

# Whistleblowing Policy

Group

## Framework

The Whistleblowing Policy comprises the following sections:

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3. Definitions
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### 1. Objective

This Whistleblowing Policy is established to provide a mechanism to voice or report concerns of wrongdoing related to the business, operations, transactions, or activities of Siam City Cement Public Company Limited (“the Company” or “SCCC”) and its subsidiaries (“Group Companies”), whether directly and indirectly held (collectively referred to as “the Group”).

The Policy sets out the principles, procedures for reporting, channels for reporting, and investigations protocols for incidents reported via the reporting channel.

### 2. Scope

This Policy applies to all Employees, Management, and Directors, as well as any person who represents or performs work on behalf of any entity within the Group.

The whistleblower can report wrongdoing or concerns about potential violations of the law, Code of Business Conduct, or Company policy. We encourage the early reporting of matters of serious concern which may affect the professional and compliant operation of its businesses and reputation. These are examples of the type of matters that should be reported including but not limited to the following:

- a) a criminal offence; for example, fraud, bribery, conflict of interest;
- b) a failure to comply with any legal, regulatory obligations, and the Code of Business Conduct;
- c) concealment of any of the above;

d) retaliation actions to any staff member arising from investigations or other whistleblowing processes.

Any complaints related to products and services of the Group shall not be accepted in the whistleblower system but shall be raised to other appropriate channels or directly with the concerned business unit.

### 3. Definitions

Employee	Every employee including the management
Whistleblower	An employee or any other person who reports wrongdoings or incidents that he/she has observed to the reporting channel
Wrongdoing	Illegal or dishonest behavior or activity
Incident	Concern of misconduct, violation of laws and regulations or Company policies, unethical behaviors or activities
Reporting Channel	The channel to report a concern, misconduct or unethical activity
Screening Committee	The Screening Committee is appointed by the Head of Group Internal Audit and Compliance and acknowledged by SCCC's Audit Committee and has the responsibility to screen cases raised through the reporting channel
Investigation Team	The Investigation Team consists of a pool of members appointed by the Group CEO of the company where the incident takes place
Subject	The person whom the whistleblower has reported his/her wrongdoing

### 4. Responsibilities

**Reporting channel**, an independent third-party hotline provider, will report every incident to the Screening Committee after the incident is reported. If the concern or misconduct is against a member of the Screening Committee, the report will not be sent to that member.

**Screening Committee** shall preliminary screen the incident raised through the reporting channel whether the incident is valid (credible) or groundless and provide the recommendation to the Group CEO of the company where the incident takes place. The Screening Committee also has a responsibility to communicate with the reporting channel on the progress of the incident. Incidents which are groundless will be supported by a rationale.

Credible incidents will go for fact-finding or go through the investigation process depending on the complexity and severity of the incident.

Head of Group Internal Audit and Compliance will act as the Head of the Screening Committee and shall propose qualified members to the Screening Committee.

**Chief Executive Officer (CEO)** of the company where the incident takes place shall determine, impartially, the creditability of the case and communicate or discuss with the Screening Committee and ensure an appropriate setup and flow of fact-finding or investigation. The CEO shall ensure that all concerns raised are dealt with fairly, thoroughly and in accordance with the policy.

**Fact-finding and Investigation Team** shall perform the following:

- a) Fact-finding and investigate the incident;
- b) Set out the steps for fact-finding and investigation;
- c) Conclude the fact-finding and investigation;
- d) Recommend the corrective and disciplinary actions; and
- e) Report to the Screening Committee

The Team shall engage and/or consult with other appropriate departments to investigate the incident.

All the incidents shall be reported or regular updates to the Screening Committee, until the incident is resolved. The need for an extension shall be granted by the Screening Committee.

All actions must be taken in accordance with the timeframe stated in the Whistleblowing Workflow (see Annex 2).

**All Managers** are responsible for ensuring that staff are aware of the policy and its application, and for creating an environment in which staff are able to express concerns freely without fear of retaliation.

**Employee** has a responsibility to raise concerns providing he/she has a reasonable belief that malpractice and/or wrongdoing has occurred.

**Whistleblower:** The Whistleblower shall report any incident in good faith to the reporting channel, try to disclose as much factual information of the incident and disclose his/her identity such that the investigation can take place quickly.

## 5. Policy Directives

- 5.1 Confidentiality:** Confidentiality of the incident and details of the whistleblower shall be strictly maintained. Sharing of information shall be subject to the approval of the Screening Committee.
- 5.2 Anonymity:** The whistleblower can report actual or suspected violations anonymously, where allowed by applicable law. If he/she makes a report anonymously, it is important to provide detailed information to facilitate a thorough investigation.

