



Whistleblowing Policy

Control Information

Approved on:	Approval by the Board of Director on 11 August 2016
Function:	Guidance
Accountability:	Corporate Sustainability Development Committee
Monitoring and	Office of Internal Audit
Reporting function:	

Introduction

Thai Beverage Public Company Limited and its subsidiary companies (“**ThaiBev**”) encourages all employees to report any well-founded suspicious wrongdoings as soon as practically possible. Suspected wrongdoings within ThaiBev will be taken seriously and employees will not be victimized or subject to any detriment if he/she raises legitimate concerns in good faith.

Scope of the Policy

The Whistleblowing Policy (“**Policy**”) applies to all ThaiBev’s directors (“**Directors**”), all ThaiBev’s executive officers (employee ranging from Assistant-Vice President level up to the President and CEO) and employees (“**Employees**”).

1. Purpose

- 1.1 The Policy provides a procedure to ensure that concerns about suspected wrongdoings within ThaiBev (“**Whistleblowing**”) are raised and handled timely and appropriately. It applies to Directors

and Employees working at all levels of the organisation as identified in ThaiBev's regulations regarding the classification of positions, wages and salaries, which currently consist of contracted Employees, daily Employees and monthly Employees.

1.2 Employees are encouraged to report genuine concerns which he/she may have about suspected wrongdoings in accordance with the Policy, in the knowledge that his/her concerns will be taken seriously and investigated as deemed appropriate. ThaiBev will support him/her, provided that he/she raises genuine concerns in good faith, even if they turn out to be mistaken. Reasonable measures shall be taken to protect Directors and Employees from detriment, retribution or harassment from doing so.

2. Definition of Whistleblowing

Whistleblowing is the disclosure of information relating to wrongdoings or dangers at work. This includes criminal activities and other unlawful conducts, failure to comply with regulatory requirements, financial irregularities and actions that are dangerous to the health and safety of people or to the environment. For example, insider dealing, bribery, and forgery would constitute wrongdoing.

3. When to apply the Policy

Directors and Employees shall proceed in accordance with the Policy if he/she has a genuine concern about past, current or future wrongdoings or dangers. It may not always be clear whether the conduct which

concerns Employees amounts to wrongdoing and Employees will need to form his/her own judgment. ThaiBev encourages Employees to report Employees' concerns when Employees are in doubt.

4. How to report a concern

- 4.1 If Director(s) has concerns, Director(s) should consider report to the Chairman of Audit Committee.
- 4.2 If Employees have concerns, Employees should consider the process set out below and report it through the recommended channel(s) in writing with Employees' name and contact details.
- 4.3 Employees should raise his/her concerns in writing with Employees' supervisor/department/division/office head in the first instance. Employees' supervisor/department/division/office head should assist Employees in finding a way of resolving the Employees' concerns quickly and effectively, or he/she may refer the matter to the designated persons as stated in the clause 4.4.
- 4.4 Where the matter is more serious, however, or Employees feel that Employees' supervisor/department/division/office head has not addressed Employees' concerns, or Employees prefer not to raise them with such persons for any reason, Employees should raise the concerns to the Office of President at "Whistleblowing@thaibev.com". The President and CEO will consider and take further necessary action and also report to the Chairman of the Board of Directors.

ThaiBev may nominates different individuals as points of contact from time to time. Any changes in points of contact will be notified to Employees.

4.5 If ThaiBev decides that it is necessary and appropriate, a meeting may be arranged with Employees to discuss Employees' concerns. In these circumstances, ThaiBev will prepare a written summary of Employees' concerns and provide Employees with a copy after the meeting. Employees may bring a colleague to attend the meeting, but Employees' colleague must respect the confidentiality of Employees' disclosure and any subsequent investigation.

4.6 Any Directors and Employees who have any personal interest in the matter is obligated to declare it upon raising the concerns.

