

To ensure that DTGO business operations are conducted transparently, fairly, and accountably, DTGO has stipulated guidelines on whistleblowing and complaints and the protection of whistleblowers, complainants, and informants, along with confidentiality measures, which shall be adhered to by all members of the organization, as follows:

### **1 Scope of Whistleblowing or Complaint Regulations**

The regulations apply whenever a member of the organization considers that he or she might have encountered or become aware of any of the following actions or behaviors:

- 1.1** Any action that violates the law, policy, rules, code of conduct, and regulations of DTGO.
- 1.2** Any action that is within the scope of fraud or corruption.
- 1.3** Exploitation of or negligence to exercise authority for personal benefit or to benefit family or others.
- 1.4** Any action such as persecution, demotion, punishment, or any act that damages the person targeted directed against whistleblowing, the provision of information, collaboration in a factual investigation, or refusal to engage in fraudulent or corrupt activities.

### **2 Roles and Responsibilities of DTGO members**

- 2.1** Any members of the organization or stakeholders who encounter or detect or acknowledge any actions or behaviors stated in Clause 1. shall not disregard or neglect to notify or report such matters through the specified channels.
- 2.2** All members of the organization shall collaborate in the investigation and provision of facts whenever any actions or behaviors stated in Clause 1. are detected.

### **3 Channels for Whistleblowing or Complaint**

Prescribed persons who are entitled to receive whistleblowing or complaint matter are as follows:

- Chairman of the Executive Committee DTGO
- Chairman of the Audit Committee DTGO
- Group Chief Executive Officer DTGO
- Head of Internal Audit DTGO

If the following persons are the persons being complained against, the channels for whistleblowing or complaint shall be as follows:

- If the complaint is against a member of the Audit Committee of DTGO, the whistleblowing or complaint shall be made to the Chairman of the Executive Committee of DTGO.
- If the complaint is against a member of the Executive Committee of DTGO or executive vice president level or higher, the whistleblowing or complaint shall be made to the Chairman of the Audit Committee of DTGO.
- If the complaint is against the Head of Internal Audit, the whistleblowing or complaint shall be made to the Group Chief Executive Officer of DTGO.

By the following methods:

- In person
- By phone: 02-742-9141
- Through external website: <https://whistleblowing.dtgsiam.com>
- Through internal website: <https://intranet.dtgsiam.com>
- By email:
  - Chairman of the Executive Committee DTGO : whistleblower\_cm@dtgo.com
  - Chairman of the Audit Committee DTGO : whistleblower\_ac@dtgo.com
  - Group Chief Executive Officer DTGO : whistleblower\_ceo@dtgo.com
  - Head of Internal Audit DTGO : whistleblower\_ia@dtgo.com
- By post:
 

