



ZEN Corporation Group Public Company Limited

Whistleblower Policy

Of

Zen Corporation Group Public Company Limited and Its Subsidiaries

Complainant

1. A person who has seen or known about directors, executives, employees and employees of Zen Corporation Group Public Company Limited ("the Company") and its subsidiaries acting of dishonesty or misrepresenting benefits, violating the law, human rights violation, Non-compliance rules, Articles of Association and regulations of the Company and its subsidiaries or the Code of Business Conduct of the Company and its subsidiaries.
2. A person who has been treated unfairly, bullied, threatened, or discriminated against by wrongful acts.

Complaint recipient

1. Director of Internal Audit (email: internalaudit@Zengroup.co.th)
2. Company Secretary (email: corporatesecretary@Zengroup.co.th)
3. Audit and Corporate Governance Committee (email: auditcom@Zengroup.co.th)

Complaint channels

Complaints can be made to one of the complaint recipient of the complaint with the following channels:

1. Through the Email Address of a complaint recipient
2. Made in a letter to a complaint recipient
3. In the event that the complainant chooses not to disclose their name, the complainant shall specify sufficient details, facts or evidence to show that there are reasonable grounds to believe that the act is a fraud or has disrupted benefit, an act in violation of the law, rules, and regulations of the Company and its subsidiaries or unethical business conduct of the Company and its subsidiaries.

In this regard, the complaint shall be regarded as the highest confidentiality, and the complainant can make more than one complaint and do not need to reveal his/her identity. However, if the complainant discloses himself/herself, the Company will be able to report the operation or additional details regarding the complaint.

Investigation Process

1. The person receiving the complaint submits the matter that has been received to the Investigation Committee, which consists of the Human Resource Manager, the Internal Audit Department Manager, and the Legal Manager.
2. The Investigation Committee shall investigate and gather facts or may assign an appropriate person or department to carry out the investigation.
3. The Investigation Committee or an assigned person may invite any staff and employee to provide information or may request any relevant documents for investigation.
4. If it is found to be true, the Investigation Committee will propose the matter with comments and specify guidelines for proper, appropriate, and fair practices to the authorized persons as follows:
 - In the event that a complaint is a matter of fraud or disruption of interest, it shall be proposed with comments and guidelines to the Internal Audit Department Director for consideration.
 - In the event that a complaint is a matter of violation of laws, it shall be proposed with comments and guidelines to the Legal Director for consideration.
 - In the event that a complaint is a matter of violation of the rules, regulations, or business ethics of the Company and its subsidiaries, it shall be proposed with comments and guidelines to the Compensation and Welfare Management for consideration. For offenses relating to business ethics, the Chief Executive Officer shall prescribe procedures/methods/any other measures to prevent repeat offences.
 - In the event that a complaint is an important issue such as affecting the reputation, image or financial status of the Company and its subsidiaries, or conflicting with the Company's and its subsidiaries' business policies or relating to high-level executives, for example, it shall be proposed to the Audit and Corporate Governance Committee or the Board of Directors for consideration.
 - In the event that a complaint causes damage to any person, appropriate and fair mitigation to the suffered person shall be provided.

Protection for complainants

1. A complainant may choose not to reveal himself or herself if he or she deems that disclosure may cause damage to himself or herself, but he or she shall provide sufficiently clear details of the facts or evidence to show that there are reasonable grounds to believe that the act is a fraud or has disrupted benefit, an act in violation of the law, rules, and regulations of the Company and its subsidiaries or unethical business conduct of the Company and its subsidiaries.

2. For related information, the Company shall treat it as confidential and disclose as necessary with regard to the safety and damage of the complainant. The person responsible for the process shall keep the information in the highest level of confidentiality and not disclose it to others, and the violation is considered a disciplinary offense.
3. In the event that a complainant considers that he or she may not be safe or may suffer, the complainant may request the Company to set appropriate protection measures, or the Company may specify protective measures without the request of the complainant if the matter is likely to cause damage or insecurity.
4. Those who have suffered shall be mitigated by an appropriate and fair mean or process.

This policy shall be effective from 24 February 2022 with the approval of the Board of Directors in the Meeting 2/2022.

(Mr. Paitoon Thawiphon)
Chairman of the Board of Directors