



## **Green River (Thailand) Group**

222 Moo. 4, T.Thachang, A.Bangklum, Songkhla 90110, Thailand  
Tel: +66 (0)74 328943-7, Fax: +66 (0)74 328947

### **Whistleblower Policy**

**Green River (Thailand) Group** (hereinafter referred to as the “**Company**”) has a policy and strives to listen to complaints from all employees and stakeholders either within or outside the organization in relation to good corporate governance and business code of conduct, corporate compliance or fraud reporting.

The Company commits to processing complaints with transparency, honesty and fairness equally including keep personal information confidential and provides measures to protect the sincere complainants and relevant witness. This is to ensure that the Company’s operations be efficient and conform with the principles of good corporate governance and compliance policy, also to prevent risks and increase the effectiveness of the early warning mechanism for safeguarding against damage that may occur to the Company and stakeholders.

The Company has established the whistleblowing framework as follows;

#### **1. Scope and conditions for consideration**

- (1) The clue information must be true, precise for further investigation. It could cover the behavior which is considered as severe offense, for example, corruption related to the Company both directly or indirectly, violation of the Company’s business ethics, intentional act to cause defamation, damages to the reputation or loss of benefit to the Company.
- (2) The information received will be kept confidential, where names of whistle blowers remained anonymous. However, the Company encourages whistleblowers to show themselves to the department receiving the information they are receiving. They should provide adequate information and evidence. The whistleblowers are protected under our measure regardless of our employees or the third party.
- (3) If the identity is disclosed, the Company will consider the existing fact or evidence to be adequate and precise. The information reported without sufficient witness, evidence or wrongful act for further investigation will not be considered. This should include the matter which has been considered through roughly and fairly, but without significant and reliable evidence.
- (4) The duration of processing depends on the complexity of the matter and adequacy of the evidence received from the whistleblower, as well as evidence and explanation of the complainant.

#### **2. Channels for reporting**

The company has provided channels for reporting information as follows:

- (1) Company website: [www.greenriverholding.com/contact-us/](http://www.greenriverholding.com/contact-us/)
- (2) Email: [HR@greenriverholding.com](mailto:HR@greenriverholding.com) or [GA\\_ADM@greenriverholding.com](mailto:GA_ADM@greenriverholding.com)
- (3) Postal mail to the “Administration & Secretaries” or “Head of Admin Office”

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- (4) Phone number: +6674 328955
- (5) Other channels which the Company has made available (if any)

### **3. Complaints shall be comprised of**

- (1) Name and surname, address, phone number, email address of complainant in order to reporting results, however, the complainant may choose to remain anonymous.
- (2) Name, surname and address of the person who is accused in the complaint (if available)
- (3) The date that the complaint is filed.
- (4) The date that the complained action took place
- (5) Factual information and description of complained actions which are within the scope mentioned above.
- (6) Documentary evidence relating to the complaints (if any)

### **4. Operation process**

- (1) After receiving a reporting via various channels provided, the Admin Office will record the matters and notify the whistleblower (if any).
- (2) The Admin Office is responsible for searching considering the cause of reporting in a primary stage, strictly to find out the truth within 30-60 days. Followings are the consideration criteria.
  - Simple case – the Admin Office and Human Resource proceed in accordance with the Company regulation and report to the Top Management.
  - Complex case and/or in doubt in severe offense – the Company will appoint a Fact Interrogation Committee which includes a supervisor from related departments, a delegation from Human Resource, Legal Department and at least one (1) director from other departments.
- (3) The fact interrogation process is summarized and reported to the whistleblower (if any). The operation result and penalty issued is reported to the Top Management for consideration and approval. Eventually, the Admin Office will collect and summarize the case and investigation result and submit to the Top Management on a quarterly basis. After that, the Top Management will report to the Board of Directors for acknowledgement.

The Company will correspond to the complainant in the following ways:

- To confirm receipt of complaints or registration for complaint filing.
- To request for additional details and information.
- To inform and update the progress or inform the result of the complaint consideration.
- Any other correspondence that is deemed appropriate.

### **5. Procedures for retaining records regarding whistleblower reports**

The Admin Office will seek to ensure that all whistleblower reports received by the Admin Office, together with all documents pertaining to the Top Management's or its designee's investigation and treatment of any such whistleblower report, are retained in a secure location for **at least Five (5) years**.



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If a whistleblower report becomes the subject of a criminal investigation or civil litigation is resolved, all documents related will be retained until such investigation or litigation is resolved, including all appeals.

### **6. Measure to protect whistleblower or those who participate in fact interrogation**

The Company refrains from any unfair treatment toward its employees, contractors or temporary staffs such as change of position, work scope, or place of work, suspend work, threatening, disturbing, dismissal or any other action defined as unfair treatment based on the ground that such person provide information, cooperate or help in good faith.

- (1) The whistleblower in good faith will be protected. A false reporting with an intentional to cause damages to the other, for example, a complaint on personal matter or a complaint made with an intention to cause division against within the organization, is subject to the disciplinary penalty under the work regulation, and will be prosecuted according to the law in order to protect the Company's reputation and those being accused.
- (2) The Company will not disclose name, surname, address or other information which identifies the identity of a whistleblower or those who participate in the fact investigation.
- (3) A recipient of information or a person involves in the fact investigation process must keep relevant information confidential and may disclose as deemed necessary, taking into consideration the safety and damages of the whistleblower or those who participate in the fact investigation process, source or information or associated persons.
- (4) In case a whistleblower or those who participate in the fact investigation feel unsafe or potential damages, such person may require from the Company to impose an appropriate protection measure. Moreover, when it is considered that the matter is likely to cause collateral damages or insecurity, the Company may impose a protective measure without request from the said person.
- (5) Any person that responses to the whistleblower or those who participate in the fact investigation process will be subject to the disciplinary action under the Company regulation.
- (6) Those who are suffered or damaged from the clue reporting process will be compensated by the Company with proper and fair treatment, case by case.

### **7. Periodic review of procedures**

The Admin Office will review the procedures outlined above and consider changes to such procedures periodically.

This policy shall be effective from now on.