

Whistleblowing Policy

The Navakij Insurance Public Company Limited (“the Company”) has provided whistleblowing and grievance policy for employees, stakeholders and third parties in case of inappropriate transactions in the financial statements, unethical acts against rules and laws, including behavior that may imply fraud or misconduct by insider or outsider of the Company. The Company will consider and examine the details to find out the facts fairly, pay attention to protect whistleblowers and complaints confidential with whistleblowers protection measures.

Objectives

1. To encourage directors, executives, employees and external parties related to the Company to follow Code of Conduct, law and regulation.
2. To encourage directors, executives, employees and external parties to raise a concern regarding malpractice, wrongdoing, fraud 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 or fraud
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. Chief Executive Officer
4. Chairman of the Audit Committee via the secretary of the Audit Committee

Investigation Process and Penalty

1. The information of the matter must be substantially true and clear enough for the investigation process.

2. The matter 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.
3. The President shall appoint 3 vice presidents who are independent from concerns and complaints as the investigation Committee.
4. The Investigation Committee will provide the management approach including remedies for damage and propose to the President for operation approval.
5. The investigation must be conducted with fair treatment of the accused. The accused has the rights to prove himself by providing additional information or evidence to show that he is not involved in the complaint.
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. The Investigation Committee shall report the result of investigation and remedies for damage to the Audit Committee via the secretary of the Audit Committee quarterly.

Protection of Whistleblowers

1. The Company will not disclose whistleblowers' name, address or other information.
2. The identity of the whistleblower and the accused will be kept confidential. The information shall be disclosed as necessary and limited only to those responsible, taking into consideration the safety and damage of whistleblowers, informants and sources of information.
3. Whistleblowers, accused and informants are protected from harassment or disciplinary action as a result of any disclosure
4. The Company shall not do anything unfair to whistleblowers, complainants or informants such as changing job positions, job characteristics, workplace, suspension of work or intimidation.
5. The remedy shall be approached properly.

False Whistleblowing or Complaint

Any individual found responsible for making allegations maliciously or in bad faith may be subject to disciplinary or legal action.

The Company reviews the policy regularly at least once a year or when there is a significant change.