



The Announcement of Board of Directors,
Ratch Pathana Energy Public Company Limited
No. 3/2025
Whistle Blowing Policy

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Ratch Pathana Energy Public Company Limited (“the Company”) emphasizes conducting business under good corporate governance and business ethics with a well-managed, transparent, and accountable management system, to support both internal and external stakeholders in having channels for reporting concerns or complaints regarding corruption, violation of business ethics or related laws and regulations. Such reports will serve as guidelines for the consideration and management of complaints, including providing protection to those involved in the complaint management process in a fair manner, including providing a resource of information for enhancing management practices to be more thorough and efficient, the Board of Directors’ meeting of Ratch Pathana Energy Public Company Limited No. 8 /2025 , held on November 21, 2025 has approved the Whistle Blowing Policy of the company and subsidiaries. The details are as follows.

1. Objectives

- 1.1 To establish channels for complaints and encourage employees and stakeholders to confidently provide information to report clues of acts that violate laws, regulations, announcements, rules, good corporate governance code, business code of conduct, or supplier code of conduct; any corruption that occurs; as well as violations of human rights, discrimination and harassment of the company’s stakeholders. These channels also serve to receive comments or suggestions from stakeholders who have been or may be affected by the group’s business operations.
- 1.2 To protect those who provide information, cooperation, or assistance in investigating complaints—including complainants acting in good faith and respondents who have not yet been determined to have committed wrongdoing—the company implement take measures to prevent these individuals from being adversely affected and will handle complaints appropriately, fairly, and in accordance with the principles of good governance.
- 1.3 To establish transparent and fair practices for investigating misconduct and fraud.
- 1.4 To establish guidelines for investigating misconduct and corruption in a transparent and fair manner, as well as to promote business operations that are auditable and in compliance with laws, regulations, rules, good corporate governance code, business code of conduct, and supplier code of conduct, in order to prevent risks and reduce the likelihood of damage to the Company group and stakeholders.

2. Scope of Policy

Whistleblowers or complainants are able to report significant matters or complaints that may have negative impacts on the company, as follows:

- 2.1 Violation of laws, regulations, rules of governing authorities overseeing the Company and/or the Company's articles of association, policies, rules, business ethics, including maintaining trade secrets.
- 2.2 Discrimination or violation of human rights, such as bullying, disturbing, harassing, threatening, discrimination based on race, religion, or gender, or any other act that constitutes unfair treatment affecting all stakeholders, including vulnerable groups such as children, persons with disabilities, the elderly, pregnant women, LGBTQ+, minorities, indigenous peoples, migrants, etc. This does not include cases related to human resource management, such as interpersonal conflicts or unfair performance evaluations, which can be reported to supervisors or contact the Human Resource department staff.
- 2.3 Corruption and fraudulent acts, such as bribery, embezzlement, misuse of authority for personal gain, conflicts of interest, or any actions that constitute a conflict of interest.
- 2.4 Actions causing harm to the company, acts that negatively impact the environment or the community.

In cases where the respondent is personnel of a joint venture or associates, if that company has a complaint management policy, the process specified by that company shall be followed. However, if there is no such policy, the company supports applying this policy to the extent that it does not conflict with the laws of the country where the joint venture or associate company operates.

Cases that require clarification of facts to external agencies or organizations are not within the scope of this Whistleblowing Policy. The Company shall appoint a representative to provide the necessary clarification.

3. Whistleblowing Channel

The Company provides employees and stakeholders an opportunity to report misconduct, illegal activities, corruption, or unethical behavior by the company's employees, as well as actions that could pose problems or cause harm to the company. Additionally, it includes the submission of complaints in cases where employees or stakeholders experience violations of rights or unfair treatment through the channels and processes established by the company. The details are as follows:

1. Direct notification in word or written to the direct supervisor. If it is not considered, the higher-level supervisor or the human resources management and development division manager should receive the notification instead



2. Suggestion box
3. Email or company's website:
 - 3.1 Via Website: <https://www.ratchpathana.com>
 - 3.2 Via Email

Contacts	E-mail Address
The Board of Directors	directors@ratchpathana.com
The Audit Committee	auditcommittee@ratchpathana.com
The Corporate Governance and Risk Management Committee	cgcommittee@ratchpathana.com
The Managing Director	MD@ratchpathana.com
Human Resource Management and Development Division	hrmanager@ratchpathana.com

4. The petition and information can be sent by postal service to the Chairman of each committee (Chairman), Managing Director, and Human Resource and Administration Department. The address is as follows:

Ratch Pathana Energy Public Company Limited
636 Moo 11, Sukhaphiban 8, Nongkham sub-district
Sriracha District, Chonburi 20230

In addition, the Company will confidentially keep related information and prioritize the security of the complainant, except when disclosure is required by law.

4. Complaints should include the following details:

- 4.1 Name-surname, address, telephone number or mobile number, and email of the complainant, for the purpose of notifying the results of the investigation. The complainant may choose to remain anonymous if preferred.
- 4.2 Name-surname of the person(s) being complained about, and their address (if any)
- 4.3 The date of the complaint (day, month, and year)
- 4.4 The date, month, year, and location where the complainant observed the behavior or incident.
- 4.5 The circumstances or details of the allegation against the person being complained about, within the scope of the complaint.
- 4.6 Supporting documents or evidence related to the complaint (if any).

5. The process of Investigation of the Corruption and Violation

- 5.1 The complaint receiver is tasked with receiving and conducting initial assessments, regardless of whether the complaint is anonymous or includes the complainant's identity.

