

Bangkok Ranch Public Company Limited

Policy on Protection and Fairness for Employees Who Inform on or Disclose of Wrongful Conduct or Non-Compliance with Laws, Rules and Regulations, the Company's Articles of Association, and the Code of Conduct (Whistleblower Policy)

(As approved in the Board of Directors' Meeting No. 5 /2014 held on September 9, 2014)

Definitions

The Company refers to Bangkok Ranch Public Company Limited.

Subsidiary or Affiliate refers to

1. A company or juristic person that Bangkok Ranch Public Company Limited owns or holds over 50% of the shares with voting rights in such company or juristic person, whether those shares are held directly or indirectly through any person or juristic person, or
2. A company or juristic person over which Bangkok Ranch Public Company Limited has authority to control financial and operational policies to benefit from the activities of such company or juristic person.

Employee refers to someone who has an employment contract or a special hiring contract with the Company.

Persons Entitled to Complain

1. An employee who discovers an action that violates laws rules and regulations, the Company's Articles of Association, or the Code of Conduct.
2. An employee who is abused, threatened, or disciplinary penalized, such as by a reduction in salary, being laid off, being fired, or targeted for treatment that is unfair and related to conditions of employment, due to that employee having complained, informed, or been about to inform, assist in an investigation, or gather facts for a person handling the complaint.

Persons Handling Complaints

1. An employee's supervisor whom you trust
2. The Human Resources Department
3. The Secretary to the Board of Directors
4. Any member of the Company's Board of Directors

Procedure for Complaints

Complain to any person handling complaints as follows:

1. Complain directly, verbally or in writing.
2. Contact a person handling complaints by his/her e-mail address.
3. Send a letter to a person handling complaints.

The complaint shall be deemed top secret. The complainant may complain through several channels. If he/she does disclose his/her identity, this would allow the Company to report him/her the outcome of the investigation or additional particulars concerning the matter of complaint.

Procedure for Investigating Facts

1. The person handling complaints will be the one to investigate and collect facts, or may authorize a trusted person or agency to investigate the facts.
2. The person handling complaints or the one authorized by that person may ask any employee to provide information or deliver any related document for the investigation of facts.
3. If the investigation reveals that a violation did occur, the Company will act as follows:
 - If the complaint is one in which the Company committed a breach of laws, rules and regulations, the Company's Articles of Association, or the Code of Conduct, the person handling complaints or the one authorized by that person will submit the matter, opinion, and the appropriate course of action, to the person having authorities in the Company to consider courses of action. If the matter is important, such as one that affects the reputation and image or financial status of the Company, or conflicts with the Company's policies for conducting business, or involves a senior executive, it will be submitted to the Audit Committee or the Board of Directors for consideration.
 - If the complaint has a detrimental impact on any person, an appropriate and fair method of mitigating that impact will be suggested to the person so affected.

Protection and Defense of the Informant or Whistleblower

1. The complainant may choose not to disclose his/her identity if he/she believes that disclosure may harm him/herself, but he/she must provide sufficient factual details or clear evidence to show that there are grounds to believe that a violation of laws, rules and regulations, the Company's Articles of Association, or the Code of Conduct occurred in the business practices of the Company. Nonetheless, if he/she does disclose his/her identity, this would enable the person handling the complaint to act more quickly.
2. The Company regards the information related to the Company as secret, and will disclose only so much of it as necessary to ensure the safety of and prevent harm to those who report, their sources, and other individuals involved. The persons responsible at each stage must guard the information obtained with the utmost secrecy and not reveal it to anyone. A breach would be considered a violation of discipline.
3. If the complainant believes that he / she will not be safe or incur harm, he / she may ask the Company to provide appropriate protection, or the Company may provide such protection without the complainant's request if it is believed that danger or harm is likely to occur.
4. If an employee is unfair to, mistreats, or harms other person due to that person having complained or informed about or disclose of wrongful conduct or non-compliance with laws, rules and regulations, the Company's Articles of Association, or the Code of Conduct in the business practices of the Company, such action is regarded as a breach of discipline that must be penalized. He/she may be penalized as the law stipulates if such action is deemed an illegal offence.
5. Those who incur harm will be compensated in a fair and appropriate manner.