

Whistle-blower Policy

Minor International Pcl. ('the Company', 'MINT') believes that employees are valuable assets of the Company and is determined to ensure that every employee is confident in the organization through working environment, fair treatment, benefits, training and development. Aiming to develop good governance, promote the high ethical standards and behavior in organization, the Company with a Business Code of Conduct, encourages employees to report unethical practices (whether or not a violation of law) and require employees to address the suspected integrity violations or complaints to a Whistle-Blower Steering Committee to investigate and examine the issue. The Company will protect those who come forward to report such activities.

Objective

The objective of the Whistle-Blower policy is to conduct business with high ethical standards and also to detect and root out wrongdoing and behavior inconsistent with MINT corporate values.

The Composition of Whistle-blower policy

1. The Whistle-Blower Steering Committee ('the Steering Committee') is chaired by Chief People Officer (CPO). Group Director of Internal Audit & Risk Management, Director of Corporate Secretary and Head of each business units (VP or GM level of hotel, food, retails, corporate) are members. The Steering Committee is responsible for the Whistle-Blowing issue including investigating and reporting to the Nominating and Corporate Governance Committee.
2. Secretary to the Steering Committee ('the secretary') consists of HR Director of each business unit (HR Director of hotel, food, retails, corporate). The secretary is responsible for screening the whistle-blowing issues, fact finding before submitting the valid issue to the Steering Committee.
3. Employee means management, employees of MINT, MINT's subsidiaries and affiliates.

Channels

Employees who would like to speak out concerning wrongdoing or violations of laws and rules, unethical practices, misconduct issues, etc. can contact via channels below:

1. Email: whistleblower@minor.com (this e-mail will run through the secretary, Group Director of Internal Audit & Risk Management and Director of Corporate Secretary)
2. Post: Whistle-Blower Steering Committee
MINOR Group
Human Resource Department (Whistle-Blower)
75 White Group II Building, 6th Floor,
Sukhumvit 42 Road, Klongtoey,
Bangkok 10110

Procedures for investigation process

- 1) **Fact Finding:** The secretary will gather all Whistle-Blowing issues and determine the facts. The secretary will instruct related parties to collect pertinent of information. Fact finding should be done within 7 working days after receiving the Whistle-Blowing complaint.
 - If the issue is against member of the Secretary, such Secretary cannot be involved in the fact finding and investigating process.
 - If the issue is against Chairman of the Steering Committee, such issue needs to send to Chairman of Audit Committee
- 2) **Determining the Issues:** If the Secretary determines the issue is valid, the issue will be brought to the Steering Committee to complete the investigating process. If the Secretary determines the issue is invalid, the issue will be dropped and will be reported to the Steering Committee with the rationale.
- 3) **Investigation:** The Secretary will call a meeting of the Steering Committee. The Steering Committee may assess and screen the information to determine the steps and appropriate measurement and finalize the issue within the following month. The Steering Committee shall have the authority to authorize, appoint and consult with the legal department and/or the internal audit department and/or other appropriate departments to investigate the issues.
- 4) **The Decision:**

If the decision absolves no the defendant of any wrong-doing, he/she has the right to disclose the decision to the public.

If the decision finds the defendant guilty of any wrong-doing, the Steering Committee shall determine corrective actions as deemed appropriate.
- 5) **Reporting:** The Steering Committee will normally report the Whistle-Blowing issue and work in progress to Nominating and Corporate Governance Committee on a quarterly basis regarding:- Total number of issues received, Nature of issues, Outcome of investigation, Action taken, etc.

If the matter is an important one or significant by quantitative measures or related to the Company's senior executives, the issue will be brought to the attention of the Audit Committee and Board of Directors.

Protection

Confidentiality will be maintained to the fullest extent possible. All reports are subject to appropriate investigation and are brought to full closure using systematic processes and tracking systems with confidence that Whistle-Blowers would not face persecution. This includes mitigation of trouble for Whistle-Blowers if their reporting was done in good-faith without any malice to the Company or any other party. Those who incur harm will be compensated in a fair and appropriate manner.