

# **Whistleblowing Policy**

Mc Group Public Company Limited

**Effective on November 9, 2023**

**Definitions**

Mc Group	Refers to	Mc Group Public Company Limited, including its subsidiaries, joint ventures, other companies under its control, and business representatives.
Directors	Refers to	The Company's directors and directors of subcommittees
Executives	Refers to	Chief Executive Officer, Chief Officers, Senior Directors, Directors, Assistant Directors, and Managers.
Employees	Refers to	Employees from the level of Assistant Manager or equivalent and below, including full-time, temporary, and contract employees.
Stakeholders	Refers to	Individuals and/or legal entities involved in the Company's business operations, including shareholders, employees, partners, competitors, customers, creditors, as well as communities and society.
Supervisors	Refers to	Management-level employees or managers whom the complainant trusts to report complaints to, in accordance with this regulation.
Regulations	Refers to	Policies, procedures, provisions, or rules under any other name that are enforceable and applicable to the Company's operations.
Misconduct	Refers to	Comprises two main components: <ol style="list-style-type: none"> <li>1. Any act or behavior that violates or fails to comply with laws, company regulations, rules, or the Company's business ethics.</li> <li>2. Acts of corruption or abuse of authority to obtain undue benefits, such as giving or receiving bribes in any form. This includes offering, promising, granting, pledging, or demanding money, property, power, position, or the improper use of existing assets to or from government officials, government agencies, private organizations, or any responsible party, whether directly or indirectly, in order for them to act or refrain from acting. This is done to gain or maintain benefits for oneself, family, friends, or related parties, except in cases where the law, regulations, announcements, customs, local traditions, or commercial practices allow.</li> </ol>

## **2. Objectives**

Mc Group ("the Company") is committed to conducting business with integrity, responsibility, transparency, and honesty to ensure that its operations are efficient and create value for all stakeholders in accordance with good corporate governance principles.

The Company provides opportunities for directors, executives, employees, and stakeholders to provide information, submit complaints, or report violations of the law, financial reporting inaccuracies, deficiencies in internal control systems, or breaches of the Company's business ethics through designated channels. Additionally, the Company has implemented measures to protect those who provide information, submit complaints, or report violations, ensuring that they will not face any direct or indirect repercussions for doing so.

## **3. Eligibility to File Complaints**

- 3.1 Any individual who has information or reasonably suspects, in good faith, whether they have been personally affected or not, that a director, employee, or any person acting on behalf of the Company has engaged in misconduct or behavior that may suggest misconduct.
- 3.2 Any individual who has been subjected to retaliation, threats, or disciplinary actions, such as demotion, suspension, termination, or unfair treatment related to employment, as a result of filing a complaint, providing information, or assisting in the investigation, inquiry, or fact-finding process for the complaint recipient. This also includes those involved in legal proceedings, serving as witnesses, testifying, or cooperating with the courts or government authorities.

Complainants may choose to remain anonymous if they believe revealing their identity could cause harm to themselves. However, they must provide sufficient factual details or clear evidence that reasonably suggests a violation of the law, regulations, Company rules, or business ethics has occurred. Nonetheless, choosing to disclose their identity may expedite the complaint resolution process.

## **4. Recipients of Complaints**

- 4.1 Chairman of the Audit Committee
- 4.2 Chief Executive Officer
- 4.3 Assistant Director of Internal Audit
- 4.4 Direct Supervisor

## 5. Channels for Filing Complaints

Complainants may submit their complaints to the designated recipients listed in section 4 through the following channels:

5.1 Submit a written complaint directly.

5.2 By mail: Addressed to

The complaint recipient as listed in section 4

Mc Group Public Company Limited

448, 450 On Nut Road, Prawet Subdistrict, Prawet District, Bangkok  
10250

5.3 Via electronic mail (E-mail):

1. Chairman of the Audit Committee: [uditcommittee@mcgroupnet.com](mailto:uditcommittee@mcgroupnet.com)
2. Chief Executive Officer: [james.a@mcgroupnet.com](mailto:james.a@mcgroupnet.com)
3. Assistant Director of Internal Audit: [somporn.u@mcgroupnet.com](mailto:somporn.u@mcgroupnet.com)
4. Direct Supervisor

5.4 Complaint Center

1. E-mail: [mccontactcenter@mcgroupnet.com](mailto:mccontactcenter@mcgroupnet.com), LineOA: mcjeans, Instagram: mcjeans, DL-Complain@mcgroupnet.com, Facebook: mcjeans, Facebook: mcshop.com, [www.mcshop.com](http://www.mcshop.com)
2. By mail: Addressed to Complaint Center (HR), Mc Group Public Company Limited, 448, 450 On Nut Road, Prawet Subdistrict, Prawet District, Bangkok 10250
3. By phone: Through Call Center at 020 666 999

If the complaint is submitted through recipients other than the Chairman of the Audit Committee, a copy of the e-mail (cc) should be sent to the Chairman of the Audit Committee.

