HaadThip Public Company Limited
บริษัท หาดทิพย์ จำกัด (มหาชน)
87/1 Kanchanavanich Rd., T.Banpru Hatyai, Songkhla 90250 Thailand
87/1 ถ.กาญจนวณิช ต.บ้านพรุ อ.หาดใหญ่ จ.สงขลา 90250
: +66 7 421 0008-18 : +66 7 421 0006-7 : personnel@haadthip.com

Whistleblowing and Complaint Handling Policy and Guidelines	Effective Date: 20 August 2026
	Revision: 3
Responsible Unit: Corporate Governance	Document No : CG & Risk/08

Whistleblowing and Complaint Handling Policy and Guidelines

HaadThip Public Company Limited and its subsidiaries ("Company") are committed to maintaining corporate governance practices for all stakeholders, as set forth in the Company's Corporate Governance Policy. To support this commitment, the Company has established corporate governance measures and provides channels through which all stakeholders may submit complaints and concerns via the Company's designated communication channels.

This Whistleblowing and Complaint Handling Policy has been established to provide guidance framework for the receipt, handling, management, and protection of complaints and whistleblowing reports submitted by the Company's stakeholders. The Policy enables stakeholders to report any suspected misconduct, irregularities, or inappropriate practices relating to the Company's business operations, corporate governance, ethical conduct, or violations of applicable laws, regulations, and the Company's rules and policies. The Company is committed to ensuring that all complaints and whistleblowing reports are managed in an effective, transparent, and accountable manner. All information received through such reporting channels will be treated with the utmost confidentiality and handled in accordance with the Company's confidentiality and data protection requirements.

Accordingly, the Company has established this Whistleblowing and Complaint Handling Policy with the following objectives:

1. To ensure that the processes for receiving complaints and whistleblowing reports concerning, but not limited to, fraud, corruption, misconduct, violations of the Company's rules and regulations, actions causing damage to the Company or its stakeholders, as well as complaints arising from the business operations of the Company or the conduct of its personnel, are managed through appropriate and effective procedures in accordance with the principles of good corporate governance.

2. To ensure that directors, executives, employees, and any persons acting on behalf of the Company conduct business with integrity, transparency, fairness, and accountability in compliance with applicable laws, the principles of good corporate governance, business ethics, and the Company's policies and regulations.

3. To provide stakeholders with appropriate channels which they may submit complaints or whistleblowing reports concerning the conduct of Company's directors, executives, employees, or any person acting on behalf of the Company that violates or be inconsistent with the principles of good corporate governance, business ethics, applicable laws, or the Company's policies through the complaint and whistleblowing channels designated by the Company.

4. To ensure that complainants, whistleblowers, and any persons who cooperate with the Company in good faith are afforded appropriate protection and are safeguarded against any form of retaliation, intimidation, discrimination, harassment, or any other form of unfair treatment arising from their complaint or whistleblowing report.

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1. Definitions

"Personnel" means the Chairman of the Board, Directors, Executives, and employees at all levels of the Company.

"Misconduct" means any act or omission by the Company's personnel that violates the Company's Charter, Code of Business Conduct and Ethics, policies, rules, regulations, work rules, or any applicable laws relating to the Company's business operations.

"Fraud and Corruption" means any act undertaken to obtain an unlawful or improper benefit for oneself or others, including bribery in any form, whether by offering, promising, giving, authorizing, requesting, soliciting, or accepting money, property, or any other benefit, directly or indirectly, to or from a government official, government agency, private entity, or any person performing duties, for the purpose of inducing such person to perform or refrain from performing any act in order to obtain or retain business, secure an improper business advantage for the Company, or obtain or retain any other inappropriate business benefit.

"Confidential Information" means information relating to the complainant, whistleblower, respondent, witnesses, evidence, and any information associated with an investigation, which the Company is required to keep confidential and disclose only to persons with a legitimate need to know or as required by applicable law.

"Complainant/Whistleblower" means any person who, in good faith, submits a complaint or whistleblowing report, whether anonymously or by disclosing their identity, after being affected by, witnessing or becoming aware of misconduct or an incident, through the Company's designated complaint or whistleblowing channels.

"Respondent" means any person who is alleged or identified as being involved in a complaint or whistleblowing report.

"Complaint and Whistleblowing Recipient" means the individual(s) or department(s) appointed by the Chief Executive Officer (CEO) to receive complaints and whistleblowing reports and to administer the Company's complaint and whistleblowing management process.

"Identified Report" means a complaint or whistleblowing report in which the complainant or whistleblower discloses information that enables the Company to identify and contact the individual, such as their name, surname, department, contact details, or any other identifying information, for the purpose of requesting additional information, clarifying facts, or communicating the outcome of the investigation.

"Anonymous Report" means a complaint or whistleblowing report in which the complainant or whistleblower does not disclose any information that could identify them. The Company will consider and investigate such reports provided that the information or supporting evidence submitted is sufficiently detailed to enable a factual investigation.

