



ANNOUNCEMENT NO. 3/2025

WHISTLEBLOWER POLICY AND GUIDELINES

The announcement no. 6/2024 "Whistleblower Policy and Guidelines" announced on April 3, 2024 is cancelled and to be replaced with this announcement.

Silamas Group has focused on business code of conduct and ethics, it is by conducting business with accuracy, transparency, accountability, and fairness to both internal and external stakeholders as well as improving the work process to be consistent with the code of conduct and in accordance with the international standards.

In order for the business operation of the Company to be in accordance with the such principle, it is deemed appropriate to have a channel for whistleblowing about behavior or actions that are considered to be a violation of the law, company regulations, business ethics as well as determining the protection of whistleblowing.

On behalf of the Managing Director, We sincerely hope that all of us will strictly adhere to and comply with this policy.

This will be effective from February 18, 2025 onwards.
Announced on February 18, 2025.

A handwritten signature in blue ink, appearing to read 'C. Glinpu'.

(Mr. Chompoo Glinpu)
Managing Director

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1. Whistleblower Policy

SILAMAS GROUP is committed to the standards of openness, integrity, and accountability in line with its Business Code of Conduct and Ethics and Anti-Corruption Policy. Therefore, a mechanism to enable all management, employees, other members of the Company, and external parties to voice concerns in a responsible and effective manner, the company has established the following policy.

1. The company will not disclose names of whistleblowers or related persons and details of whistleblowing or related facts by limiting access to information and storing such information as the company's confidential. Only the person responsible for conducting the investigation of whistleblowing can access to such information unless it is a legal disclosure.
2. The company will protect the whistleblowers or related persons from being harassed caused by whistleblowing or rightfully performing such duties.
3. The company will not conduct any punishment or take legal action against the whistleblower or related person in cases where such a person gives information in good faith, even after conducting the investigation, it is found that there is no misconduct or violation as reported.
4. The Management shall establish guidelines to align with this policy.

Any actions violating this policy shall be considered for disciplinary action in accordance with the Company's rules which may include termination if deemed appropriate. Additionally, any Company Personnel found to be in violation of these policies may be subject to legal action.

2. Whistleblowing Guidelines

2.1 Objectives

- To ensure that the business operations of the Company and the performance of employees at all levels are accurate, transparent, fair, and verifiable by law with the business code of conduct and ethics, regulations, and various regulations of the organization.
- To ensure for whistleblowers and related persons who cooperate with the Company in good faith to receive appropriate and fair protection from being treated badly due to whistleblowing.
- To ensure that the implementation of whistleblowing is effective and in accordance with the international standards.

2.2 Scope

This policy applies to:

- Silamas Transport Co, Ltd.
- Silamas Services Co, Ltd.
- Renewable Energy Services Co, Ltd. (RES)
- Oceanic Solutions Co, Ltd. (OSC)

3. Definition

Whistleblower	an employee, a business partner, a business ally, a third party who reports perceived anomalies to the Company's specified channels.
Fraud	an intentional act committed to secure unfair or unlawful gains for one's self or others (e.g. family, relatives, friends or acquaintances).

Corruption

The misuse of position or power of influence for inappropriate gains for the organization, one's self, or others. Corruption includes bribery, Facilitation Payment, conflicts of interest, economic extortion and illegal gratuities given to government officials or private organization, unless allowed by laws, regulations, tradition, culture or market conduct.

4. Scope of Whistleblowing

Misconduct behaviors may be complained in accordance with this policy.

No.	Misconduct behaviors	investigator
1.	Behaviors related to intentional acts to seek unlawful benefits for oneself or others in addition.	HR Department or Authorized person
2.	Behaviors related to transaction process that violate laws, rules, regulations, company regulations, business code of conduct and ethics, and working practices.	HR Department or Authorized person
3.	Behaviors related to human rights violations such as discrimination or harassment, etc.	HR Department or Authorized person

5. Roles and Responsibilities

5.1 Managing Director

- Determine the policy for whistleblowing and / or other related policies.
- Consent and approve operating procedures and channels for whistleblowing, including protection measures for whistleblowers and informants.

5.2 Management Team

- Providing operational procedures and channels for whistleblowing, including protection measures for whistleblowers and informants of information appropriately and presented to the Managing Director for approval.
- Arranging to have a responsible for whistleblowing and investigating.
- Arranging the communication with understanding for employees, business partners, business allies, and outsiders to acknowledge about policies, procedures, and whistleblowing channels.
- Arranging for the disclosure of this policy, progress reports, and summary of whistleblowing.

