any), the investigation committee must offer opinions and suggestions to the managing director for consideration and approval. When it has been concluded, the investigation committee must summarize the results of the investigation to inform the company secretary and the audit committee.

(3) In the case of a complaint from an anonymous person and unable to obtain sufficient additional information, it must be reported to the managing director to consider and order for further implementation.

7.4 Report of summary results to complainant and improvements

The investigation committee inform the result of the operation to the complainant and summarize solutions and improvements and propose to the Managing Director.

8. Dishonest complaints

In reporting a complaint, whistleblowing, giving a statement or providing any information, if it can be proven as an act of bad faith or deliberate fraudulence, slander, distortion of facts, in the case of employees, disciplinary penalties are to be considered in accordance with the work regulations and company regulations. In the case of an action by a third party, including an action by company employees, which causes the Company to suffer damage, the Company may consider taking legal action as the case may be.