

## The Whistleblower Policy

NFORCE-PL-MGT-019

On August 14, 2020

nForce Secure Public Company Limited ("**the Company**") has the policy to protect and provide fairness to employees who provide information or give clues about corruption or non-compliance with the law, rules, and regulations of the company and the code of conduct as follows:

### **Petitioner**

1. Employees who witness fraudulent actions or violate the law, rules, and regulations of the company or the code of conduct.
2. Employees who are harassed, intimidated, or subject to disciplinary action, such as reductions in salary, suspension, dismissal, or discrimination through unfavorable means concerning their employment conditions due to their complaints or information. Assist in the investigation process or collect facts for the recipient of the complaint, including litigation, testimony or any cooperation with the court or government agency.

### **Petition Recipient**

1. Chief Executive Officer or Chairman of the Audit Committee
2. Human Resources Executive
3. Internal Audit Department

### **Petition Method**

A petition can be made through one of the following complaint recipients:

1. Via the E-mail address of the company or the petition recipient
2. A letter to the petition recipient
3. The company's website

If the petitioner chooses to remain anonymous, he or she shall specify facts or clear evidence sufficient to show that there are reasonable grounds to believe that fraudulent

activities have been committed or violated the law, rules and regulations of the company or the code of conduct.

The complaint shall be kept confidential, and the petitioner may file a complaint in more than one way, but the identity of the petitioner is not required to be disclosed. Unless self-disclosure allows the company to notify the results of operations or provide additional information on the complaint.

### Fact Checking

1. In conducting an investigation and gathering facts, the petitioner recipient shall submit a complaint to the following persons to act as investigators and collect the facts ("Auditors") according to complaints.

- (1) If the petitioner is an employee at a lower level than the Chief Executive Officer:

The Chief Executive Officer and/or the person or unit assigned by the Chief Executive Officer shall act as an auditor.

- (2) If the petitioner is an employee at the level of Chief Executive Officer or higher:

The Audit Committee and/or the person or unit assigned by the Audit Committee are to act as auditors.

In this case, the auditor can invite any employee to provide information or request to submit any relevant documents for investigation.

2. If investigated and found that the complaint is true, the Company will proceed as follows:

- (1) In the case of complaints related to fraudulent or illegal acts, regulations or business practices, and the code of conduct, the auditors consider submitting such complaints together with their opinions to the Audit Committee for further consideration.

- (2) Where such complaints are important, for example, a matter that affects the reputation, image, or financial position of the company, conflicts with the company's business policy or involves high-level executives, etc., the auditor shall consider and propose such matter with opinions to the Board of Directors for further consideration.
- (3) In the event of a complaint causing damage to any person, the investigator may propose appropriate and fair mitigation measures to the injured person as they deem appropriate.

#### **Protection of informants or whistleblowers**

1. Complainants may choose to remain anonymous if they deem that disclosure may cause harm to themselves, but they shall provide sufficient details of facts or evidence to show that they have reasonable grounds to believe the action was taken that is a fraud or violates the law, rules, and regulations of the company or the business practices and the code of conduct. However, choosing to disclose themselves will allow the recipient of a complaint to act more quickly.
2. Information relating to the Company's complaint is confidential and will be disclosed to the extent necessary with due regard to the safety and damage of the reporter, the source of the information, or the person concerned. The person responsible for every step shall keep the information known with the utmost degree of confidentiality and not disclose it to anyone else. Failure to do so is considered a disciplinary offense.
3. The Board of Directors, Managing Director, or any designated person may determine, as appropriate, measures to protect complainants if it is considered a matter that is prone to damage or insecurity to the complainant as a result of the complaint under this policy.
4. Employees who treat other people by unfair means or discriminate with improper methods have reported complaints or provided clues about the company's corruption or violation of laws, rules, regulations, or the codes of conduct and

business ethics, including the fact that other people filed lawsuits as witnesses. Any statement or cooperation with a court or government agency constitutes a disciplinary offense that is subject to penalties and may be punished by law if the offense is committed under the law.

5. Those who have suffered damage will be mitigated by means or procedures that are appropriate and fair.

The Whistleblower Policy is approved by the Board of Directors Meeting No.5/2020 on August 14, 2020 and is effective from August 14, 2020.