



Whistleblower Policy

The Platinum Group Public Company Limited

Whistleblower Policy

The Platinum Group Public Company Limited and its subsidiaries (the “Company”) emphasize the importance of promoting good corporate governance and operate its business with transparency, integrity and ethics by strictly abiding to the related laws and regulations. The Board of Directors has established the Whistleblower Policy to provide protection and fairness to employees who report incidents, or provide information and leads, of any misconduct, fraud or corruption in the Company.

1. Objectives

- 1.1 To support and enable the Company’s directors, committee members, management, all employees and all stakeholders to file complaints or report incidents, leads or concerns of any misconduct, fraud or corruption which relate to the Company;
- 1.2 To provide reporting channels to file complaints or report incidents which is safe and confidential in order to encourage complainants or whistleblowers to have confidence in the whistleblowing process;
- 1.3 To co-operate, support and give protection, to complainants or whistleblowers, from retaliation in the form of being threatened, being intimidated, changes of position, job or work location, suspension, discharge, trade transactions being on hold, and any treatment which is unfair and damaging to the whistleblower. Therefore, name of complainants or whistleblowers and information provided shall be kept confidential.

2. Definitions

- 2.1 “The Company” means The Platinum Group Public Company Limited and its Subsidiaries.
- 2.2 “Employee” means all personnel of The Platinum Group Public Company Limited and its Subsidiaries including directors, committee members, management, and all employees.
- 2.3 “Complainant” or “Whistleblower” means individual who exposes the information of wrongdoing or fraud or misconduct that he/she discovered.
- 2.4 “Accused” means individual who is accused of wrongdoing or is related to the wrongdoing described in the complaint.

3. Who can make a complaint or report the incident (“blow the whistle”)

- 3.1 The Company’s directors, committee members, management, all employees and all stakeholders and any persons who witness the breaches of laws, regulations, the Company’s articles of association, policies, announcements, business codes of conduct; and fraud or corruption
- 3.2 Employees who were harassed, threatened or facing disciplinary actions like salary reduction, suspension, dismissal or discrimination about employment conditions due to their complaints or providing information

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or planning to provide information or assisting the investigation or gathering information for the complainant or engaging in the prosecution by being a witness, giving deposition or any co-operations to the court or public offices; as well as persons who were affected by the complaints or the whistleblowing.

4. Primary Recipients of the complaints

- 4.1 Immediate supervisor (at any level) whom the complainant trusts
- 4.2 Head of Human Resources Department
- 4.3 Head of Internal Audit Department
- 4.4 Chairperson of the Audit Committee

5. How to file complaints and report incidents

Following are channels and methods for filing complaints and report incidents to the Company.

- 5.1 Filing complaints or whistleblowing can be done verbally or in written;
- 5.2 Submitting to the Company via e-mail address: internalaudit@theplatinumgroup.co.th or;
- 5.3 Mailbox for complaints or whistleblowing provided by the Company or;
- 5.4 Sending a letter to Chairperson of the Audit Committee (who is an independent director) at the following address:

Internal Audit Department

The Platinum Group Public Company Limited

111, PIER 111 Building (M2), 21st Floor, Ratchadamri Road, Lumpini

Pathumwan, Bangkok, 10330

- 5.5 In case that the complainant chose not to disclose his/her name, he/she is required to provide sufficient detailed facts or valid evidence to prove reasonable grounds to believe that there are breaches of laws, regulations, the Company's articles of association and business codes of conduct; or fraud or corruption.

Complaints filing or incidents reporting shall be treated as highly confidential. The complainants or the whistleblower can report to the Company through more than one channel without reveal their identity. However, if their identities are disclosed to the Company, it will be helpful for the Company to report the investigation outcomes or inform any additional information relating to the complaint.