5. Confidentiality

ThaiBev encourages Employees to raise any genuine concerns openly under the Policy. However, ThaiBev will not respond to disclosures made anonymously, since it will make proper investigation difficult or even impossible, and may lead to groundless accusations. If Employees would like to raise Employees' concerns confidentially, ThaiBev will take reasonable steps to keep Employees' identity secret. Disclosure of Employees' identity may, however, become unavoidable in the case of an investigation by the government officials or court proceedings.

6. How ThaiBev will handle the matter

- 6.1 Once the Director(s) has reported his/her concern under the clause 4.1, the Chairman of the Audit Committee will consider and take necessary action.
- 6.2 Once Employees have reported his/her concern, the matter will be assessed to determine the proper action to be taken, which might include internal investigation or a referral for external investigation. Employees will be informed who is responsible for handling the matter, how the person can be contacted and whether any further assistance may be needed from Employees. Employees may, for example, be required to attend additional meetings in order to provide further information.
- 6.3 ThaiBev may, where confidentiality allows, give Employees feedback on the matter, including the progress of the investigation and likely timescale, but ThaiBev is not obliged to do so. Nonetheless, in the case where confidentiality is of concern, it may hinder ThaiBev from providing Employees with any details of the investigation or disciplinary punishment which may be the result of the whistleblowing action. Employees must treat any feedbacks given to Employees about the investigation as entirely confidential.
- 6.4 If it is considered more appropriate to deal with concerns of Employees as a grievance matter as stated in the “Employee Handbook of ThaiBev”, Employees will be informed accordingly. In

this case, Employees' concerns will be further submitted through the responsible departments or divisions or offices.

6.5 If Employees are dissatisfied with the manner in which ThaiBev has dealt with any concerns Employees have reported, or with the outcome of an investigation, Employees may contact any other designated persons set out in the clause 4.4. The persons may carry out further investigations as deemed appropriate.

7. Warning on misuse of the Policy and protection to the whistleblower

7.1 Any complaint made which is later found false, or in bad faith, or with malicious intent, or in a careless manner, or for personal benefit is considered a serious violation. Such action is considered gross misconduct which leads to disciplinary actions as stated in the topic of the disciplinary and penalties in the "Employee Handbook of ThaiBev".

7.2 ThaiBev will not tolerate harassment or victimisation of Employees raising a genuine concern under the Policy and any person involved in either threatening or retaliation against a whistleblower will be subject to disciplinary action(s). If Employees are harassed or victimised in any way, Employees are advised to inform the matter to the person responsible for the investigation of the matter so that appropriate actions may be taken.

8. External reporting mechanism

The objective of this Policy is to determine an internal mechanism for submitting report, conducting an investigation and correcting any suspicious wrongdoings within ThaiBev's workplaces. It is recognised, however, that there may be circumstances where Employees feel that Employees should properly report matters to external bodies, such as regulators or the police if he/she feels that his/her safety and health may be compromised or; if he/she is unable to discuss the matter internally with one of the designated persons named in the clauses 4.3 and/or 4.4 or; if such matter involves a serious crime.

Whistleblowing concerns usually relate to the conduct of Employees. However, they sometimes involve actions committed by a third party, such as a customer, a supplier or a service provider to ThaiBev, Employees are strongly advised to first internally raise a concern in good faith to the one of the designated persons as per the clauses 4.3 and/or 4.4. Nevertheless, after the Employees have raised their concerns if he/she still reasonably believes it relates mainly to an action of that third party and it is under responsibility of that third party as stipulated by law, may raise a concern in good faith with the related governing authorities. Unless required by the laws, Employees are advised to internally raise a concern in good faith, where he/she reasonably believes it relates mainly to an action of that third party and it is legally under responsibility of that third party. In case Employees are in doubt, Employees should contact one of the designated persons named in the clauses 4.3 and/or 4.4 for guidance in the first instance.

Please note that it is inappropriate for Employees to go to the media with a concern about suspected wrongdoings.

9. Seeking independent advice

Any inquiries regarding the Policy, Employees may discuss them (without being required to make a formal report) with any of designated persons named in the clauses 4.3 and/or 4.4. Employees can, of course, also seek advice from a lawyer of his/her own choice and expense.

The implementation of the Policy reinforces relevant guidelines and policies.