Whistleblowing and Complaints Policy

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Introduction

Jaymart Group Holdings Public Company Limited and its affiliated companies (together referred to as the "Company") are committed to conducting business based on the principles of good corporate governance, with responsibility, transparency and accountability, and have always given importance to the rights and the voice of stakeholders both inside and outside the organisation. In order to strengthen a transparent organisational culture and to prevent behaviour that causes negative impacts, such as disciplinary offences, breaches of the Code of Business Conduct or fraud, the Company has therefore established this Whistleblowing and Complaints Policy, covering wrongdoing by directors, executives, employees and other persons working in the business group, so that stakeholders can safely report information or incidents that may constitute a breach of the law, a breach of the Company's regulations, or a breach of the principles of corporate governance. Whistleblowers may report without having to disclose their identity. The Company will keep the information strictly confidential and has measures to protect both the whistleblower and the person providing information as a result of giving information or taking part in the investigation process. This also supports the sustainability of the organisation by helping to prevent and examine actions that may affect the Company in social, environmental and corporate governance terms. Having a safe and reliable whistleblowing system is an important foundation for the stable and sustainable long-term growth of the organisation.

Objectives

1. To ensure that the Company's business operations and the work of directors, executives and employees at all levels are carried out correctly, transparently, fairly and accountably, within the framework of the law, the Code of Business Conduct, the principles of good corporate governance and the related rules and regulations.
2. To provide a safe and accessible channel for employees and outside persons to report tip-offs or information about wrongdoing, fraud or inappropriate behaviour that occurs in the Company.
3. To protect persons who report tip-offs or provide information to the Company, so that they are safe from retaliation, harassment or discrimination, both during the investigation and after the process has been completed, so that the reporting person can provide information without having to worry about any impact.

4. To set out clear, fair and accountable guidelines for receiving, examining and investigating the complaints or tip-offs received.
5. To prevent and reduce the chance of wrongdoing or fraud, and to manage effectively the risks that may affect the organisation.

Scope

This Policy applies to Jaymart Group Holdings Public Company Limited and all of its subsidiaries, and covers the approaches, the guidelines for practice and the processes relating to whistleblowing and complaints, from both personnel inside the organisation and stakeholders outside the organisation, within the framework set out in this Policy.

Definitions

"Company" means Jaymart Group Holdings Public Company Limited and its affiliated companies.

"Employee" means an employee of Jaymart Group Holdings Public Company Limited and its affiliated companies, at every level.

"Whistleblower" means an employee, a business partner, a business ally or an outside person who reports a tip-off through the channels prescribed by the Company.

"Breach of the Code of Conduct" means the failure to comply with the guidelines, standards and business ethics prescribed by the Company, which directors, executives and employees at every level are expected to strictly observe as the principles for their work.

"Wrongdoing" means any act or omission by directors, executives or employees at every level that constitutes a breach of the Code of Business Conduct, the work rules, the regulations and the various policies of the Company, or a breach of the laws relating to the Company's business, and/or that affects the credibility, reputation, assets or rights of the Company and its stakeholders.

"Fraud" means any act or behaviour carried out with dishonest intent for the purpose of obtaining money or any other benefit, or any act that is unlawful and causes damage to the Company.

Whistleblowing and Receipt of Complaints

The Company provides channels for whistleblowing and for receiving complaints for employees or groups of stakeholders of the Company, for use when they see or become aware of a matter that may constitute a breach of the Code of Business Conduct, a breach of corporate governance, fraud and corruption, or any other related matter. The whistleblowing and complaint channels are safe channels that maintain the confidentiality of the whistleblower, with the Wrongdoing Investigation Committee being directly responsible.

Guidelines for Practice

1. The Company promotes an open and transparent organisational culture by giving employees and stakeholders the opportunity to report, in good faith, any concern or inappropriate behaviour that may breach the Code of Conduct, the law or the Company's requirements.
2. The Company provides whistleblowing channels that are safe, confidential and convenient to use, so that the reporting person can report a concern without fear of retaliation or any impact.
3. A whistleblower or complainant will be protected from harassment, intimidation, discrimination or punishment in every form, both direct and indirect.
4. The reports received will be considered and examined fairly, accurately and carefully, and the accused person will be given an appropriate right to explain.
5. The Company will keep the identity of the whistleblower strictly confidential, unless consent has been given or there is a legal requirement to disclose it.
6. Intentionally reporting false information is regarded as a breach of the Code of Conduct and may lead to disciplinary action under the Company's regulations.

Scope and Conditions for Whistleblowing and Receipt of Complaints

1. The whistleblower or complainant has found wrongdoing, or a situation that may constitute wrongdoing as prescribed by the Company. The tip-off must contain information at a level that can be linked to the facts, or must include evidence that can lead to further investigation.

