

## Whistleblowing Policy: 2<sup>nd</sup> Revision

SCG realizes the importance of preventing corruption or misconduct of operation and contacting with persons having interests which may affect decision and business operation of SCG. Therefore, SCG establishes a mechanism for receiving whistleblowing and procedure in the event that whistleblowing regarding a breach of legal requirement, wrong doing of rules, regulations and code of conduct of SCG or suspected act of corruption including protection measures to bring fairness to whistleblower regarding corruption or non-compliance of laws, rules, regulations and code of conduct. SCG has reviewed the previously issued Whistleblower Policy and implemented this revised Whistleblowing Policy to ensure that SCG has in place a policy that defines responsibilities, guidelines, and appropriate operational requirements to assure that clear guidance and efficient handling of whistleblowing regarding corruption and misconduct are in place.

### 1. Objective

- 1.1 The receiving of whistleblowing regarding corruption, misdeed and misconduct of regulations of SCG is processed appropriately, efficiently and complies with good corporate governance principle.
- 1.2 Employees and any parties acting on behalf of SCG conduct the business lawfully, transparently, fairly and verifiably by following applicable laws, good corporate governance guidance, business ethics and regulations of the Company.
- 1.3 Any person willing to report SCG on misconduct of operation or suspicious of misconduct made by a director, employee or person acting on behalf of SCG can do so via channels provided by SCG.
- 1.4 The informants or Whistle Blowers or persons assisting SCG honestly are appropriately and fairly protected and prevented from maltreatment caused by raising the whistleblowing.
- 1.5 The concerned persons are prevented from any risk and damage arising from breach of laws, business ethics or acts of a director, executive and employee of SCG.

### 2. Definitions

- 2.1 “**Misconduct**” means any act of doing or not doing by the SCG personnel which breaches laws, articles of association, code of conduct, working rules, policy and regulations of SCG.
- 2.2 “**SCG**” means The Siam Cement Public Company Limited and its subsidiaries.
- 2.3 “**SCG Personnel**” means director, executive and employee of SCG and its subsidiaries.

- 2.4 “Subsidiary” means a subsidiary company included in the consolidated financial statements of SCG.
- 2.5 “Whistle Blower” means any person or the SCG personnel including various stakeholders, who has made a complaint or report of any misconduct occurring in SCG.

### 3. Persons Having Rights to Raise Whistleblowing

- 3.1 Any person or the SCG personnel who witnesses misconduct.
- 3.2 An employee who is maltreated, threatened or disciplinary punished such as reduced salary level, suspended, fired or discriminated by unfair act related to employment conditions caused by his or her raising of whistleblowing, providing information or going to provide information, assisting during investigation process or collecting information to persons receiving whistleblowing including legal prosecution, being witness, giving statements, or any cooperating to court or government agency.
- 3.3 If there is sufficient evidence that the Whistle Blower has raised the whistleblowing dishonestly, SCG considers it is necessary to protect the reputation of the respondent as follows:
  - 3.3.1 investigating and punishing pursuant to SCG’s regulations if the Whistle Blower is the SCG personnel;
  - 3.3.2 considering legal action if the Whistle Blower is an external party and damage occurs to SCG.

### 4. Scope of Whistleblowing

- 4.1 The SCG personnel or any person acting on behalf of SCG may be the respondent under this policy if he or she commits a misconduct.
- 4.2 However, SCG will not receive the following cases:
  - 4.2.1 a case that the general meeting of Shareholders, Board of Directors, Audit Committee, Management Committee or Chief Executive Officer has already resolved according to its power of authorities;
  - 4.2.2 a case that has been processed in the court or already judged or ordered by the court;
  - 4.2.3 a case from non SCG personnel without genuine name and address of the Whistle Blower;
  - 4.2.4 a case without identified witness, clue, evidence or act of corruption or misconduct as sufficient to further investigate for more fact and finding;

4.2.5 a case that the Human Resource Office of SCG or its subsidiaries or other authorized office has already received, considered or decided fairly and no additional material evidence is newly provided.

