

Translation

Whistle Blowing Policy

TEKA Construction Public Company Limited (“the Company”) is committed to conducting business with honesty, integrity, ethics in line with the principles of good corporate governance which is an important factor that will improve the efficiency of the business operations and sustainable growth.

With a commitment to such principles and in order to treat all stakeholders equally whether internal stakeholders or external stakeholders as well as the government sector and related agencies, the Company has therefore formulated a whistleblowing or complaint policy (“Policy”) to accept the opinions, suggestions, complaints, and useful information from people within the organization and from the external party who are affected or at risk of being affected by the Company's business operations or a subsidiary or from illegal or unethical acts. This includes the corruption behaviors of the Company's directors, sub-committees, executives or employees of the Company or a subsidiary which is an important tool that will help monitor, follow up on the Company's business operations as well as develop and improve better Company's business operations and those of the subsidiaries in the future.

1. Objectives

- 1.1 To provide opportunities for those who have seen, suspected or affected by any illegal or unlawful activities, acts of corruption, non-compliance actions with the Company's regulations or behaviors that may cause damage to the Company or a subsidiary (“Complainant”) with the whistleblowing and complaint-filing channels to the Company.
- 1.2 To ensure that the process of handing comments, suggestions, questions or complaints is clear, appropriate, efficient, fair, honest, transparent and verifiable which is in accordance with the laws, Company's regulations and international standards.
- 1.3 To establish measures to maintain confidentiality and protect the whistleblowers and witnesses involved in the complaint, shall not be a victim of a violation of their right.
- 1.4 To prevent risks and damages that may occur to stakeholders from illegal and unlawful actions against business ethics or behaviors in performing the duties of the Company's directors, sub-committees, executives and employees of the Company.

2. Scope of the Policy

The whistleblower/complainant is able to report clues or complaints about important matters (both appearing or suspected) as follows:

- 2.1 Actions that violate the laws, rules and regulations of the Company or non-compliance actions with the policy on good corporate governance, code of ethics and business conduct and anti-Corruption
- 2.2 Inaccurate financial reports, defective internal control system and the preparation of false financial documents or failure to meet general standards or guidelines
- 2.3 Matters that affect the benefits and reputation of the Company or a subsidiary
- 2.4 Criminal acts or the offense of incitement
- 2.5 Any actions that create a clear risk of corruption, bribery and extortion
- 2.6 Failure to perform duties or comply with legal or good governance
- 2.7 Intentional act of concealing any types of wrongdoings mentioned above

3. Reporting Clues or Complaints Method

The Company provides opportunities for both internal and external stakeholders of the organization to report clues or complaints of any wrongdoings as specified in item 2 by clearly label all confidential information as confidential document through the following methods:

- 3.1 Clearly state the name, address and contact number of the whistleblower/complainant. Including information of the name of the person who commits a wrongdoing and the incidence of wrongdoing that are reliable, evidence-based with witness testimony (if any). However, the whistleblower or the complainant may choose to remain anonymous. if the disclosure will cause any insecurity or damage. If disclosure is made, progress can be reported, or to ask more useful information to clarify the facts or mitigate the damage more easily and quickly.
- 3.2 If the stakeholders both inside and outside the organization has seen any wrongdoings as specified in item 2 may report clues or complaints through various channels as deemed appropriate as follows:
 - a) Notify the supervisor who is directly responsible.
 - b) Send electronic mail to supervisors or the internal audit office or human resources department
 - c) Notify via post to the chairman of the audit committee or the Company's directors at the following address:

No. 28 Soi Ngamwongwan 6, Bang Khen Subdistrict, Mueang Nonthaburi District
Nonthaburi Province

d) Submit via the company's website (www.tekacon.com)

4. Process to Proceed when Receiving a Clue or Complaint

- 4.1 The Company will investigate complaints and clues about the wrongdoings and corrupt actions with independence and fairness. The Company will assign the company secretary, the Internal Audit Office or other appropriate units to collect relevant facts for consideration of the information received from whistleblower/complainant and to obtain evidence that can be used to confirm or contradict the information received.
- 4.2 In the event a whistleblowing allegation is found to be correct, the company secretary, the Internal Audit Office or other assigned units will report to the Audit Committee and the Board of Directors for consideration and acknowledgment. The Audit Committee and the Board of Directors shall then order or prescribe a guideline for the operation and appoint a committee to investigate facts for further consideration in the relevant fields.
- 4.3 After the investigation of the following allegations is done the Investigation, the guidelines for the operation will be proposed to the Audit Committee and the Board of Directors to consider, order or set corrective action guidelines and consider and determine appropriate penalties.
- 4.4 In the event a wrongdoing is found to be correct, the Company will take disciplinary action and/or take legal action against the person who commits a wrongdoing and determine appropriate remedial measures for those entitled to damages.
- 4.5 The Company will notify the progress and results of the consideration of complaints of wrongdoing and corruption to the whistleblower/complainant who have disclosed themselves to the Company. However, in some case there is a matter of the security of personal data and confidentiality, therefore, the Company may not be able to provide detailed information on investigations or disciplinary actions.
- 4.6 The Company will initiate an investigation as soon as possible, taking into account the seriousness of an allegation or complaint and will proceed with caution so as not to affect the quality and detail of the investigation. A preliminary investigation will find the conclusion of the inquiry and will proceed within 1 month from the date of receiving the allegation or complaint.

5. Protection of Whistleblowers or Complaints and Relevant Persons

To build confidence for the whistleblower/complainant who report clues or complaints with good faith which will be protected by the Company according to the following measures:

- 5.1 The Company shall not disclose name-surname, address, or any other information which may identify the whistleblower/complainant, information provider or cooperation person.
- 5.2 The Company shall keep the information of the whistleblower/complainant, information provider or cooperation person as well as any relevant information confidential and disclose as necessary taking into account the safety of and damages caused to the whistleblower/complainant, information provider or cooperation person. The access of information is limited to only those responsible for investigating complaints.
- 5.3 In the case of whistleblower/complainant, information provider or cooperation person foresee that there might be insecurity or damages caused, they may ask the Company to determine appropriate protection measures or the Company may provide additional protection without no asking by considering the degree of severity and the likelihood of damages or insecurity to whistleblower/complainant, information provider or cooperation person as deemed appropriate.
- 5.4 Those who have suffered from damages caused will be mitigated through appropriate and fair procedures.
- 5.5 The Company shall not do anything which is unfair to the whistleblower/complainant, information provider or cooperation person whether by changing job position, nature of work, place of work, ordering work suspension, threatening, interfering in the job, terminating of employment or any other act in a manner that is considered as an unfair treatment to that person.

6. Confidentiality

Any person who is aware of the whistleblowing information or complaints, information related to clues or complaints, the information and documentary evidence obtained must be kept confidential. This shall not be disclosed to any person who does not have a duty to do so, unless it is necessary in the procedure required by law. If there is an intentional breach of information disclosure, the Company will take disciplinary action and/or take legal action against those who violate it, as the case may be.

7. Report False Clues or Complaints

if the Company finds a fraudulent whistleblowing or complaints and has the intention of bullying others to be others to be damaged, defamed, insulted or provide any false information, the Company will consider punishing employees who provide such information based on the work regulations

including considering legal action, as the case may be. If it a person committing such action is an external party which the action has caused damages to the Company, the Company will consider legal action against that person.

Approved by resolution of the Board of Directors Meeting No. 4/2019 held on August 9, 2019.
This will be effective from 9 August 2019 onwards.

Signature
(Mr. Vithool Jearkjirm)
Chairman of the Board
TEKA Construction Public Company Limited