- 5.2 When the complaint receiver has assessed and determined that the information received may involve misconduct or corruption, the receiver will notify the complainant accordingly if the letter discloses their identity, and inform the Managing Director about the complaint. Additionally, the complaint will be registered for further action.
- 5.3 In case the complaint is an employee, the Managing Director will appoint at least three members to be responsible for conducting the investigation. The committee will have the authority to invite related individuals to provide information and request documents from the involved parties. The direct supervisor of the accused will not be part of the investigation committee and must cooperate with the investigation as requested.

In such cases where the complainant is a director, the Managing Director, or a Subordinates under the Managing Director, the chairman of the Audit Committee shall appoint the investigation committee

- 5.4 The investigation committee is to gather evidence, summon individuals knowledgeable about the issues related to the complaint to provide testimony, conduct investigation, and carry out any other necessary actions with thoroughness and fairness to all involved parties.
- 5.5 The investigation committee is responsible for report the investigation result to Managing Director or Chairman of the Audit Committee and then the Audit Committee has to report the Board of Directors.
- 5.6 In the event that the respondent or the complainant disagrees with the investigation results, they have the right to submit an appeal to the Audit Committee within 15 days from the date they receive the investigation results, through the complaint channels specified in Item 3. The Audit Committee shall consider the appeal within 30 days from the date the appeal is received and notify the appellant of the result as soon as possible. The decision of the Audit Committee on the appeal shall be final, unless new and material evidence is subsequently presented.

6. Measures for the Protection of Complainants

- 6.1 The Company will not disclose the name-surname, address or any other information that could identify the whistleblower, complainant, or individuals cooperating in the investigation of the allegations.
- 6.2 The company will keep the information of the whistleblower, complainant, and the accused confidential. Information will only be disclosed when necessary and restricted to personnel responsible for investigating the matter. The disclosure will be considered to assess based on security and potential harm of the whistleblower,

complainant, individuals cooperating in the investigation and the sources of information or related parties.

- 6.3 Whistleblowers, complainants, and individuals cooperating in the investigation, whether employees or external parties, will have their rights protected to ensure their safety and prevent retaliation or mistreatment by the accused.
- 6.4 The company will not take any actions that are unfair to whistleblowers, complainants, or individuals cooperating in the investigation, such as changing job positions, job descriptions, workplaces, imposing leaves, or making threats.
- 6.5 Individuals who have been harmed will receive appropriate and fair compensation for their damage through a proper process.

7. Remediation

7.1 The Company places utmost importance on maintaining the confidentiality of complainants and affected individuals to build trust and ensure safety in reporting incidents or filing complaints. The Company implements several approaches to achieve this, as follows:

7.1.1 Non-disclosure of names and personal information

- Not disclosing names, surnames, positions, departments, or any information that can identify an individual.
- Using coded identifiers instead of the complainant's name or personal information for record-keeping and reporting

7.1.2 Defining access rights to information

- Restricting access to information to authorized personnel only.
- Using a login system and password to access complaint information.

7.1.3 Secure data retention

- Storing data in a system with encryption.
- Using a storage system with data backup and protection against unauthorized access.

7.1.4 Training for relevant personnel

- Providing ethics and confidentiality training to relevant personnel.
- Having clear guidelines for handling complaint information.

7.2 Using secure complaint channels

- Provide anonymous complaint channels such as complaint boxes, websites that do not require login, and dedicated email addresses.

7.3 Confidentiality Agreement

- Require staff to sign a confidentiality agreement before performing work related to complaint information.

7.4 Monitoring and reviewing the use of information

- Maintain a system for recording data access (Audit Trail).
- Regularly monitor data usage.

8. Measures for correction and remediation.

The Company has established a mechanism for remediation in cases where the operations cause negative impacts. These include apologies, assistance, rehabilitation, compensation, and/or other forms of action, along with penalties, prevention measures, and corrective actions to prevent recurrence.

8.1 Remediation and corrective measures.

1. Addressing and preventing issues to mitigate impacts.
2. Direct and formal apology to the affected individuals, and deletion of false information.
3. Monetary and non-monetary compensation as appropriate, as follows:
 - Provision of consultation services.
 - Provision of psychological support to affected individuals.
 - Opportunities for development and access to other benefits.
 - Providing financial compensation to affected individuals as appropriate, including expenses related to travel facilitation.
 - Assistance in accessing other forms of remediation.
4. Conducting investigation and imposing disciplinary actions in accordance with applicable regulations or laws to establish standards and ensure fairness.
5. Initiating legal proceedings if the violation constitutes a criminal offense.
 - Review and amend policies or practices that may enable violations.
 - Establish effective mechanisms for monitoring and whistleblowing.
 - Provide training and education to personnel on human rights.

8.2 Monitoring Activities

1. Verifying that the remediation measures have been fully implemented and are effective.
2. Assessing the long-term impacts on the affected individuals and improving operational practices to prevent recurrence.

9. False whistleblowing or complaints.

If the statements or information provided by a whistleblower or complainant are proven to be fraudulent, resulting in harm to an individual or the company, the company will take disciplinary action in accordance with work regulations and/or pursue legal action if the individual is an employee. In cases where the harm is caused by an external party, the company reserves the right to take legal action against that individual.



10. Monitoring and reviewing the policy

The company will monitor, manage, and ensure compliance with this policy by reviewing it regularly to keep it up to date and aligned with relevant regulations and laws as necessary and appropriate, at least once a year.

Announced on November 21, 2025

Sujarit Patchimnan
(Mr. Sujarit Patchimnan)
Chairman