## 5. Channels for Filing Information or Raising Whistleblowing

5.1 Employees can raise whistleblowing via, the SCG Whistleblowing System which is accessible to every employee. Whistle Blower can direct their whistleblowing, with or without identifying their names, to any of the following:

- Trusted supervisors
- The Director of the Corporate Human Resources Office
- The Director of Internal Audit Office
- The Company Secretary
- Any Director of the Company

The whistleblowing can also be submitted verbally or formally via letters or e-mails to any of the aforementioned parties or to the Independent Directors at [ind\\_dir@scg.com](mailto:ind_dir@scg.com).

5.2 For external parties, whistleblowing can be lodged on [www.scg.com](http://www.scg.com) under the SCG Whistleblowing System. Whistle Blowers are required to identify their names and can direct their whistleblowing to any of the following:

- Corporate Secretary Office
- Internal Audit Office
- An Independent Director
- Audit Committee

Whistleblowing can also be lodged in the form of a formal document submitted to any of the aforementioned parties.

## 6. Whistleblower Protection

6.1 If the Whistle Blower chooses to disclose their identities, SCG will be able to inform them of progress of findings or mitigate damages more quickly and easily.

6.2 SCG regards relevant information as confidential and discloses it only as necessary to ensure the safety of, and prevent harm to, the Whistle Blower, their sources, and other individuals involved.

- 6.3 If the Whistle Blower believes that they will come under threat, they may ask SCG to provide appropriate protection or SCG may provide such protection without their request if it is believed that danger of harm is likely.
- 6.4 SCG takes a fair and suitable approach without retaliation, harassment, or discrimination when engaging with the Whistle Blower who reports fraud, breaches of state laws or regulations, or non-compliance with SCG's Articles of Association or the code of conduct of SCG, even in the event that they file a lawsuit, testify, give a testimony, or cooperate with a court of a government agency. Failure to comply with this approach is considered a breach of discipline and subject to disciplinary action as well as any applicable legal punishment.
- 6.5 Those who incur harm will be compensated in a fair and appropriate manner.

## 7. Whistleblowing Investigation

- 7.1 The whistleblowing recipient is to investigate and verify the validity or assign reliable persons or divisions to verify the validity. The preliminary investigation should reach a conclusion within 30-60 days, depending on its complicity. After the investigation is finalized, progress reports are also made to the Whistle Blowers within seven days if their identities are identified.
- 7.2 The whistleblowing recipient or the assigned person can invite any SCG personnel to provide information or send any relevant documents for investigation.
- 7.3 If the investigation results that the misconduct is committed, SCG will proceed as follows:
  - 7.3.1 If the misconduct regards to breach of laws, rules, regulations or code of conduct, the case is to be proposed with opinion and correct guidance to SCG's authorized person to consider. The case which is considered material such as having impact to reputation or financial performance of SCG, conflict with the business policy of SCG, or related to executives of SCG is to be proposed to the Audit Committee or the Board of Directors for their consideration.
  - 7.3.2 If the misconduct brings damage to any party, SCG is to propose appropriate and fair remedy measurement to sufferers.

## 8. Punishment

- 8.1 If the accused person commits the misconduct, he or she is to be considered and punished according to disciplinary punishment of SCG and if said misconduct breaches the laws, he or she will be legally punished according to civil, criminal or other laws. Disciplinary punishment and/or decision of the Audit Committee or the Board of Directors are considered final.
- 8.2 The SCG personnel who acts with other person unfairly, with inappropriate method or causing damage to such person as resulted from such person's whistleblowing or reporting information or providing clues regarding misconduct is considered breaking discipline and subject to punishment, provided that the punishment may include those prescribed by laws if said misconduct is breach of laws.

## 9. Communication

- 9.1 SCG will communicate and disclose this Whistleblowing Policy and whistleblowing channels to the SCG personnel through several media such as new director and employee orientation, training, seminar, publishing in workplace and via electronics system of SCG, etc. to assure the understanding of the SCG personnel and their strict compliance under this policy.
- 9.2 SCG will communicate and disclose this Whistleblowing Policy and whistleblowing channels to public, subsidiaries, affiliates and stakeholders through several channels such as SCG's website, annual report, Sustainability Report, etc.

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Revised and effective from 26 May, 2022 onwards

According to the resolution of the Board Meeting on 25 May 2022

Air Chief Marshal

*-signed-*

(Satitpong Sukvimol)

Chairman of the Board of Directors