2. The tip-off must contain information that can be verified, and must not be based only on a personal opinion or feeling without appropriate evidence or reasons, so that the consideration process is efficient, transparent and reliable.
3. The whistleblower or complainant is a person who has been treated unfairly, a person who has been affected by the wrongdoing either directly or indirectly, including a person who has been intimidated or threatened into taking part in wrongdoing with any person or group of persons connected with the Company.

Whistleblowing and Complaint Channels

E-mail : whistleblowing@jaymart.co.th

Website : https://www.jaymart.co.th/th/investor-relations/whistleblowing-and-complaint-form

Post : addressed to the "Audit Committee", No. 187, 189 Jaymart Building, Ramkhamhaeng Road, Rat Phatthana Sub-district, Saphan Sung District, Bangkok 10240

Suggestion box : Jaymart Building, Building A, Floor L, No. 187, 189 Jaymart Building, Ramkhamhaeng Road, Rat Phatthana Sub-district, Saphan Sung District, Bangkok 10240

Protection of Whistleblowers and Complainants

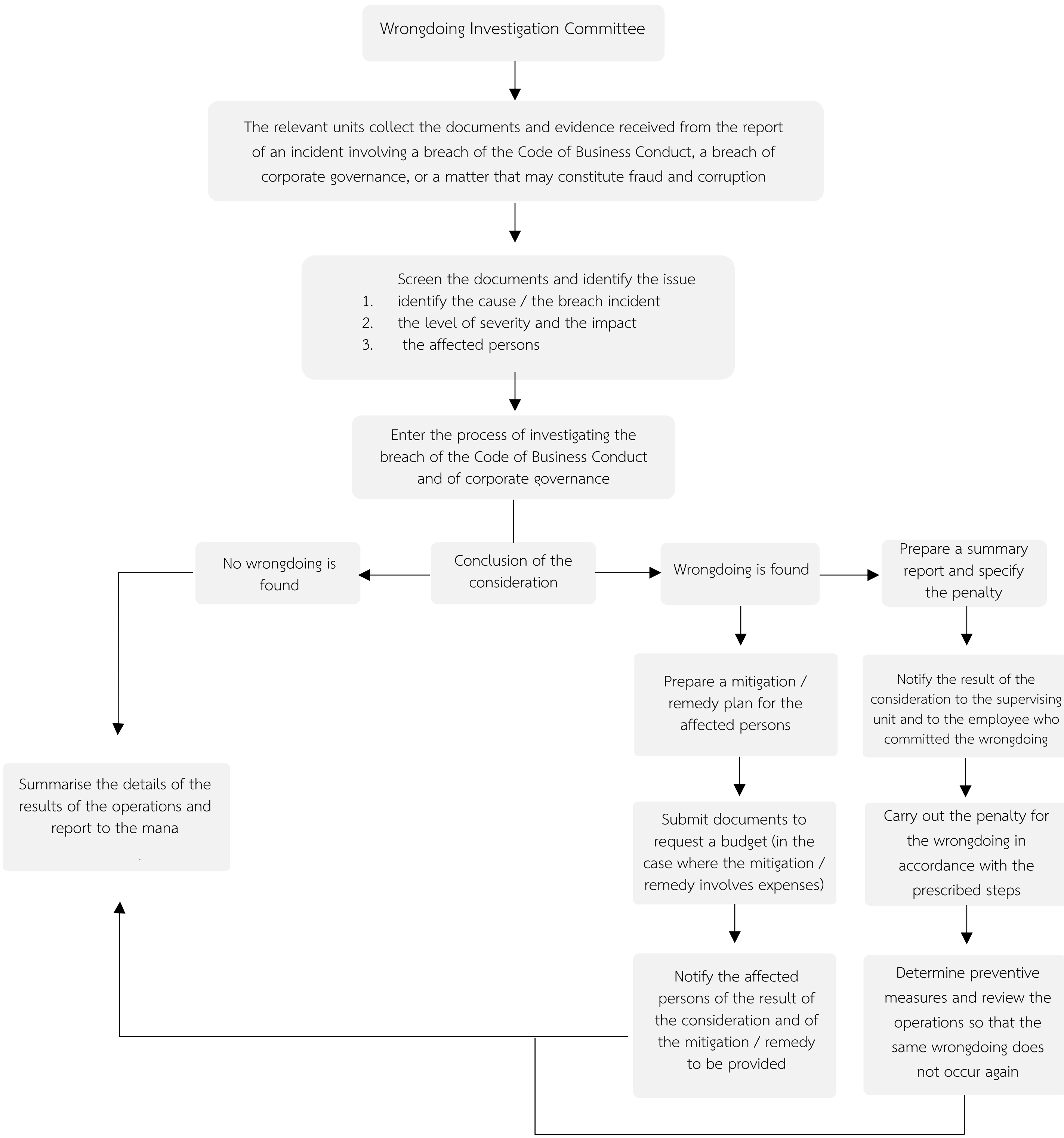
1. In order to protect the rights of whistleblowers and complainants, the Company will not disclose the name of the whistleblower or of the persons involved, nor the details of the tip-off or the related facts. The Company will keep the information confidential, giving priority to safety, and only the persons responsible for examining the tip-off have the right to access such information, except where the information is disclosed as required by law.
2. The Company will consider the incident and carry out the fact-finding process with care for sensitive issues in all respects, in order to avoid negative impacts that may be harmful to the whistleblower. The Company will provide fairness to both the whistleblower and the accused person, without discrimination.
3. The Company will protect the whistleblower or the persons involved from being harassed as a result of the tip-off or of properly performing such duty.

