TURNKEY COMMUNICATION SERVICES PUBLIC COMPANY LIMITED

Whistleblower Policy

P-BOD-011

	Document Revision Record	Code P-BOD-011
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	Whistleblower Policy	Revision 1

Revision	No.	Date	Page	Description/Details
1	1/2022	23/12/2022	All	Replace the Company new logo

Turnkey Communications Services Public Company Limited ('Company') has a policy regarding the protection and fair treatment of whistle blowers that provide information about corruption and illegal activity, violation of Company rules, regulations, Code of Conduct, and ethics known as the Whistleblower Policy as follows:

People with the Rights to Complain

1. Employees who identify wrongdoings or violations of laws, rules, regulations, Code of Conduct, and Company ethics.
2. Employees who have been bullied, threatened, or disciplined, such as those who receive pay cuts, forced leave, terminated, or improperly discriminated as retaliation for complaints, whistleblowing, or providing evidence, cooperating in investigations, or collecting evidence to the complainer, pursuing litigation, acting as witness, providing testimony or other form of assistance to the government in judicial process.

Recipients of Complaint

1. CEO or Chairman of Audit Committee
2. Head of Human Resource and Administration Department

Procedure for Lodging a Complaint

The complaint can be made through one of the following channels:

1. Via Company email or recipient of the complaint
2. By letter to the recipient of the complaint
3. Via corporate website

If the complainer wishes to be anonymous, the evidence must be clear enough to indicate some form of wrongdoing, legal transgression, violation of Company rules and regulations, Code of Conduct, or Company ethics.

In addition, the complaint must be treated with complete confidentiality, and the complaint can be made via multiple channels while remaining anonymous except in cases where revealing his identity will help the Company disclose its operations or further details of the investigation.

Procedure for Investigating Evidence

1. In investigating and collecting evidence, the recipient of the complaint will propose the complaint to the following persons who have the role of investigating said evidence **("The Investigator")**.

(1) The accused is ranked below CEO

The CEO and/or person or department assigned by the CEO will act as Investigator.

(2) The accused is a CEO or higher

The Audit Committee and/or person or department assigned by the Audit Committee will act as Investigator.

In this case, the Investigator can invite an employee to give evidence or submit any related documents for evidence inspection.

2. If the complaint is found to be true, the Company must:
   (1) If the complaint is related to corruption, legal transgression, violation of rules, Code of Conduct, or the Company's business ethics, the Investigator will evaluate the complaint and the opinion of the Audit Committee for further consideration.
   (2) If the complaint is important, such as having an impact on the reputation, image, or financial position of the Company, contradicts the Company's policy for business operations, or is linked to high-ranking executives, the Investigator will submit the complaint and their opinion to the Board of Directors for further consideration.
   (3) If the complaint has caused harm to someone, the Investigator will suggest a fair compensation for that damage. It must also be fair to the affected person.

Protection of Complainer or Whistleblower

1. The complainer can request anonymity if they feel that disclosing their identity could lead to damage but would need to give adequate evidence or facts to show that it is reasonable to believe there has been some corruption, legal transgression, or violation of rules, restrictions, Code of Conduct, or business ethics. However, disclosing their identity will enable the complaint to be processed more quickly.

2. The information related to the complaint will be treated by the Company with confidence and will be disclosed only with consideration of safety and potential damage to the complainer or related people. In addition, staff responsible at each level must maintain utmost confidentiality and not disclose the information to anyone. Breach of confidentiality will be considered as disciplinary violation.

3. The Board of Directors, CEO, or designated person may institute protection measures for the complainer as they deem fit if they feel that the case may cause damage or danger to the complainer that resulted from this complaint.

4. A person who treats others unfairly, discriminates improperly, or causes damage to others as a result of the complaint, providing evidence, or whistle blowing with regards to legal transgression, violation of rules, regulation, Code of Conduct, or business ethics extending to that person being a plaintiff, witness, provider of testimony or any form of cooperation to the judge or government agencies will be considered as having committed a punishable disciplinary violation. In addition, the punishment will be in accordance with the law.

5. The affected party may receive compensation in a fair and suitable manner.

This Whistleblower Policy was reviewed and approved by the Board of Directors at Meeting No. 5/2025 on November 12, 2025, and has been effective from November 12, 2025.

- Kittisak Amornchairojkul -
(MR. KITTISAK AMORNCHAIROJKUL)
Chairman of Board of Directors