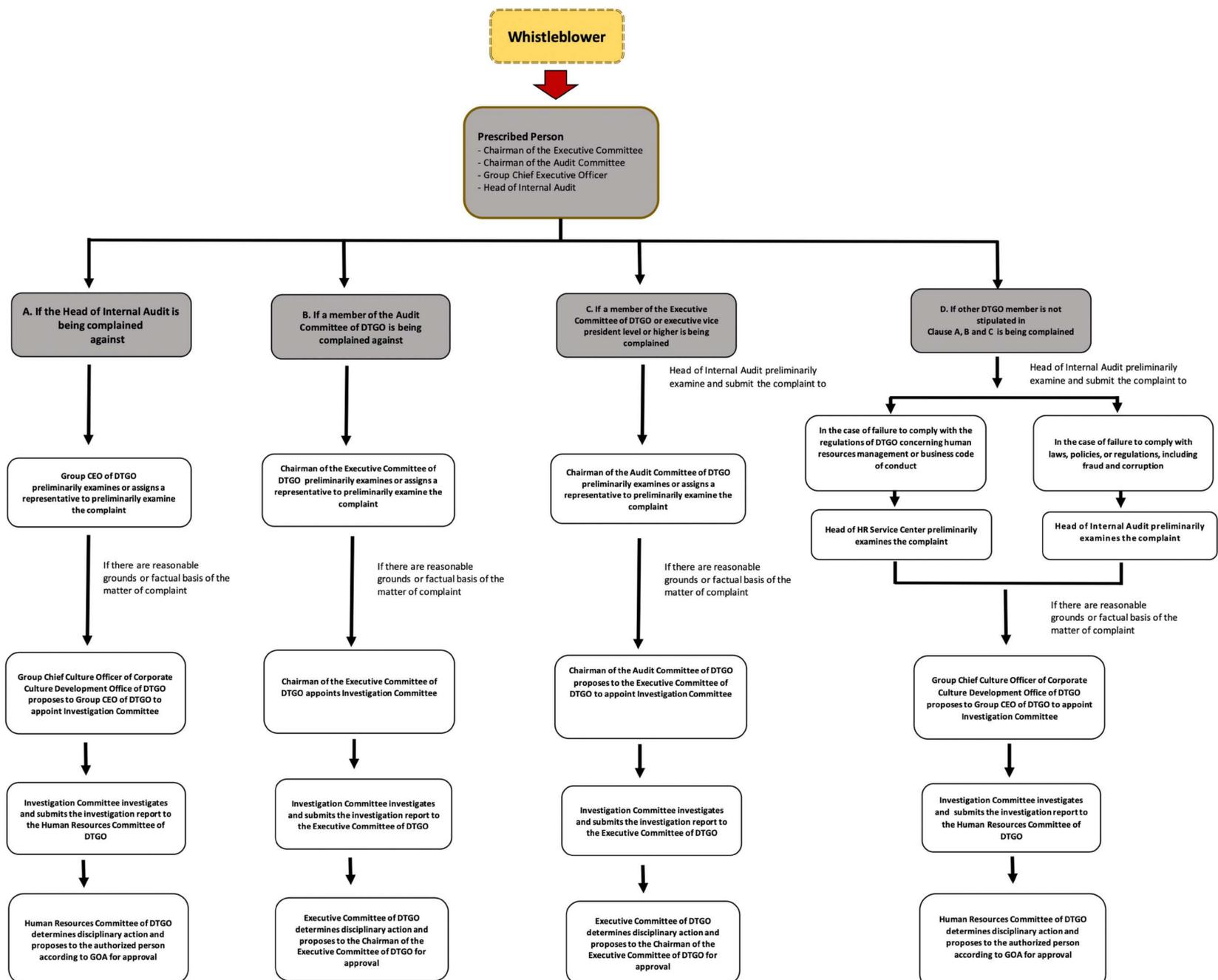
Directly to the intended recipient according to the aforementioned list of prescribed persons.

DTGO Corporation Limited  
 695 Soi Sukhumvit 50, Sukhumvit Road, Phra Khanong Sub-district,  
 Khlong Toei District, Bangkok 10260

Remarks:

- The investigation of complaints will be based on reliable facts.
- Fraudulent and anonymous whistleblowing or complaints may impede factual investigation

#### 4 Procedures upon the Receipt of a Whistleblowing or Complaint



- 4.1 If the Head of Internal Audit is being complained against, the recipient shall submit the complaint to the Group Chief Executive Officer of DTGO to preliminarily examine or assign a representative to preliminarily examine the complaint.
  - 4.1.1 If there are reasonable grounds or a factual basis for the matter of complaint, such complaint shall be proposed to the Group Chief Culture Officer of the Corporate Culture Development Office of DTGO to be subsequently proposed to the Group Chief Executive Officer of DTGO for appointment of the Investigation Committee.
  - 4.1.2 The Investigation Committee shall investigate and submit the investigation report to the Human Resources Committee of DTGO.
  - 4.1.3 The Human Resources Committee of DTGO shall determine the disciplinary action and propose to the authorized person according to DTGO Grant of Authority Manual (GOA) for approval.
- 4.2 If a member of the Audit Committee of DTGO is being complained against, the recipient shall submit the complaint to the Chairman of the Executive Committee of DTGO to preliminarily examine or assign a representative to preliminarily examine the complaint.
  - 4.2.1 If there are reasonable grounds or a factual basis of the matter of complaint, such complaint shall be proposed to the Chairman of the Executive Committee of DTGO for appointment of the Investigation Committee.
  - 4.2.2 The Investigation Committee shall investigate and submit the investigation report to the Executive Committee of DTGO.
  - 4.2.3 The Executive Committee of DTGO shall determine the disciplinary action and propose to the Chairman of the Executive Committee of DTGO for approval.
- 4.3 If a member of the Executive Committee of DTGO or executive vice president level or higher is being complained against, the recipient shall submit the complaint to the Head of Internal Audit, whereby the Head of Internal Audit shall propose such complaint to the Chairman of the Audit Committee of DTGO to preliminarily examine or assign a representative to preliminarily examine the complaint.
  - 4.3.1 If there are reasonable grounds or a factual basis for the matter of complaint, it shall be proposed to the Chairman of the Audit Committee of DTGO to propose to the Executive Committee of DTGO for appointment of the Investigation Committee.
  - 4.3.2 The Investigation Committee shall investigate and submit the investigation report to the Executive Committee of DTGO.
  - 4.3.3 The Executive Committee of DTGO shall determine the disciplinary action and propose to the Chairman of the Executive Committee of DTGO for approval.

