Whistle-blowing and Grievance Policy

Objectives

- 1. To encourage directors, executives and all staff to follow code of conduct, law and regulation.
- 2. To encourage directors, executives and all staff to raise a concern about malpractice, wrongdoing or impropriety without malice and in good faith.
- 3. To offer whistleblowers protection from harassment or disciplinary proceedings

Scope of the Policy

The policy may deal with specific concerns as follows:

- 1. Infractions of legal obligation
- 2. Breach of the Company's regulations
- 3. Unethical behavior
- 4. Corruption
- 5. Injustice in the workplace
- 6. Improper financial statements
- 7. Misconduct which may affect the Company

Whistleblowing Channels

Individuals may raise a concern through various channels including:

- 1. Vice President of Organization Development Department
- 2. Vice President of Office of Compliance
- 3. Chairman of the Executive Board
- 4. Chairman of the Audit Committee through Secretary of the Audit Committee

Consideration and Process

- 1. The information of the matter must be substantially true and clear enough for the investigation process.
- 2. Whistleblowers must identify themselves for further information.
- 3. The matter disclosure and the investigation process are kept confidential. Concerns and complaints of staff will be responsible only by those related to investigation. Concerns related to Executives are disclosed directly to the Audit Committee for investigation and report the findings directly to the Audit Committee.
- 4. Vice Presidents of Organization Development Department, Office of Compliance and Office of Internal Audit are responsible for the investigation and report the findings to the President and the Audit Committee
- 5. The investigation must be conducted with justice.
- 6. The duration of the investigation depends on the complexity of the issues, the sufficiency of the evidence provided by whistleblowers and those involved with the process of investigation.
- 7. Any individual found responsible for making allegations maliciously or in bad faith may be subject to disciplinary or legal action.

Protection of Whistleblowers

- 1. The identity of the whistleblower and the accused will be kept confidential.
- 2. Whistleblowers are protected from harassment or disciplinary action as a result of any disclosure, where the disclosure is made in good faith and is not made maliciously or for personal gain.