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2. Policy Scope

This Policy has been established to encourage the Company's stakeholders to submit complaints or whistleblowing reports regarding fraud, corruption, or any other misconduct, as well as to disclose information concerning any adverse impacts arising from the Company's business operations or any violations of applicable laws, the Company's policies, rules and regulations, or the Company's Code of Business Ethics. For the purposes of this Policy, complaints and whistleblowing reports are classified into the following two categories:

2.1 Complaint

A **Complaint** refers to the submission of a grievance, objection, or expression of dissatisfaction regarding the Company's operations, services, business practices, products, personnel, or other activities that may affect the rights, interests, or satisfaction of the complainant, or involve Company's failure to meet expected standards, commitments, or agreed requirements. The purpose of a complaint is to enable the Company to investigate the matter and, where appropriate, take corrective actions, improve its operations, or provide suitable remedies.

Examples of complaints include:

1. Services provided by the Company do not meet customer expectations.
2. Product or service quality issues.
3. Employee conduct or performance.
4. Delays in service delivery.
5. Environmental, occupational health, or workplace safety concerns.
6. Community impacts arising from the Company's operations.
7. Human rights violations.
8. Personal data protection (PDPA) violations.
9. Suggestions for improving the Company's operations.
10. Any other issues related to the Company's business operations.

2.2 Whistleblowing

Whistleblowing refers to the disclosure or reporting of information, raising of concerns, or suspicions regarding any act that may involve violations of law, fraud, corruption, misconduct, abuse of authority, or breaches of the Company's Code of Business Conduct and Ethics, policies, or regulations, which the whistleblower has witnessed or has reasonable grounds to believe has occurred that such conduct has occurred and may result in harm to the Company, its stakeholders, or the public.

A whistleblower is not required to be a person directly affected by the reported matter and may choose to disclose or withhold their identity. The Company shall provide appropriate protection to whistleblowers in accordance with this Policy. The purpose of whistleblowing is to enable the Company to investigate the reported matter, establish the relevant facts, and take appropriate corrective or disciplinary actions, where necessary.

Examples of whistleblowing matters include:

1. Fraud, embezzlement, or financial misconduct.
2. Bribery and corruption.
3. Conflicts of interest.

4. Violations of applicable laws or regulatory requirements.
5. Violations of the Company's policies, regulations, or Code of Business Conduct and Ethics.
6. Falsification of documents or accounting and financial records.
7. Concealment of material information.
8. Abuse or misuse of authority.
9. Harassment, discrimination, or workplace bullying that violates the Company's policies.
10. Any other conduct that may cause damage to the Company or undermine the principles of good corporate governance.

The Company has established this Complaint and Whistleblowing Policy to provide stakeholders with appropriate channels to express concerns, provide feedback regarding the Company's business operations, and submit complaints or whistleblowing reports relating to any act or omission that may result in unfair treatment, violations of applicable laws, fraud, corruption, misconduct, or breaches of the Company's Code of Business Ethics, policies, or regulations. Whistleblowers may choose to disclose or withhold their identity. Anonymous reports will not prevent the Company from considering or investigating the reported matter, provided that the information submitted is sufficiently clear, credible, and adequate to support a fact-finding process.

The Company shall treat the identity of complainants and whistleblowers, as well as all information received through the complaint and whistleblowing channels, with the strictest confidentiality. The Company is committed to implementing appropriate protection measures in accordance with internationally recognized principles and standards for the protection of complainants and whistleblowers.

3. Confidentiality

This Policy is intended to ensure that complainants and whistleblowers have confidence that their reports will be handled promptly, fairly, impartially, and in accordance with the Company's established procedures. The Company is committed to ensuring that any individual who, in good faith, submits a complaint or whistleblowing report will not be subject to retaliation, discrimination, harassment, or any other form of adverse treatment as a result of such reporting.

The identity of complainants and whistleblowers, together with any information that could reasonably identify them, shall be kept strictly confidential and disclosed only on a need-to-know basis or where required by applicable law. Complainants and whistleblowers are encouraged to exercise due care in submitting reports and to ensure that the information and supporting evidence provided are accurate, truthful, and submitted in good faith.

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4. Protection of Complainants and Whistleblowers

The Company shall not engage in, permit, or tolerate any form of retaliation or unfair treatment against any complainant, whistleblower, employee, worker, contractor, or any other individual performing work for or on behalf of the Company who, in good faith, submits a complaint or whistleblowing report.

Such protection includes, but is not limited to, protection against demotion, reassignment, changes to job responsibilities or workplace, suspension, intimidation, harassment, interference with work performance, termination of employment or engagement, or any other action that constitutes unfair or retaliatory treatment arising from the individual's submission of a complaint or whistleblowing report or cooperation in an investigation;

- provides information, cooperates with, or otherwise assists the Company in connection with a complaint, whistleblowing report, or any investigation relating to suspected violations of applicable laws, regulations, the Company's policies, or the Company's Code of Business Ethics; or
- provides statements, submits documents or other evidence, or acts as a witness for the purpose of reviewing, investigating, or establishing the facts relating to any suspected violation of applicable laws, regulations, the Company's policies, or the Company's Code of Business Ethics.