- 5.3 Good faith reporting:** Whistleblowers shall raise incidents in good faith, with no intention to hurt the subject.
- 5.4 No retaliation:** Whistleblowers shall be protected from retaliation, especially for cases which have been raised in relation to suspicious misconduct and reported with good faith but proven false later. A Whistleblower may ask for special custody or protection should he/she feel threatened in any possible manner. Should the subject mistreat or harm the Whistleblower for disclosing the incident he/she shall be penalized as it is an illegal offence.

## **6. Compliance and Consequences for Non-Compliance**

All entities within the Group, including their Employees, Management, and Directors, as well as any individuals who represent or perform work on behalf of the Group, must fully comply with this Policy. They are also responsible for ensuring that appropriate resources are allocated to support its effective implementation. Regular reviews will be conducted to ensure that the implementation of the Policy remains robust, suitable, and effective.

Employees shall not abuse the reporting channels or make false reports to cause intentional harm to their colleagues. Should there be an investigation; the employee shall fully cooperate with the Investigation Team. The employee will be subject to disciplinary action should there be any form of retaliation, abuse of the reporting channel, falsifying of reports or lack of cooperation during an investigation.

In the event of proven bad faith and/or falsifying reports raised by whistleblowers who are not the Group's employees, the CEO of the Group Company where the incident takes place shall consider an appropriate action to be taken further, including but not limited to a legal action, in order to protect the Group's business and reputation.

## **7. Policy Measurement Metrics**

The Head of the Screening Committee shall report the summary of all cases reported and the result of the investigation together with the Management's actions to the Group CEO, Group CFO, and the Audit Committee.

## **8. Policy Exemptions**

No exceptions to this policy are allowed unless clearly approved in writing.

Variations to this Policy shall be reviewed by the Document Manager and proposed to the Document Owner before submission to the Group CEO for approval.

## 9. References

- a) Code of Business Conduct
- b) Charter of the Screening Committee

- End of Document -

## Annex 1: Document Approval and Version History

### Document Approval

Approval Date	22 October 2025
Effective Date	22 October 2025
Next Review End Date	01 January 2028
Document Manager	Isiwat Kangwantanawat – Head of Business Process and Compliance Advisory
Document Owner	Thomas Natter – Group Internal Audit and Compliance
Approver	Ranjan Sachdeva – Group CEO
Document Location	INSEE Portal/Internal Compliance/Governance Documents

### Version History as the Group

The following table records all the revisions made to this document:

Version	Date	Description	By
1.0	27 May 20	Approved - Transfer to a new template and cancel PL-CEO0-GIAC-003	Aidan L.
	01 Jun 20	Effective	
2.0	17 Jun 21	Reviewed	Isiwat, Ranjan
	26 Oct 21	Approved	Aidan
	15 Sep 23	Reviewed	Isiwat, Thomas
	31 Oct 23	Approved	Aidan
	31 Oct 23	Effective	
	08 Aug 25	Reviewed	Isiwat, Thomas
	22 Oct 25	Approved	GEXCO
	22 Oct 25	Effective	

## Annex 2: Whistleblowing Workflow

### Whistleblower

- Report the incident through the reporting channel, INSEE Speak Up.
- The service provides by an independent third party.
- It is available 24 hours a day, 7 days a week.

Website: [inseespeakup.ethicspoint.com](http://inseespeakup.ethicspoint.com)  
 Toll Free: Indonesia 080 0150 3215  
 Sri Lanka 202 9137  
 Thailand 180 001 4577  
 Vietnam 180 040 0549

▼ 1 Business Day

▲ 6 Business Day

### Screening Committee

- Screen the incident and classify the concerns and evidence from the fact-finding into a) Misconduct – related to behavior b) Wrongdoing, suspicious of fraud or business process improvement.
- Advise the Group Company's CEO of the case related countries on the recommendations and the next steps.
- Monitor and follow-up on the progress of the case and communicate to the whistleblower through the 3rd party.

▼ 7 Business Day

### Group Company CEO

- Determine the creditability of the case and communicate or discuss with the Screening Committee.
- Appoint the Investigation Team.

### Group Company CEO and Screening Committee

Understand the case and make a final decision on the consequence management and corrective action to prevent the issues.

▼ 5 Business Day

▲ 30 Business Day  
(exclude the external forensic investigation)

### Investigation Team

- Investigate the incident.
- Regular updates to the Screening Committee, until the incident is resolved. The need for an extension shall be granted by the Screening Committee.
- Conclude the fact-finding and investigation including recommending corrective and disciplinary actions.
- Align the consequence management and the disciplinary actions with the support of HR and Legal.
- Submit the Examination Report to the Group Company CEO and the Screening Committee.