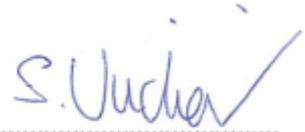


Whistleblowing or Complaint Policy

This document is effective from March 1 , 2023 onwards.



Mr. Pibulsak Atthaborwornphisarn
Chairman of the Audit Committee



Mr. Veerachai Suteerachai
Chairman of the Board

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Whistleblowing and Complaint Policy

The Company has implemented a policy for whistleblowing and complaints to demonstrate its commitment to conducting business with honesty and integrity in accordance with the principles of good corporate governance, decision-making, and ethical business-related actions. Therefore, this policy must be implemented with transparency, discretion, and caution to prevent any potential damage to the Company. The Board of Directors, executives, and all employees must operate with ethics and a code of conduct that emphasizes the prevention and suppression of all forms of corruption that may occur within and outside the company. If any violation is found against the Company's ethics and business ethics, no waivers will be granted.

Definition

Definition	Meaning
Whistleblowing	Refers to providing information to the Company about credible misconduct, including offenses or behaviors suspected of violating the law or regulations related to corruption, bribery of government officials, and business ethics and ethics.
Complaint	Refers to complaints, suggestions, comments, compliments, inquiries, or requests for information.
Complainant or Petitioner	Refers to Directors, executives, employees, stakeholders from all sectors, or outsiders.
Recipient of complaint or grievance	Refers to the Audit Committee or staff responsible for whistleblowing or complaints.
Investigation team	Refers to the appointed person, consisting of a chairman, committee member, and secretary, with duties and responsibilities for conducting investigations in accordance with the criteria, procedures, and timeframe specified to seek the truth in the matter that has been accused or complained.
Stakeholders	Refers to other individuals and groups (including shareholders, employees, customers, partners, communities, the government, and the environment) who add value to the Company or are interested in or affected by Company activities. Conforming to the needs and expectations of stakeholders will support the Company's sustainable success.

Scope of whistleblowing or complaints

All groups of stakeholders can report clues or make complaints when they see, suspect, or have reasonable grounds to believe that the behavior of directors, executives, and employees, or any person acting on behalf of the Company, violates the law, regulation, or business ethics of the company or inappropriate behavior or misbehavior that may indicate corruption, including cases of unfair operations.

Duties and Responsibilities

Board of Directors:

Prescribe policies and guidelines attached to the announcement on whistleblowing policy, including implementation of the policy in a concrete manner.

Executive and Secretary:

1. Provide operational procedures and whistleblowing channels, including protection measures for whistleblowers, and report information appropriately and clearly by proposing them to the Board of Directors for acknowledgment or approval (depending on the case).
2. Communicate the whistleblowing policy to all personnel of the company to ensure that they are aware of it, and help monitor and prevent corruption within the company, as well as communicate it thoroughly.
3. Acknowledge policies and guidelines for whistleblowing.

Workers and Employees:

1. Acknowledge and comply with this policy.
2. Report to the supervisor or inform via channels specified by the company when witnessing wrongdoing or when there is a reason to believe that an act of corruption has occurred.
3. Cooperate, provide information, or provide assistance to relevant agencies responsible for investigating facts based on informed clues.

Measures for Whistleblowing or Complaints

All groups of stakeholders, including shareholders, customers, competitors, creditors, the government sector, community, society, executives, and employees of the company, are able to report clues or make complaints when they find behavior of directors, executives, and employees that are inappropriate or contrary to the Company's business ethics and code of conduct. They can express opinions and notify clues of illegal acts or behaviors in the workplace that are incorrect or suspected to be inaccurate, or in the case of anti-corruption. The Company will listen to all complaints equally, transparently, attentively, and fairly to all parties. The Company will set an appropriate action period, maintain confidentiality, and proceed with caution. The Company will also provide protection for complainants and related persons to ensure fairness and prevent harassment in all manners. The Audit Committee and Company Secretary are responsible for receiving complaints about good corporate governance, ethics, and business ethics of the company by providing complaint channels and expressing opinions independently for the company to be informed of complaints against illegal actions, good corporate governance policy, company regulations, ethics, and business ethics of the company, which lead to damage to the property and reputation of the company. They also guide the development and sustainability of the company.

Whistleblowers or complainants must specify details of the matter to be whistleblowers or complaints together with evidence or information sufficient for investigation, and clearly state their name, surname, address, and contact telephone number (if desired). In the case of whistleblowers or complainants without the name, they can send the information to the following receiving channels:

- Opinion box of the Company.
- Company website: <https://www.asiametal.co.th>
- Notify via email channel at
 1. Audit Committee ia@asiametal.co.th
 2. Company Secretary secretary@asiametal.co.th
- Notify by mail Sealed letter at

Chairman of the Audit Committee or Chairman of the Board of Directors or Company Secretary
Asia Metal Public Company Limited (Head Office)
55, 55/1 Moo 2, Soi Wat Nam Daeng Srinakarin Road, Bang Kaeo Subdistrict, Bang Phli District
Samut Prakan Province 10540

Matters of Whistleblowing or Complaints

1. It is an unlawful act, corrupting the Company's regulations, or violating the ethics and business ethics of the company.
2. Irregular financial reports, defective internal control systems are matters that affect the interests or reputation of the company.

Principles of Action

All procedures are carried out strictly confidentially, known only to authorized persons involved and the name of the whistleblower or complainant must not be disclosed in any case, which must be strictly observed.