4. In the case where a whistleblower or complainant, including a person who cooperates in the fact-finding, considers that he or she may not be safe or may suffer trouble or damage, that person may request the Company to put in place appropriate protection measures.

Consideration of Wrongdoing

1. The Company will carry out an examination immediately upon receiving a tip-off, or upon finding behaviour that may constitute a breach of the Code of Business Conduct, wrongdoing, or non-compliance with the principles of corporate governance, by assigning the investigation committee or the relevant authorised persons to be responsible for the fact-finding.
2. The persons involved must provide complete information and hand over complete evidence, so that the investigation process is thorough, transparent and fair, based on the witnesses, the evidence and the explanations received.
3. If the result of the investigation indicates that there is no wrongdoing, the Company will close the matter without taking any further action. However, if wrongdoing is found, the matter will enter the disciplinary consideration process according to the severity of the behaviour.
4. Every step of the investigation will be carried out on the basis of transparency and fairness, and the accused person will be given the opportunity to explain before the final decision is made. If the result of the investigation reflects a weakness or a gap in management, the Company will use such information to improve its management system, its risk management and its preventive measures, so that the same type of incident does not occur again in the future.

Process for Considering Wrongdoing



Penalties

The Company has guidelines for taking disciplinary action against persons who commit wrongdoing, or whose behaviour breaches or fails to comply with the Code of Conduct, the rules, the policies and the principles of corporate governance that have been prescribed. The Company will consider disciplinary penalties in accordance with the work rules, taking into account appropriateness, fairness, the level of severity of the act, the impact that has occurred and the intent of the wrongdoer.

Disciplinary penalties consist of a verbal warning, a written warning, suspension from work without pay, and termination of employment. The Company will select the measure that is appropriate to the behaviour and the situation that has occurred, without having to follow the steps in order.

In the case of serious wrongdoing, the Company has the right to terminate the employee's employment without prior notice and without severance pay, for example, giving or receiving a bribe, fraud and corruption, disclosing the Company's confidential information or intellectual property without permission, concealing important information from a supervisor, or any act that seriously damages the reputation and credibility of the Company. Furthermore, if such behaviour constitutes an offence under the law, the Company will take legal proceedings, which are not limited to internal disciplinary penalties.

Monitoring of Operations and Review of Issues

The Company requires the management to monitor, on a regular basis, the complaints received through the various complaint channels, in order to be confident that when a complaint arises the management will act in accordance with the process for considering a breach or wrongdoing promptly, correctly and fairly to all parties, in particular the steps for mitigating and remedying the persons affected by that breach or wrongdoing. The Company also prepares for the review, improvement and development of the process in order to reduce wrongdoing and to appropriately prevent the recurrence of incidents in line with the context of the organisation.

This also includes promoting knowledge of responsibility in accordance with the good practices of the Code of Business Conduct, corporate governance and anti-fraud and anti-corruption, which directors, executives and employees should strictly comply with.

Schedule for Policy Review and Improvement

The unit responsible for the Whistleblowing and Complaints Policy is required to update the details of each process so that they remain current and appropriate to the situation, on an annual basis, at least once a year, in order to propose them for approval by the Board of Directors in accordance with the subsequent process.

This Policy shall be effective from 14 May 2025 onwards.

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Approver of the Whistleblowing and Complaints Policy

Mr. Pisnu Pong-Acha

Chairman of the Board of Directors

Revision History

Revision No.	Responsible Unit	Review Date	Effective Date	Details of Revision
REV00	Investor Relations	At the Board of Directors' Meeting No. 4/2025 on 14 May 2025	14 May 2025	First issue of the policy