

(Translation)

Whistleblowing Policy

i-Tail Corporation Public Company Limited (“**The Company**”) has provided this Policy to be applicable to directors, subcommittee members, executives, employees, customers, hired workers and stakeholders of the Company.

Whereas, this Policy has determined reliable whistleblowing processes, methods and channels for employees, customers, hired workers and stakeholders of the Company relating to their complaints on actions, offences and misconducts of directors, executives, employees and agents or representatives on behalf of the Company which have been witnessed or acknowledged. Moreover, the Company has also determined the policy of protection of complainants or whistle-blowers, witnesses and other informants from disciplinary actions or other impacts from their supervisors or executives; provided that such complaints or whistleblowing shall be made in good faith without any libel or revenge.

1. Scope of Whistleblowing

- When there are reasonable doubts or causes to believe in good faith that directors, subcommittee members, executives, employees, hired workers and stakeholders of the Company have taken actions which may indicate corruption, breach or non-compliance with the corporate governance policy, business ethics, policies or any rules and regulations of the Company
- “Act of Potential Corruption” means any act of seeking of undue benefits against the laws and rules and regulations of the State for oneself or for others such as embezzlement, corruption, cheating and fraud, concealment of facts, etc.

2. Whistleblowing Channel

Upon witnessing an act of potential corruption, including any breach or non-compliance with the corporate governance policy, business ethics, policies or any rules and regulations of the Company by directors, subcommittee members, executives, employees, agents or representatives of the Company, complainants or whistle-blowers should firstly inquire or consult with their supervisors. In case, complainants or whistle-blowers feel uncomfortable to do so; or the matter of complaints is related to their supervisors, then, complainants or whistle-blowers may notify the matter through the prescribed channels of complaints and whistleblowing by specifying names or contact telephone numbers for inquiries of details relating to the matter of complaints for investigation of facts in the future; provided that the data of complainants or whistle-blowers shall be kept confidential and shall not be disclosed to third parties, unless disclosed as per legal requirements.

The Complaint Recipient shall be obliged to receive matters of complaints and to thoroughly consider the content or issues of complaints and the independence of investigation of facts, to follow up and to report the progress of such investigation thereof to the Audit Committee, the top management and directors of the Company for acknowledgment from time to time to ensure that such matter of complaints has been properly handled as per the steps and processes.

Provided that a false complaint shall be regarded as serious offence as per the Company’s Rules and Regulations and breach of laws, and such complainant or whistle-blower of a false matter shall be subject to the ultimate disciplinary action of dismissal.

3. Protection of Complainants or Whistle-blowers, Witnesses and Related Parties

Complainants or whistle-blowers and witnesses shall receive proper and fair protection from the Company. The Company shall keep the complaints, complainants or whistle-blower and witnesses confidential and shall not disclose such data to any third parties, except for disclosure thereof for the purpose of investigation and/or disclosure as per legal requirements.

Related parties who have received the matter or data relating to complaints shall keep confidential and shall not disclose the same to third parties, except for cases of necessity that such data shall be disclosed for the purpose of investigation and/or disclosure as per legal requirements. In case, the related parties have intentionally breached the same by disclosing such data, the Company shall punish such related parties as per the Company's Rules and Regulations and/or shall take legal actions against such related parties, as the case may be.

Moreover, the Company shall not allow any retaliation action against the complaining or whistleblowing employees and shall take disciplinary action against the person who is found taking such retaliation action. In case, complainants or people giving cooperation in the investigation of facts feel unsafe, troubled or damaged, they may request the Management or the Audit Committee to determine proper measures of protection.

Provided that any person who has willfully or negligently taken any action in breach of these Regulations or having behaviors of libel or threatening to take disciplinary action or discrimination by any unfair methods against complainants or whistle-blowers or related parties thereto resulting from such complaints hereunder shall be regarded as having breached the disciplines and shall indemnify damages to the Company or to people who have been affected by such action and shall also assume civil and criminal liabilities or under other laws.

4. Complaints in Bad Faith

Regarding the notification of matters of complaints or whistleblowing or giving of statements or any information by an employee of the Company, in case, it can be proved that such action is taken in bad faith or in the manner of willful libel, slandering or distortion of facts, such employee shall be subject to disciplinary actions as per the Company's Rules and Regulations. Moreover, the Company may also consider taking legal actions, as the case may be, in case, such action is taken by third parties and causing damage to the Company.

5. Investigation Period

The Company shall start an investigation as soon as practicable by taking account of the severity of allegations or complaints and shall carefully conduct such investigation not to affect the quality and details of investigation. Regarding the primary investigation, the Company shall summarize the fact inquiry and shall take action within 1 month from the date of receiving such allegations or complaints.

6. Fact-Checking Process

Upon receiving the whistleblowing matter, the Audit Committee shall scrutinize, investigate and check the matter of facts. The Audit Committee may assign a representative of the Personnel Resources Department, the Department of the complained or whistle-blown person or other independent departments or units such as the Legal Department, the Accounting Department, etc., to collect evidences and to take any action of investigation or fact-finding of clues or complaints and to recommend guidelines for handling with such complaints; provided that such investigation process shall be transparent and upright.

7. Channels of Complaints and Whistleblowing

The Board of Directors shall provide channels of complaints and whistleblowing indicating that stakeholders have been affected therefrom; and it may cause damage from the Company's operations or from any employee or any group taking any action in bad faith or against the laws, complainants may submit the matter to:

- 1) Suggestion and complaint box
- 2) Verbal or written whistleblowing and complaints shall be directly submitted to:
 - Supervisors at all levels as trusted by complainants
 - Personnel Resources Manager
 - Company Secretary
 - The Board of Directors
 - The Audit Committee
- 3) Via direct mail to: Chairman of the Audit Committee/Head of the Internal Audit
i-Tail Corporation Public Company Limited
979/92-94, 29th Floor, SM Tower, Phaholyothin Road, Phayathai Sub-district,
Phayathai District, Bangkok 10400
Tel: 02-2980029

This Policy has been approved by the Board of Directors and shall be effective from 21st March 2022 onwards.

(Mr. Cheng Niruttinanon)
Chairman of the Board of Directors
i-Tail Corporation Public Company Limited