
CPF Trading Company Limited

Whistleblowing Policy

1. Objective

CPF Trading Company Limited (“the Company”) realizes the importance of providing the whistleblowing and complaint channels for its personnel as well as external parties which have been, or are likely to be, affected by business operations of the Company and/or its subsidiaries, to raise their concerns regarding activities suspected of violating laws or the code of conduct. In addition, this Policy serves as a tool to monitor the business operations of the Company and/or its subsidiaries, and as an information source to enhance the security and efficiency of our business management. This Policy also provides guidelines that follow a clear, truthful and transparent process in compliance with international standards.

2. Scope

2.1 Application

This Policy applies to the Company and its non-listed subsidiaries. For the Company's listed subsidiaries and their subsidiaries, they can deploy this Policy as appropriate to align with their business context and internal management process according to the geosocial background of the country in which they operate.

2.2 **The scope of misconducts which are subject to be reported according to this Policy including the following misconducts of the Company, its subsidiaries and personnel:**

- 2.2.1 Misconducts related to any activity for unlawful benefit, including fraud, asset misappropriation, corruption and bribery;
- 2.2.2 Misconducts related to embezzlement, fraudulent financial reporting, deliberate deception by giving false information or concealing information that should be disclosed;
- 2.2.3 Misconducts in violation of the laws, regulations or rules applicable to the Company or its subsidiaries, as the case may be;
- 2.2.4 Misconducts in violation of the code of conduct, policies or internal rules of the Company or its subsidiaries;

2.2.5 Misconducts which may cause damage the Company or its subsidiaries.

3. Terms and Definitions

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| The Company | CPF Trading Company Limited |
| Subsidiaries | Subsidiary companies in accordance with Securities and Exchange Act and subsidiary companies as included in the financial statements of the Company, but excluding: (a) a subsidiary company whose ordinary shares are listed in any stock exchange; (b) any subsidiary company of a company under (a) |
| Directors | Directors of CPF Trading Company Limited and/or its subsidiaries |
| Executives | Executives of CPF Trading Company Limited and/or its subsidiaries |
| Employees | Any employees of CPF Trading Company Limited and/or its subsidiaries that receive daily or monthly remuneration whether on permanent or temporary employment |
| Personnel | Directors, Executives, Employees and permanent advisors of CPF Trading Company Limited and/or its subsidiaries |

4. Roles and Responsibilities

4.1 Board of Directors

- 4.1.1 To govern, encourage and support the personnel or external parties which have been or are likely to be affected by business operations of the Company due to the misconducts committed under 2.2 hereof, not to overlook or ignore on conduct whistleblowing or filing a complaint when experiencing such misconducts.
- 4.1.2 To govern, encourage and support a provision of whistleblowing channels and proper handling processes.

4.1.3 To govern, encourage and support disclosure of this Policy as well as reporting on the progress and result summary regarding whistleblowing and complaint matters.

4.2 Executives

4.2.1 To support the establishment of operational processes and whistleblowing and complaint channels including effective and efficient measures to protect whistleblowers, complainants and whistleblowing reporters.

4.2.2 To arrange for proper communication to the personnel and external parties related to relevant function to be aware of the Policy and its guidelines, processes and whistleblowing and complaint channels.

4.3 Personnel

4.3.1 To understand and comply with this Policy.

4.3.2 To conduct whistleblowing and/or file a complaint to assigned person when the personnel experience or may reasonably believe that the misconducts under 2.2 have been committed.

4.3.3 To fully cooperate in providing information.

5. Principle

5.1 Whistleblowing

5.1.1 Personnel, external parties, suppliers and business partners may conduct whistleblowing and file a complaint regarding the misconducts under 2.2 by providing their name and contact detail (i.e. telephone number and/or email) at:

Internal Audit Office, exclusive for whistleblowing and complaint report, by:

- A letter addressed to No. 1,1/1 Soi Yen Chit 2 Intersection 1, floor 4 Srapsamut Building 2, Yen Chit Road, Thung Wat Don Sub-district, Sathon District, Bangkok 10120; or
- Telephone call (02-780-8778, 085-842-7013)

5.1.2 Personnel or external parties may find additional information related to the whistleblowing policy and process from the Code of Conduct and this Policy or may contact the Internal Audit Office.

5.2 Protection measures for whistle-blower, complainant, and whistleblowing reporter

5.2.1 In case the whistle-blower, complainant or whistleblowing reporter is the personnel:

5.2.1.1 The Company and/or its subsidiaries will protect the whistle-blower, complainant or whistleblowing reporter from reprisals.

5.2.1.2 The whistler-blower, complainant or whistleblowing reporter's name, information in the whistleblowing report or any relevant information will not be disclosed to any irrelevant parties except as required by law.

5.2.1.3 The whistler-blower, complainant or whistleblowing reporter's will not be subject to termination, suspension, reassignment of position or job or disciplinary action as long as the whistleblowing report is not deliberately filed with false information.

5.2.2 In case the whistle-blower, or complainant, or whistleblowing reporter is an external party, supplier or business partner:

5.2.2.1 The Company and/or its subsidiaries will protect the whistle-blower, complainant or whistleblowing reporter from reprisals.

5.2.2.2 The Company and/or its subsidiaries will not disclose the whistle-blower, complainant or whistleblowing reporter's name and information in the whistleblowing report or any relevant information to any irrelevant parties except as required by law.

5.3 Investigation process of whistleblowing and complaint, penalty and reporting

5.3.1 Case acceptance regarding whistleblowing/complaint: Internal Audit Office or other assigned function will proceed with the whistleblowing report as follows:

- (i) To gather factual information and verify information and evidence regarding whistleblowing and complaint.
- (ii) To refer the case to the investigation and disciplinary action process, if the whistleblowing/complaint case is well-founded.

5.3.2 Investigation, disciplinary action and reporting: the process will be conducted according to the regulation on disciplinary investigation and action of the Company.

6. Penalty

The personnel of the Company who conduct whistleblowing or file a complaint in good faith will not be subject to any disciplinary action by the Company and/or its subsidiaries. However, any whistleblowing or complaint has been found to deliberately raise false and/or malicious allegations, if being conducted whistleblowing or filed a complaint by the personnel, will be subject to the investigation and procedure according to the human resource management regulation. If whistleblowing which is conducted by an external party, supplier or business partner may cause damage to the Company and/or its subsidiaries, a legal action may be filed.

7. Policy Review

The Internal Audit Office shall review this Policy on annual basis or earlier as appropriate. If the Policy is found to be unsuitable with the nature of business operations of the Company and/or its subsidiaries, the Internal Audit Office shall revise and present the revised policy to the Audit Committee before proposing to the Board of Directors for approval.

This Whistleblowing Policy was approved by the Board of Directors on 1 February 2023.