

Whistleblowing Policy

Meb Corporation Public Company Limited

Whistleblowing Policy

Meb Corporation Public Company limited (“**the Company**”) has a policy to protect and ensure fairness for complainants or whistleblowers who provide information or report on corruption or non-compliance with laws, regulations, practices, guidelines, policies, and code of conduct. The Company therefore establishes procedures, reporting channels, and protection measures for complainants or whistleblowers under this Whistleblower Policy as follows

1. **Eligible Complainants or Whistleblowers**

- (1) Personnel of the Company and its subsidiaries at all levels, and all stakeholder groups of the Company and its subsidiaries, such as shareholders, customers, employees, competitors, creditors, government authorities, communities, and society, who observe personnel of the Company or its subsidiaries committing corruption related to the Company or its subsidiaries, or violating laws, regulations, Company rules, practices, policies, or business ethics of the Company and its subsidiaries.
- (2) Individuals who have been treated unfairly, such as being harassed, threatened, or disciplined, as a result of reporting, providing information, cooperating, assisting in investigation steps, collecting facts, testifying, giving statements, or otherwise cooperating with courts or government agencies.

2. **Matters Subject to Complaint**

- (1) Non-compliance with laws, including the Securities and Exchange Act, regulations, Company rules, practices, policies, and business ethics of the Company and its subsidiaries.
- (2) Acts of corruption related to the Company and its subsidiaries, whether directly or indirectly, such as witnessing organizational personnel offering or accepting bribes from government officials or private sector authorities.
- (3) Acts that violate Company or subsidiary procedures, inaccuracies in financial reports, or deficiencies in internal control systems that may indicate potential avenues for corruption or cause harm to the Company or its subsidiaries.

3. **Reporting Channels**

Complainants may file complaints or report whistleblowing matters through the following reporting channels. The complainant must provide details of the matter being reported or complained about, along with their name, address, and contact telephone number, and submit it through the following channels:

- (1) If the person being complained about holds a position immediately below the Managing Director:

Report via email to the Managing Director at whistleblower@meb.co.th or send by mail to the Managing Director at the following address

Meb Corporation Public Company Limited
99/27 Software Park Building, 8th Flr., Moo 4
Chaengwattana Rd., Khlong Kluea, Pak Kret,
Nonthaburi 11120

- (2) If the person being complained about holds a position from Managing Director upward:

Report via email directly to the Chairman of the Audit Committee at whistleblower@meb.co.th or send by mail to the Chairman of the Audit Committee at the following address

Meb Corporation Public Company Limited
99/27 Software Park Building, 8th Flr., Moo 4
Chaengwattana Rd., Khlong Kluea, Pak Kret,
Nonthaburi 11120

The complaint will be treated as strictly confidential. Complainants may report through more than one channel and are not required to disclose their identity, except that revealing their identity may allow the Company to inform them of the results of the investigation or provide additional details regarding the complaint or whistleblowing report.

4. Procedures for Investigating Facts and Disciplinary Actions

1. In conducting investigations and gathering facts, the recipient of the complaint shall submit the complaint to the following persons to act as the investigator and gathering facts (“Investigator”) according to the nature of the complaint:

- (1) If the person being complained about holds a position immediately below the Managing Director:

The Managing Director and/or the person or unit assigned by the Managing Director shall act as the Investigator.

- (2) If the person being complained about holds a position from Managing Director upward:

The Audit Committee and/or the person or unit assigned by the Audit Committee shall act as the Investigator.

In this process, the Investigator may summon any employee to provide information or request the submission of any relevant documents to verify the facts. If the Investigator is a person or unit assigned by the Audit Committee or the Managing Director, such person or unit shall report the results of the investigation back to the Audit Committee or the Managing Director (as appropriate).

2. If there is reasonable belief that the person being complained about has committed a violation, the accused shall be informed of the allegations and has the right to defend themselves by providing additional information or evidence demonstrating that they are not involved in the misconduct as alleged.
3. If the investigation confirms that the complaint is valid, the Company shall take the following actions
 - (1) The offender shall be subject to disciplinary action in accordance with the Company's regulations. If the misconduct constitutes a legal offense, the offender may also face legal penalties.
 - (2) If the complaint is significant, such as affecting the Company's reputation, public image, or financial status, conflicting with the Company's business policies, or involving senior executives, the Investigator shall submit the matter along with their recommendations to the Board of Directors for further consideration.
 - (3) If the complaint causes harm to an innocent party, the Investigator may propose appropriate and fair remedies to compensate the affected party as deemed reasonable.

5. Measures to Protect Whistleblowers

- (1) A whistleblower may choose to remain anonymous if disclosure could cause harm to themselves. However, they must provide sufficiently clear details or evidence showing reasonable grounds to believe that an act of corruption, or a violation of laws, regulations, company rules, practices, or business ethics has occurred.
- (2) Information related to the complaint or whistleblowing, including the identity of the whistleblower, will be treated as confidential by the company and disclosed only as necessary, taking into account the safety and potential harm to the whistleblower and related parties. All personnel handling the complaint, investigators, and responsible parties at every stage must maintain the information as strictly confidential and must not disclose it to others. Any breach of this confidentiality will be considered a disciplinary offense.

- (3) The company will not demote, discipline, or take any negative action against a whistleblower or an employee who refuses to participate in corruption, even if the action results in a loss of business opportunity for the company.
- (4) Individuals who suffer harm or loss will be provided with relief through appropriate and fair methods or procedures.
- (5) The Board of Directors, the Audit Committee, the Managing Director, or any designated person may consider additional measures to protect whistleblowers, informants, or those cooperating in an investigation if it is deemed likely that such individuals could face harm or danger due to reporting or whistleblowing under this policy.
- (6) Employees who treat others unfairly, discriminate inappropriately, or cause harm to another person due to that person's reporting, providing information, or whistleblowing about corruption or violations of laws, regulations, company rules, practices, policies, or code of conducts including participating in lawsuits, giving testimony, or cooperating with courts or government agencies will be considered in violation of disciplinary rules and will be subject to

This Whistleblowing policy shall be effective from 18 April 2022, onward.