



Asia Hotel Public Company Limited
Policy on Reporting a Clue and the Protection of the Complainant

Asia Hotel PCL has a policy of giving a clue on an offense or misconduct or behavior that may imply dishonesty, corruption or misbehavior of the people within the organization from its employees and all the vested interests. In addition, it has a mechanism in protecting the whistleblower and prioritization on collecting information, clue and complaint to be kept confidential and to build confidence to the complainant with the following details:

1) Scope of reporting a clue or filing a complaint

1.1 When there is a question or discovery of a violation of the good practice in the following matters:

- Violation on following the principles and guidelines of the policy supervising good governance.
- Violation of the rules, regulations and bylaws of the company.
- Being treated unfairly during working.
- Commission of misconduct and corruption.

1.2 Discovery of an action that causes a suspicion and bad effects to the company.

2) Channels on reporting a clue or complaint

2.1 Direct superior of the employees

2.2 Personnel manager of the company

2.3 E-mail address: acboard@asiahotel.co.th

2.4 Mr. Suwat Dusitrojnanawongsa

Independent Director and Chairman of Audit Committee

Asia Hotel PCL

2.5 Mr. Surapong Techaruvichit

Managing Director

Asia Hotel PCL

3) Consideration on the clue or complaint

3.1 Details of the clue or complaint must be true, clear or sufficient to lead to finding facts for further operations.

3.2 The informant or complainant can choose not to reveal their name, address, contact telephone number, if they deem it can cause a security concern or any damage. However, the disclosure of identity can help the case to progress or inquire about the beneficial information additionally, and giving facts or relieve damage conveniently and more rapidly.

3.3 The received information shall be considered confidential and no disclosure of the name of the informant or complainant to the public without prior consent.

3.4 The informant or complainant shall be protected of their right, regardless of being an employee or a third party.

3.5 The receiver of the clue or complaint and the relevant person with the process on verifying the facts has to keep the information secret and disclose only as necessary, considering the safety and damage to the informant or complainant or cooperator in the verifying the facts and the source of information or the relevant person.

4) Relevant People Group

4.1 Informant means the person who reports a clue or complaint.

4.2 Coordinator on the complaint means the person who receives the complaint, collects the basic information and the summary on the operations is the secretary of the company.

4.3 Supervisor of the complaint means the direct superior of the complained person or the higher superior of the complained unit.

4.4 Supervisor of the disciplinary rules means the personnel department

4.5 Managing director

4.6 Audit committee

5) Procedures

5.1 After the coordinator has received a complaint, they shall proceed as follows:

- Submit the matter to the supervisor on the complaint, proceed to find facts and give an order according to the existing authority.
- Submit a copy of the matter to the personnel department for acknowledgement initially to prepare an advice according to the discipline or other matters.
- Submit a copy to the managing director and the audit committee for acknowledgement.

5.2 Gathering of facts and giving an order

5.2.1 The complaint supervisor shall proceed to find facts and give advice for the involved persons to behave or act suitably later. If there is a disciplinary action, it can be made in consultation with the personnel department, so it shall comply with the punishing measures as well. However, if the complaint supervisor has no power to order a punishment, it shall be presented in the hierarchical chain of command up to the authorized persons as the case maybe. Then it shall send the results on finding the facts, operations and punishment as the case maybe to the managing director via the hierarchical superiors for acknowledgement or an order

5.2.2 In the case the complaint is anonymous and cannot find additional information sufficiently, the complaint supervisor shall send a report on the verification of the information and comment to the managing director via the hierarchical superiors for suitable guidelines further. However, if the managing director deems it cannot proceed on the complaint, which the case can be closed, he shall inform the complaint supervisor for acknowledgement and report to the inspection committee.

5.2.3 In a situation that the complaint supervisor has verified the facts and found the complained person is innocent, or it is a matter of misunderstanding or has given advice to the complained person or the relevant person to have suitable behavior or practice, so the matter should be closed without any punishment. The complaint supervisor shall present such the matter to the higher hierarchical superior for approval to close the matter with a copy to the coordinator who receives the complaint and inform the complainant for acknowledgement, and report to the managing director as well as the inspection committee.

5.3 Investigation of the facts and punishment

- 5.3.1 In the case that the complaint supervisor and the personnel department have investigated it and deemed appropriate to take a disciplinary action, the personnel department shall present the matter to the managing director.
- 5.3.2 After the result of the order by the managing director, it shall notify the supervisor on the complaint to take further actions.
- 5.3.3 The punishment shall comply with the rules of the company and/or the relevant laws.

5.4 Notifying the summary to the whistleblower or complainant and remedy

- 5.4.1 The coordinator on the complaint shall notify the results on the operations to the complainant and record the results on the operations related to the complaint by presenting to the inspection committee on a quarterly basis.
- 5.4.2 The coordinator on the complaint shall follow up the result on the remedy (if any) and report to the managing director and the inspection committee for acknowledgement.

6) A bogus complaint or wrong channel

In a situation that the complaint giving a statement or any information that can be proven to be bogus or is in the wrong channel, if it is the case of a company's employee, they shall be faced with a disciplinary action. However, it is an outsider who does that to inflict damage, so the company shall consider prosecuting them as well.

7) Responsibility of the higher superior

In the case the supervisor on the complaint ignores or refuses to follow this policy, the higher superior may be faced with a disciplinary action as well.

8) Measures on protecting the rights of the whistleblower or complainant

8.1 The company shall keep the information and the identity of the whistleblower or complainant and the complained person confidential.

8.2 The company shall reveal the information only as necessary by considering the safety and damage to the informer, source of information or the relevant persons.

8.3 The injured person may be relieved of the damage by the suitable and fair process.

8.4 In the event that the complainant or cooperator on verifying the facts deems that they feel unsafe or may suffer damage, they can request the company to set up suitable and protective measures by themselves, or the company may set up protective measures by the complainant or the cooperator on the verification of the case without a request, if it is deemed the case can cause suffering or damage or danger.

8.5 The company shall not do anything that is unfair to the whistleblower or complainant, regardless of by reshuffling the position, job characteristics, workplace, suspension, and intimidation, working disturbance, termination or other actions that are unfair to them or the cooperator in the verifying the facts.
