

Metro Systems Corporation Public Company Limited

Whistleblowing and Complaints
Regulation

PRINCIPLE

The Company conducts its business in accordance with good corporate governance principles and considers all stakeholders, ensuring fair and equal treatment without exception. The Company has provided an opportunity for stakeholders both inside and outside the organization to report leads or complaints to the Company. In order to encourage the Company's personnel to conduct business correctly, transparently, fairly, and can be audited, including to enable stakeholders to participate in effective monitoring of the Company's interests.

WHISTLEBLOWING AND COMPLAINTS CHANNELS

Any person seeing any suspected acts of corruption, acts of conflict of interest, unlawful act, acts of violations of good corporate governance principles, failure to comply with the code of conduct, disrespect of human rights, inaccurate financial reports, or a defective internal control system

INQUIRY OR REPORT CAN BE SUBMITTED TO THE PERSON RESPONSIBLE AS A FOLLOWS:

Supervisors of the department

Internal Audit Manager Independent Director

Audit Committee

The Company has assigned the Compliance Department, which is under the operation of the Company Secretary, to act as the complaint handling unit in the event that any behavior or event that may be in violation of compliance with the Company's rules, policies, or any suspected behavior that is contrary to the principles set out by the Company is encountered, which reports on any leads or complaints can be made directly via these channels:

By Mail: Company Secretary

Metro Systems Corporation Public Company Limited

No. 400 Chalermprakiat Rama IX Road, Nong Bon,

Prawet, Bangkok 10250

Telephone: 0-2089-4124

E-mail: corporatesecretary@metrosystems.co.th

Company Website: https://ir.metrosystems.co.th/complaint-channel/

COMPLAINT PROCESS

1. Fact Gathering

The complaint recipient will gather facts related to corruption, acts of conflict of interest, illegal acts, violations of the principles of good corporate governance, non-compliance with the company's code of conduct, violation of human rights, inaccurate financial reporting, or the defective internal control system by themselves.

2. Data Processing and Filtering

The complaint receiver would proceed with data processing and filtering to consider the most appropriate process and method in dealing with each complaint. The person would be allowed to directly proceed with data processing and filtering or assign such duties to the Investigation Committee on his behalf prior to proceeding with data filtering. The Investigation Committee would be appointed by Chief Executive Officer or the Board of Directors depending on situations as appropriate.

3. Investigation

In the event that the administrator of the complaint investigates the facts and finds that the complainant is actually guilty, in the case of an employee of the Company, he or she shall be subject to disciplinary action under the Company's regulations. However, if he or she is a third party, the Company shall bring legal action against that person based on the damage caused to the Company.

4. Reporting

The complaint receiver would be responsible for reporting of an investigation result to the employee in case where he was considered the whistleblower. In case where it was an important issue and had caused direct impact to the Company, it is suggested to report to the Top Management of the Company, the Audit Committee, or the Board of Directors, while seeking ways to prevent reoccurrence of the said case.

5. Consideration period

For the collection of facts, processing, and screening of information, including the investigation of facts, it will take approximately 30 – 60 days, depending on the difficulty and complexity of finding facts, on a case-by-case basis. In the event that the complainant discloses himself/herself, he/she will be notified within seven working days from the date of conclusion of the investigation.

MEASURES FOR PROTECTION OF COMPLAINANT AND INVESTIGATOR

The complainant, those who cooperate in investigation, and investigator would be offered protection in accordance with the following criteria:

- The complainant or the person cooperating in the investigation can choose not to disclose themselves if they believe that disclosure would cause any insecurity or damage. The Company can report its progress, clarify facts to know or mitigate the damage more conveniently and quickly.
- 2) On the whistleblower or the person cooperating in the investigation, the company will not disclose the name, surname, photograph, or any other identifier information of the informant and will conduct an investigation of the truthfulness.
- 3) The complaint recipient must keep the relevant information confidential and disclose it as necessary, taking into account the safety and reputation of the complainant or the person cooperating in the investigation, the source of the information, or the related person.
- 4) In cases where the whistleblower, the complainant or the person cooperating in the investigation think that they may be unsafe or troubled by any possible damage, the whistleblower, the complainant or the person who cooperates in the investigation may request the Company to prescribe appropriate protection measures with consideration of the Chief Executive Officer, or the Company may prescribe protection measures without request if it is deemed that a matter may likely cause damage or insecurity.
- 5) Those suffering the damage will be alleviated through appropriate and fair procedures through review of the Investigative Committee.
- 6) The complainant, person involved in investigation, or those denying violations of the Code of Conduct or corruption will be protected by the Company and will not cause or constitute a reason for demotion, termination of employment, punish, give negative effect or take any action that is harmful to such persons.

FALSE REPORTING

If the Company finds that any whistleblowing or complaint with evidence proving to be an act of dishonest, false, and intent to cause damage, in the case of being an employee of the company, he will be disciplined according to the Company's regulations. If it is a third party who has acted to cause damage to the company, the Company will consider legal action against that person as well.

Whistleblowing and Complaints Regulation has been approved by the Company's Executive Committee