5.3 Recipients

- Collecting facts, verifying information and evidences of whistleblowing
- Submitting whistleblowing that has been approved to the investigator.
- Preparing a report summarizing the results of the whistleblowing, misconduct and fraud, and then informing the whistleblower and those involved in the matter of the Company as necessary and appropriate.
- Recording progress and collecting data.

6. Whistleblowing

Before doing the whistleblowing, if it is unclear whether the action is in line with the scope of whistleblowing or not, Whistleblower should proceed in seeking advice from the HR Department or the Authorized person.

Employees, business partners, business allies, and the third parties can do whistleblowing according the following channels.

No.	Whistleblowing Channels	Contact Channels	Recipients
1	E-mail	E-mail : hr@silamas.com	HR Department
2	Post	HR Department at Silamas 68 Moo 2, Sriwareenoi Rd., Srisajorakhaenoi, Bangsaothong, Samutprakarn 10570 THAILAND	HR Department
3	Anonymous Comment box	At Samutprakarn and Chonburi	HR Department Safety Department

7. Whistleblowers

Whistleblowing's Guideline have the following duties.

7.1 In case the whistleblowers revealed themselves

- Inform the name and contact channels.
- Notify the suspect's name (if known).
- Notify date, time, and crime scene.
- Whistleblowing the circumstances that are found or have reasonable grounds to believe that there is a misconduct which in within the scope of considered behaviors according to Article 4.
- Cooperate in providing additional information (if requested).

7.2 In case that the whistleblower does not reveal his/her identity

- Notify the name of the suspect (if known).
- Notify date, time, and crime scene.
- Whistleblowing the circumstances that are found or have reasonable grounds to believe that there is a misconduct which in within the scope of considered behaviors according to Article 4.

7.3 Investigation Process

- 7.3.1 The recipients proceed to collect facts, verify the credibility of the information and evidence, and submit whistleblowing that have been approved to the investigators.
- 7.3.2 The investigators conduct a detailed investigation until it is concluded with results of the investigation and reported to the authority for the consideration of penalties (if any).
- 7.3.3 Investigators summarize the report investigation, whistleblowing/ misconduct and fraud, and punishment (if any) preventive/corrective measures to the management and relevant department.
- 7.3.4 Recipients summarize the report investigation, whistleblowing/misconduct and fraud and then informing the whistleblower and relevant persons to be informed as necessary and appropriate.

7.4 Measures to protect whistleblowers

- 7.4.1 The company will not disclose names of whistleblowers or related persons and details of whistleblowing or related facts by limiting access to information and storing such information as the company's confidential. Only the person responsible for conducting the investigation of whistleblowing can access to such information unless it is a legal disclosure.
- 7.4.2 The company will protect the whistleblowers or related persons from being harassed caused by whistleblowing or rightfully performing such duties.
- 7.4.3 The company will not terminate the employment, change the job position, job description, work place, disciplinary action, or perform any other sanction unfair to the whistleblowers or related persons who do not intend to give false information or rightfully perform their duties.
- 7.4.4 The company will not conduct any punishment or take legal action against the whistleblower or related person in cases where such a person gives information in good faith, even after conducting the investigation, it is found that there is no misconduct or violation as reported.
- 7.4.5 The company will alleviate the damage with appropriate and fair procedures for such persons who have been damaged from reporting information.
- 7.4.6 In the event that such persons, including those who cooperate in the investigation of facts, feel that they may not be safe or may be in trouble, can request the company to set up appropriate protection measures.

7.5 False whistleblowing

If the result of the investigation reveals that the providing information is untrue and the whistleblower has dishonestly committed in giving false information or doing any other actions that are deliberately causing the company and / or the victim to be damaged, the company will consider punishing the whistleblower as follows.

- 7.5.1 In the case where the whistleblower is an employee, the company will consider investigations and take action in accordance with work regulations, which have penalties ranging from verbal or written warnings, work suspension, to dismissing from work including considering the implementation of the process of both civil and criminal law.
- 7.5.2 In the event that the whistleblower is a business partner or business allies, the company will consider terminating the business as well as continuing to follow the process of both civil and criminal law.
- 7.5.3 In the event that the whistleblower is a third party, the company will continue to follow the process of both civil and criminal law.

Amendments History

Announcement No.	Effective Date	Description
6 / 2024	3/4/2024	First Issue
3 / 2025	18/2/2025	Edited subject no. 2.2, Scope of Application by adding the enforcement of "OSC" company.