- 4.4 In the case of other DTGO member who is not stipulated in Clause 4.1, 4.2 or 4.3 is being complained against, the recipient of the complaint shall submit it to the Head of Internal Audit.
- 4.4.1 The Head of Internal Audit shall preliminarily examine the clarity and sufficiency of the evidence and submit qualifying complaints:
- A. In the case of a complaint on violation of or incompliance with the regulations of DTGO concerning human resources management or business code of conduct, the complaint shall be submitted to Head of HR Service Center, Department of Corporate Culture Development Office for preliminary examination of the complaint;
- B. In the case of a complaint on incompliance with laws, policies, or other regulations, or engagement in fraud or corruption, the complaint shall be submitted to the Head of Internal Audit for preliminary examination of the complaint.
- 4.4.2 If there are reasonable grounds or a factual basis for the complaint as stated in Clause A, or Clause B, such complaint shall be submitted to the Group Chief Culture Officer of Corporate Culture Development Office of DTGO to be subsequently proposed to the Group Chief Executive Officer of DTGO for appointment of the Investigation Committee.
- 4.4.3 The Investigation Committee shall investigate and submit the investigation report to the Human Resources Committee.
- 4.4.4 The Human Resources Committee shall determine the disciplinary action and propose to the authorized person according to DTGO Grant of Authority Manual (GOA) for approval.
- 4.5 The General Secretary of Human Resources Committee of DTGO or the General Secretary of the Executive Committee of DTGO shall submit the disciplinary action report to the Head of Internal Audit to inform the complainant and the corresponding recipient regarding the results of the complaint as deemed necessary and appropriate.
- 4.6 The Head of Internal Audit shall be responsible for reporting the results of the complaint and disciplinary proceedings to the Executive Committee, Audit Committee, and Group Chief Executive Officer of DTGO. In the event of misconduct of business code of conduct, fraud, or corruption, the results of the complaint and disciplinary proceedings shall be additionally reported to the Department of Corporate Governance.

## 5 Protection of Whistleblowers or Complainants

- 5.1 DTGO provides protection to whistleblowers or complainants or informants, or persons who refuse to engage in fraudulent or corrupt activities relating to DTGO, from harm, danger, or injustice as a result of such collaboration.
- 5.2 DTGO will protect the information of whistleblowers, complainants, or informants and will keep such information confidential by limiting the disclosure of information to only the persons who are responsible for factual investigation. Any misuse or inappropriate disclosure of such information shall be deemed a violation of the regulations and misconduct.

- 5.3 DTGO will not demote, punish, or cause negative effects to the executives or members of the organization who refuse to engage in fraudulent or corrupt activities, even if such action results in the loss of business opportunities.
- 5.4 In the event that the whistleblower, complainant, or informant believes that he/she may be in danger or may incur damage to life or property, he/she may request DTGO to provide appropriate protection.

## 6 Disciplinary Action

- 6.1 Any members of the organization who disregard or neglect to comply with these regulations shall be deemed to have committed an act of misconduct.
  - 6.2 Any members of the organization who displays behaviors within the scope persecution, intimidation, disciplinary action, or malpractice towards the whistleblowers or complainants or informants or persons relating to the execution of these regulations, as a result of whistleblowing or complaints, shall be deemed to have committed an act of misconduct.
  - 6.3 In the case that non-members of the organization persecute or intimidate the whistleblowers or complainants or informants or persons relating to the execution of these regulations, and cause damage to these persons or DTGO, DTGO shall reserve the right to proceed according to law as deemed appropriate.
  - 6.4 Any members of the organization who reports wrongdoings or complaints that are false or lack factual evidences, and have the intention to persecute, threaten, or cause others to receive damage or disciplinary action, shall be deemed to have committed an act of misconduct. In the case that such persons are not members of the organization, DTGO shall reserve the right to proceed according to law as deemed appropriate.
-