In cases where the complainant chooses not to disclose their name, sufficient factual details or evidence must be provided to reasonably suggest that a violation of the law, regulations, Company rules, or business ethics has occurred.

All complaints will be treated as confidential. The complainant may use more than one channel for filing the complaint and is not required to disclose their identity. However, if the complainant's identity is revealed, the Company will be able to provide updates on the progress or further details regarding the complaint.

## 6. Procedures for Fact-Finding Investigations

- 6.1 The complaint recipient is responsible for conducting fact-finding investigations or may assign a trusted individual or department to carry out the investigation. If the complaint involves substantial evidence or affects multiple departments, the recipient or the assigned party shall present recommendations to the Executive Committee for the appointment of a fact-finding committee.
- 6.2 The complaint recipient or the assigned party may invite any director, executive, employee, or stakeholder to provide information or request any relevant documents to aid in the investigation.
- 6.3 If the investigation finds the complaint to be valid, the Company will take the following actions

- a. For complaints related to violations of laws, regulations, Company rules, or business ethics, the recipient or the assigned party will submit the findings, along with recommendations for appropriate corrective actions, to the relevant authority within the Company for consideration.
- b. For serious complaints, such as those that impact the Company's reputation, financial standing, or conflict with the Company's business policies, or those involving senior management, the matter will be referred to the Executive Committee, Audit Committee, or the Board of Directors for consideration.
- c. In cases where the complaint has caused undue harm to any individual, the recipient or the assigned party will propose appropriate and fair remedies to the Executive Committee.
- d. If there is clear evidence that the complainant intentionally filed a false or defamatory complaint with the aim of causing harm or provocation in bad faith, the Company will take measures to protect the reputation of the accused party as follows:
  - If the complainant is an employee, the Company will conduct an investigation and consider disciplinary action in accordance with the Company's human resource management regulations.
  - If the complainant is an external party and the Company has suffered damage, the Company may consider pursuing legal action.

## **7. Protection for Complainants, Accused, and Related Parties**

- 7.1 The complainant may choose to remain anonymous if they believe that revealing their identity could cause harm. However, they must provide sufficient factual details or evidence that reasonably suggests a violation of laws, regulations, Company rules, or business ethics has occurred. If the complainant reveals their identity, it will allow the complaint to be processed more quickly.
- 7.2 All parties involved in the complaint process must keep the information confidential, considering the safety and potential harm to the complainant, the source of the information, or other involved persons. Disclosure of information is only allowed when necessary according to these procedures or as required by law. Intentional breaches of confidentiality will result in disciplinary action and/or legal proceedings.
- 7.3 If the complainant or the accused feels unsafe or fears potential harm, they may request the Company to implement appropriate protective measures. The Company may also provide such protection without a formal request if there is a risk of harm or danger.
- 7.4 Any employee who treats others unfairly, discriminates, or causes harm as a result of someone filing a complaint, providing information, reporting misconduct, or participating in legal or investigative processes, including providing testimony or cooperating with courts or government agencies, will be subject to disciplinary action. If such behavior constitutes a legal violation, it may also result in legal consequences.
- 7.5 Those who suffer harm will be provided with appropriate and fair remedies.

**8. Communication to Stakeholders**

The complaint recipient or the Internal Audit Department is responsible for informing the complainant of the investigation results (if the complainant has revealed their identity) and reporting the outcome to the Chief Executive Officer and the Audit Committee accordingly.

**9. Review and Dissemination of the Policy**

The Company will review this policy annually or as necessary to ensure alignment with changes in business practices, regulations, and legal requirements. Any amendments must be promptly made, and the implementation of the policy must be monitored, including providing guidance and disseminating the policy to relevant stakeholders through the Company's communication channels.

This policy is effective from November 9, 2023, onwards.

*-Signed by-*

( Mrs. Kaisri Nuengsigkapan )  
Chairman of the Board of Directors