6. Investigation process

- 6.1 The recipient of the complaint shall conduct the investigation by himself or may assign a reliable person or team to investigate, verify the facts and gather evidences as deemed appropriate on the case basis. The investigation shall be done independently and fairly. The Company shall take disciplinary actions or legally prosecute the wrongdoers according to the Whistleblower policy.
- 6.2 In the event that the direct supervisor or the recipient was informed about the wrongdoing and found that the misconduct or fraud actually took place, he/she is required to report to the Internal Audit team within 7 days for further investigation processes. Internal Audit team shall register all complaints and reported incidents and prepare summary report to submit to the Audit Committee and the Executive Committee for acknowledgement at least one time in each quarter.
- 6.3 The complaint recipient or the assigned person shall invite any employees or related parties to give statement or provide information or to submit related documents for further investigation, as deemed appropriate on the case basis.
- 6.4 If the investigation result showed that the complaint issues are substantiated, the Company shall take actions as follows:
- In case that the complaint is about the Company's breaches of laws, regulations, the Company's articles of association and codes of conducts, the complainant report the incident as well as the suggestion of should-be practices for responsible authorities to consider and decide. In case of critical matters which affect the Company's reputation, image or financial status; conflict with the Company's business operation policy; or relate to high level executives, etc., the head of internal audit shall report the case and findings as well as propose the action steps initially to the Audit Committee's preliminary consideration before escalating to the Board of Directors to consider and decide for further action steps as deemed appropriate.
 - In the event that there are damages related to the complaint, the Company shall offer an appropriate solution to recover such damages to victimized parties.
 - Internal Audit Department shall be responsible for reporting the progress and the final findings and resolutions in regarding with whistleblowing to the complainant.

7. Whistle blower protection

- 7.1 The complainant or the whistleblower may choose to submit a report anonymously when he/she considers that the disclosure of identity might be damaging. In such case, the report/complaint is required to include sufficient facts or valid evidence to prove reasonable grounds to believe that there are breaches of laws, regulations, the Company's articles of association and business codes of conduct, or fraud or corruption. However, the complainant is encouraged to disclose his/her identity to fasten the investigation process.

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- 7.2 Related information, for security and whistleblower protection, the Company shall hold confidentiality and disclose the related information on “need to know” basis. The responsible person in each investigation and case handling process shall treat the information relating to the complainant and other sources of information as ‘highly classified’ and not to be disclosed to unrelated parties. Breaching of confidentiality may result in disciplinary action.
- 7.3 The Company shall protect and shall not allow any harassing and threatening to its employees or complainants or whistleblowers and all persons who co-operate and assist in the investigation with good faith.
- 7.4 The Company shall protect and shall not demote, punish or act negatively to employees who refuse to take part in any misconducts or corruptions even when it might cause the Company to loss its business opportunity.
- 7.5 The Company shall protect the complainant or the whistleblower who is a stakeholder of the Company’s trades and any other business transactions even though it might cause the Company to loss its business opportunity.
- 7.6 In the event that the complainant may feel that he/she is not safe or is facing any harmful damages, he/she may request the Company to provide appropriate protections. Also, the Company may voluntarily provide protections without the request if there is a tendency of further damages or insecurities.
- 7.7 Employee, who treated other person unfairly, using inappropriate methods or causing damages to such person, with the motivation from the fact that such person made a complaint, or reported leads of fraudulent activities or breaches of laws, regulations, the Company’s articles of association and codes of conducts, or that such person prosecuted the case, became a witness, gave statements or co-operated with the court of law or other government agencies, will face disciplinary actions and may be punished by laws if the action taken is illegal.
- 7.8 The victimized parties will be indemnified with the method or process which is appropriate and fair.
- 7.9 The complainant or the whistleblower has a right to receive the investigation results if the complaints have no further conduct.

This Whistleblower Policy (Revision) has been reviewed and approved by the Company’s Board of Directors meeting no. 4/2025 on November 11, 2025 with effective date from November 11, 2025 onwards.

-*Mr. Palakorn Suwanrath*-
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Chairman of the Board of Directors
Date November 11, 2025