

(Translation)

**S&P Syndicate Public Company Limited**  
**Whistle Blowing Policy**

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S&P Syndicate Public Company Limited and its subsidiaries recognize the importance of good corporate governance principles, and are committed to conducting business with honesty, integrity, transparency, and anti-corruption in any form. The company has therefore established this policy for filing complaints and providing whistleblowing information to support and provide a channel for directors, executives, and employees of the company and its subsidiaries, as well as stakeholders, to report or file complaints if they see or suspect illegal acts, or actions that violate laws, regulations, and the code of conduct for employees, in order to help correct, or proceed with appropriate, transparent, and efficient actions.

**Objectives**

1. To ensure that the process of receiving complaints and reports of corruption, or non-compliance with laws, regulations, and the code of conduct for directors, executives, and employees, is well-structured, efficient, and in line with good corporate governance principles.
2. To ensure that company personnel and any person acting on behalf of the company conduct business with integrity, transparency, fairness, and accountability.
3. To provide channels for reporting or filing complaints about illegal acts, ethical violations, or behavior that may indicate corruption or misconduct by personnel within the organization, from both employees and other stakeholders, to allow stakeholders to participate in protecting the company's interests.
4. To ensure that whistleblowers or complainants who act in good faith receive appropriate and fair protection.

**Definitions**

1. **Misconduct:** refers to any act or omission by S&P Syndicate personnel that violates laws, regulations, the code of conduct for directors, executives, and employees, as well as various other rules and regulations.
2. **Personnel:** refers to the directors, executives, and employees of the company.
3. **The Company:** refers to S&P Syndicate Public Company Limited and its subsidiaries, where a subsidiary is defined as a subsidiary according to the company's consolidated financial statements.
4. **Complainant:** refers to any person, company personnel, or various stakeholders who report any misconduct.

## **Right to File a Complaint**

1. Any person or company personnel who witnesses an act that violates laws, company regulations, or the business code of conduct.
2. Employees who are bullied, threatened, or disciplined, such as a salary reduction, suspension, termination, or unfair discrimination related to their employment as a result of filing a complaint, providing information, or intending to provide information, or assisting in the investigation or fact-finding process for the complaint recipient, including legal action, being a witness, giving a statement, or any cooperation with a court or government agency.
3. In cases where there is clear and sufficient evidence that the complainant has acted in bad faith in reporting or accusing the person being complained about, the company will need to take action to protect the reputation of the person being complained about, as follows:
  - 3.1 If the complainant is company personnel, an investigation will be conducted to consider disciplinary action in accordance with company regulations.
  - 3.2 If the complainant is an external person and the company has been harmed, the company may take legal action against the complainant if such act is illegal.

## **Scope of Complaints or Reports**

1. Company personnel or any person acting on behalf of the company may be subject to a complaint under this policy if misconduct occurs.
2. The company will not accept complaints in the following cases:
  - 2.1 Matters for which the Shareholders' Meeting, the Board of Directors, the Audit Committee, the Risk Management Committee, the Executive Committee, or the management team have already made a final resolution within their scope of authority.
  - 2.2 Matters that are being litigated in court, or for which a court has already issued a final judgment or order.
  - 2.3 Complaints that do not specify a witness, or do not have enough reports, evidence, or clear fraudulent or wrongful acts to allow for further factual investigation.
  - 2.4 Matters that have already been considered by relevant or authorized agencies, or for which a fair and final ruling has been made, and there is no new, material evidence.
3. The complaint to be considered must clearly state how it is a fraudulent act or a non-compliance with laws, regulations, or a code of conduct, such as criminal law, labor law, employee regulations, or procurement regulations, etc. The information or evidence must be sufficient to be credible that the violation has actually occurred.

## **Channels for Whistleblowing or Complaints**

Channels for both company personnel and external stakeholders to file complaints, either by name disclosure or anonymously, in writing, to the company are as follows:

By mail: Internal Audit Office  
S&P Syndicate Public Company Limited  
2034/100-103 Ital-Thai Tower, 23rd Floor  
New Phetchaburi Road, Bangkok Subdistrict  
Huai Khwang District, Bangkok 10310

By email: [whistleline@snpfood.com](mailto:whistleline@snpfood.com)

These channels for receiving reports and complaints are also disclosed in the annual report and on the company's website.