Any person who becomes aware of a complaint, whistleblowing report, or any information relating thereto shall maintain the strict confidentiality of such information and shall not disclose it to any unauthorized person. In doing so, due consideration shall be given to protecting the safety, privacy, and legitimate interests of the complainant, whistleblower, source of information, and any other individual involved.

Confidential information may be disclosed only where such disclosure is necessary for the purpose of conducting an investigation or taking action in accordance with the Company's procedures, or where disclosure is required by applicable law.

Any person who intentionally breaches this confidentiality obligation by improperly disclosing information relating to a complaint or whistleblowing report shall be subject to disciplinary action and/or legal proceedings, as appropriate.

The Company's protection measures for complainants and whistleblowers are aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs), particularly the principles of Protect, Respect, and Remedy, which promote the protection of individuals who raise concerns in good faith, respect for human rights, and access to appropriate remedies where adverse impacts have occurred.

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5. Complaint and Whistleblowing Channels

Any stakeholder of the Company, or any person who has knowledge of or witnesses any actual or suspected misconduct, irregularity, or other matter that may be subject to a complaint or whistleblowing report, may submit such complaint or whistleblowing report through any of the following channels designated by the Company:

Channels

1. **Website:** www.haadthip.com (Contact Us)
2. **Intranet:** HIC (HaadThip Information Center) – Complaint and Whistleblowing
3. **E-mail**
   - **3.1 Complaint** via complaint@haadthip.com
   - **3.2 Whistleblowing** via whistleblowing@haadthip.com
4. **QR Code System**

6. Complaint and Whistleblowing Handling Process and Investigation Timeline

6.1 Upon receipt of a complaint or whistleblowing report, the designated complaint or whistleblowing recipient shall conduct a preliminary review of the information, classify the matter, assess its significance, and verify the relevant facts with the parties concerned, where appropriate. The matter shall then be processed in accordance with the following procedures:

6.1.1 Following the preliminary review of the reported matter, where a whistleblowing report relates to suspected fraud or corruption and there are reasonable grounds to believe that the allegation is substantiated, the designated complaint or whistleblowing recipient shall submit a report to the Chief Executive Officer (CEO) for consideration. The CEO may appoint an investigation committee to conduct a formal fact-finding investigation and determine the appropriate initial preliminary actions.

6.1.2 Where the matter constitutes a complaint or a whistleblowing report relating to other issues, such as product quality, transportation, or customer service, the designated complaint or whistleblowing recipient shall refer the matter to the relevant business unit or function for further investigation and appropriate action in accordance with the Company's established procedures.

6.2 The Complaint/Whistleblowing Recipient shall monitor the progress of the investigation, summarize the investigation results, and submit recommendations to the CEO. The relevant department shall implement corrective or preventive actions in accordance with the CEO's directions.

6.3 The designated complaint or whistleblowing recipient shall prepare and submit a summary report on the handling and resolution of complaints or whistleblowing cases including the actions taken and findings to the CEO for consideration and further direction.

6.4 The Complaint/Whistleblowing Recipient shall ensure that the subject of the complaint or whistleblowing report is informed of the allegations and is given a fair opportunity to explain, present supporting information, or provide evidence to establish his or her innocence in relation to the complaint or whistleblowing report.

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6.5 All complaints and whistleblowing reports shall be addressed as promptly as practicable, taking into consideration the nature, complexity, and severity of the reported matter. Any review or investigation shall be conducted with due care to ensure that the quality, integrity, and completeness of the fact-finding process are not compromised. The preliminary investigation should normally be completed within three (3) weeks from the date the complaint or whistleblowing report is received, unless exceptional circumstances justify an extension.

6.6 All complaints, whistleblowing reports, and information submitted through the designated reporting channels shall be treated as strictly confidential. Such information shall not be disclosed to any unauthorized person under any circumstances.

7. Disciplinary Actions and Penalties

7.1 If the investigation concludes that the subject of a complaint or whistleblowing report has committed alleged misconduct, whether such person is a director, executive, or employee, the individual shall be deemed to have violated the Company's regulations, Anti-Corruption Policy, Charter(s), and/or Code of Conduct, as applicable. The individual shall be subject to disciplinary action in accordance with the Company's disciplinary procedures. Where the misconduct also constitutes a violation of applicable laws, the individual may be subject to civil, criminal, or any other legal liabilities prescribed by law.

7.2 Any person who intentionally or negligently fails to comply with this Policy, or who engages in retaliation, intimidation, harassment, disciplinary action, discrimination, or any other unfair treatment against a complainant, whistleblower, or any person involved in a complaint or whistleblowing case under this Policy, shall be considered to have committed a disciplinary offence. Such person shall be liable for any damages caused to the Company or any affected person and may also be subject to disciplinary measures and legal action in accordance with applicable laws.

This Policy shall become effective on 20 August 2026 onward.

Major General P. Rattakul

(Patchara Rattakul)
Chief Executive Officer