Measures to Protect Whistleblowers or Complainants

1. Whistleblowers or complainants will receive appropriate protection from the company.
2. Whistleblowers or complainants and related persons will receive fair treatment and not be bullied in any manner. If the company needs to disclose information, it will only disclose the necessary information, taking into account the safety and protection of whistleblowers or complainants.

3. The company will keep the information and identity of the whistleblower or complainant confidential by establishing a secret database system and imposing penalties on the person in charge of such information when the information is disclosed.
4. Access to such a database system can be done only with permission from the Chairman of the Board of Directors, the Chairman of the Audit Committee, or an authorized director who can sign on behalf of the company.
5. It is the duty of the supervisor or department head/department of all complained persons in exercising reasonable discretion to protect the complainant, witnesses, and persons who provide information in the investigation from any danger or harm arising from the complaint, testimony, or information.

Process and Time Taken When Receiving Clues or Complaints

The Board of Directors has assigned the Audit Committee to receive clues or complaints about actions that may cause suspicion of anti-corruption and against business ethics and code of conduct that occur within the company, either directly or indirectly through specified channels.

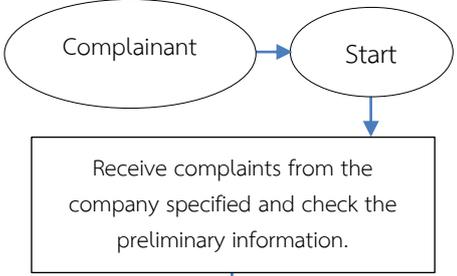
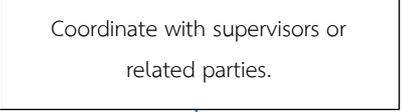
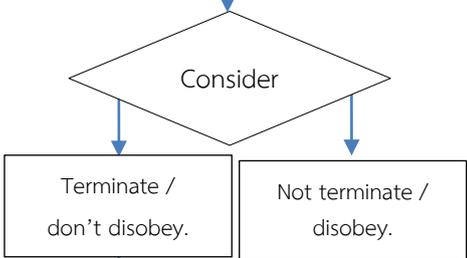
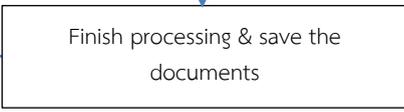
The whistleblower must submit the complaint to the complaint manager within three working days from the date of receipt of the complaint from the whistleblower in order to screen the information received from the whistleblower or complainant, divided into three groups as follows:

Procedure	Respondents (3 groups)		
	Employee	Executive	Directors and/or the Company
1. Complaints are handled by the Board of Directors or Audit Committee by appointing an investigative team.	Within seven working days from the date of receiving the complaint to conduct a fact-finding investigation.		
2. Preparation of complaint control register.	Immediately from the date of receiving the complaint.		
3. Summarize the results of the investigation and propose punishment to the complaint manager.	Within 30 days from the date of appointment of the investigation team. In case of necessity that cannot be completed within the specified period, the investigative team can propose to the complaint manager for approval to extend the investigation period, not more than seven days at a time.		

Notes :

1. If the investigation team does not complete the task within the specified period or does not request to extend the period specified above, it is considered that the investigative team does not comply with this regulation and must proceed with a letter explaining the reasons for not being able to proceed to the complaint manager.
2. If the accused or complained is holding the position of "director, executive, employee, or person named on the board of directors" or sub-committees, they have no right to attend meetings, discuss or investigate facts, including having no right to access information about clues or complaints until the process is completed.

Procedures for Whistleblowing and Complaints

Process Flow	Period	Job Description	Responsible person	Document
	Within 3 working days from the date of acceptance	The Audit Committee receives complaints and conducts a preliminary investigation related to conflicts of ethics and business ethics, corruption, and conflicts of interest.	Secretary	FM-ATC-09 FM-ATC-10
	Within 2 business days from the date of acceptance	Report preliminary information to the Chairman of the Board of Directors/Chairman of the BOD.	Secretary	
	Within 7 working days from the date of receiving the complaint	<ul style="list-style-type: none"> - Define duties and responsibilities - Review information and order - Prepare the control register 	Chairman of the BOD/Chairman of the AC.	Record the control register and summarize the statistics.
	Within 30 days from the date of appointment of the investigation team.	- Check the factual information.	Investigation team	FM-ATC-11
	If it exceeds the specified period, expand the investigation not more than 7 days at a time.	<ul style="list-style-type: none"> - Consider facts and evidence received from witnesses - Notify the complainant and related persons, including status reports on progress. 	Investigation team	FM-ATC-11
				
		- Report progress to the Board of Directors and the Audit Committee.	Investigation team	FM-ATC-11
		- Determine penalties according to the company's rules, regulations, or the law.	Investigation Team/Human Resources Department	FM-ATC-11
		- Gather data statistics and clues, including keeping documents confidential.	-Investigation team -Secretary	Record the control register and summarize the statistics.

False Whistleblowing

The company will consider disciplinary action according to its rules and regulations or take legal action against whistleblowers or complainants who provide false information, as appropriate.

Related Documents

1. Anti-Corruption Policy and Guidelines
2. Conflict of Interest Policy
3. Business Ethics and Conduct Manual

Forms Used for Reporting Clues or Complaints

1. FM-ATC-09 Whistleblowing and Complaint Form
2. FM-ATC-10 Record of Clues or Complaints and Check the Preliminary Facts
3. FM-ATC-11 Investigation Report
4. Controlling Records and Summary of Statistics for Whistleblowing or Complaints

Review of Whistleblowing or Complaints Policy

The company will review, examine, and improve its whistleblowing or complaints policy and propose changes to the Audit Committee meeting at least once a year.