In addition to the aforementioned channels, employees can also inquire or submit complaints if they suspect a violation or non-compliance with the code of conduct through the following channels:

- A trusted supervisor at any level
- Director of Human Resources
- The Audit Committee
- Any member of the Board of Directors

## **Measures to Protect Whistleblowers, Complainants, and Those Who Cooperate in Fact-Finding**

Whistleblowers, complainants, and those who cooperate in fact-finding will be protected according to the following principles:

1. Whistleblowers, complainants, and those who cooperate in fact-finding can choose to remain anonymous if they believe that disclosing their identity would lead to insecurity or any harm. However, if they disclose their identity, the company will be able to report progress, clarify facts, or mitigate harm more conveniently and quickly.
2. The company will not disclose the name, surname, address, image, or any other information that can identify the whistleblower, complainant, and those who cooperate in the fact-finding, and will proceed with an investigation to determine if there is a factual basis.
3. The complaint recipient must keep the relevant information confidential and will only disclose it as necessary, with consideration for the safety and harm to the whistleblower, complainant, those who cooperate in fact-finding, the source of the information, or related individuals.
4. In cases where the whistleblower, complainant, or those who cooperate in fact-finding believe they may be unsafe or may suffer harm, they may request that the company establish appropriate protective measures. The company may also establish protective measures without a request if it sees a trend of potential harm or unsafety.
5. Those who suffer harm will receive relief through a process that is appropriate and fair.

6. If the whistleblower, complainant, or those who cooperate in fact-finding have reported concerns or asked questions in good faith, the company may not use it as a pretext for any action detrimental to that employee's employment, whether it is a job transfer, demotion, suspension, or cutting of deserved benefits. Furthermore, no person is allowed to retaliate against the whistleblower, complainant, or those who cooperate in fact-finding.

### **Process for Handling a Complaint After Receiving It**

1. The complaint recipient will conduct a fact-finding and information-gathering investigation, or may assign a trusted person or department to investigate the facts. The Internal Audit Office must be informed in writing beforehand. The initial consideration and conclusion of the facts will take approximately 30-60 days (depending on the complexity of the fact-finding). If the complainant has disclosed their identity, they will be notified within 7 business days from the date of the conclusion.
2. In a case that is complex and involves multiple departments, the complaint recipient must consider appointing a "Fact-Finding Committee" to investigate and gather facts as appropriate. The committee should consist of at least 3 people from various departments related to the complaint who do not have a direct stake in the matter.
3. If the investigation finds the complaint to be true, the company will take the following actions:
  - 3.1 In cases where the complaint concerns a violation of laws, regulations, or the code of conduct, the matter will be submitted to the Human Resources Department to coordinate the appointment of a "Fact-Finding Committee." The matter will be submitted with an opinion and correct guidelines for action, and a copy of the details will be sent to the Internal Audit Office for their information.
  - 3.2 In cases of a significant nature, such as those that affect the company's reputation, image, or financial status, conflict with the company's business policy, or involve high-level executives, the matter will be submitted to the Audit Committee or the Board of Directors for consideration.
  - 3.3 In cases where the complaint causes harm to anyone, methods for appropriate and fair compensation will be proposed to the affected party.

### **Summary and Reporting of Results**

The complaint recipient or the "Fact-Finding Committee" (as the case may be) must report the result of the consideration to the whistleblower (if the whistleblower has disclosed their identity) within 7 business days from the date of the conclusion, and also report a summary of the actions taken regarding the complaint to the Audit Committee for their information. If more than 30 days have passed since the complaint was filed and there has been no response from the complaint recipient, the complainant can file an additional complaint through the other specified channels.

**Approved by:**

Corporate Governance and Sustainability Committee Meeting No. 3/2567 on December 4, 2567

Board of Directors Meeting No. 6/2567 on December 11, 2567

This policy is effective as of December 11, 2567

(Mrs. Patara Sila-On)

Chairperson of the Board of Directors