Whistleblowing and Complaints Policy

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Introduction

JMT Network Services Public Company Limited and its affiliated companies (collectively referred to as the "Company") are committed to conducting business in accordance with good corporate governance principles, with responsibility, transparency and accountability, and have consistently attached importance to the rights and voices of stakeholders both within and outside the organization. To strengthen a transparent corporate culture and prevent conduct that may cause adverse impacts, such as disciplinary misconduct, breaches of the Business Code of Conduct or fraud, the Company has established this Whistleblowing and Complaints Policy. The Policy covers misconduct by directors, executives, employees and personnel working within the business group, enabling stakeholders to safely report information or incidents that may constitute violations of the law, Company regulations or corporate governance principles. Whistleblowers may report anonymously. The Company will maintain strict confidentiality and provide protection for whistleblowers and information providers in connection with their reports or participation in the investigation process. The Policy also promotes corporate sustainability by helping to prevent and investigate conduct that may affect the Company in social, environmental and corporate governance matters. A safe and reliable whistleblowing system provides an important foundation for the Company's stable and sustainable long-term growth.

Objectives

1. To ensure that the Company's business operations and the work of directors, executives and employees at all levels are conducted properly, transparently, fairly and accountably, within the framework of the law, the Business Code of Conduct, good corporate governance principles and relevant rules and regulations.
2. To provide safe and accessible channels for employees and external parties to report misconduct, fraud or inappropriate conduct occurring within the Company.
3. To protect individuals who report concerns or provide information to the Company from retaliation, harassment or discrimination, both during the investigation and after the process has been completed, so that they can provide information without concern about adverse consequences.
4. To establish clear, fair and verifiable guidelines for receiving, reviewing and investigating complaints or reports.
5. To prevent and reduce the likelihood of misconduct or fraud, and to effectively manage risks that may affect the organization.

Scope

This Policy applies to JMT Network Services Public Company Limited and all its subsidiaries. It covers guidelines, practices and processes relating to whistleblowing and complaints from both personnel within the organization and external stakeholders, within the framework set out in this Policy.

Definitions

"Company" means JMT Network Services Public Company Limited and its affiliated companies.

"Employee" means Employees at all levels of JMT Network Services Public Company Limited and its affiliated companies.

"Whistleblower" means An employee, supplier, business partner or external party who submits a report through the channels designated by the Company.

"Breach of the Code of Conduct" means Failure to comply with the guidelines, standards and business ethics established by the Company, which directors, executives and employees at all levels are expected to strictly uphold in their work.

"Misconduct" means Any act or omission by directors, executives or employees at any level that constitutes a breach of the Business Code of Conduct, work rules, regulations or policies of the Company, or a violation of laws relating to the Company's business, and/or affects the credibility, reputation, assets or rights of the Company and its stakeholders.

"Fraud" means Any act or conduct involving fraudulent intent for the purpose of obtaining money or other benefits, or an unlawful act that causes damage to the Company.

Whistleblowing and Receipt of Complaints

The Company provides channels for employees and stakeholder groups to report concerns or submit complaints when they witness or become aware of matters that may constitute breaches of the Business Code of Conduct or corporate governance principles, fraud and corruption, or other related matters. These channels are safe and protect the confidentiality of whistleblowers. The Misconduct Investigation Committee is directly responsible for handling such matters.

Guidelines

1. The Company promotes an open and transparent corporate culture by allowing employees and stakeholders to report, in good faith, concerns or inappropriate conduct that may violate the Code of Conduct, the law or Company requirements.
2. Safe, confidential and convenient whistleblowing channels are provided so that concerns can be reported without fear of retaliation or adverse consequences.
3. Whistleblowers and complainants will be protected from all forms of harassment, intimidation, discrimination or punishment, whether direct or indirect.
4. Reports will be reviewed and investigated fairly, objectively and carefully, with those accused given an appropriate opportunity to provide explanations.
5. The Company will maintain strict confidentiality regarding whistleblowers, unless consent is given or disclosure is required by law.
6. Intentionally providing false information constitutes a breach of the Code of Conduct and may result in disciplinary action under Company regulations.

Scope and Conditions for Whistleblowing and Receipt of Complaints

1. The whistleblower or complainant has encountered misconduct or a situation that may constitute misconduct as defined by the Company. A report must contain sufficient information to establish a connection to the facts, or supporting evidence that enables further investigation.
2. A report must contain verifiable information and must not rely solely on personal opinions or feelings without evidence or reasonable grounds, so that the review process is efficient, transparent and reliable.
3. The whistleblower or complainant is a person who has been treated unfairly or affected directly or indirectly by misconduct, including being threatened or intimidated into participating in misconduct with any individual or group connected with the Company.

Whistleblowing and Complaint Channels

1. Email: whistleblowing@jmtnetwork.co.th

2. Website: https://www.jmtnetwork.co.th/th/investor-relations/corporate-governance/whistleblowing-form

3. Post: Addressed to the "Audit Committee", 187, 189 Jaymart Building, Ramkhamhaeng Road, Rat Phatthana, Saphan Sung, Bangkok 10240.

4. Suggestion Box: Jaymart Building A, Floor L, 187, 189 Ramkhamhaeng Road, Rat Phatthana, Saphan Sung, Bangkok 10240.

Protection of Whistleblowers and Complainants

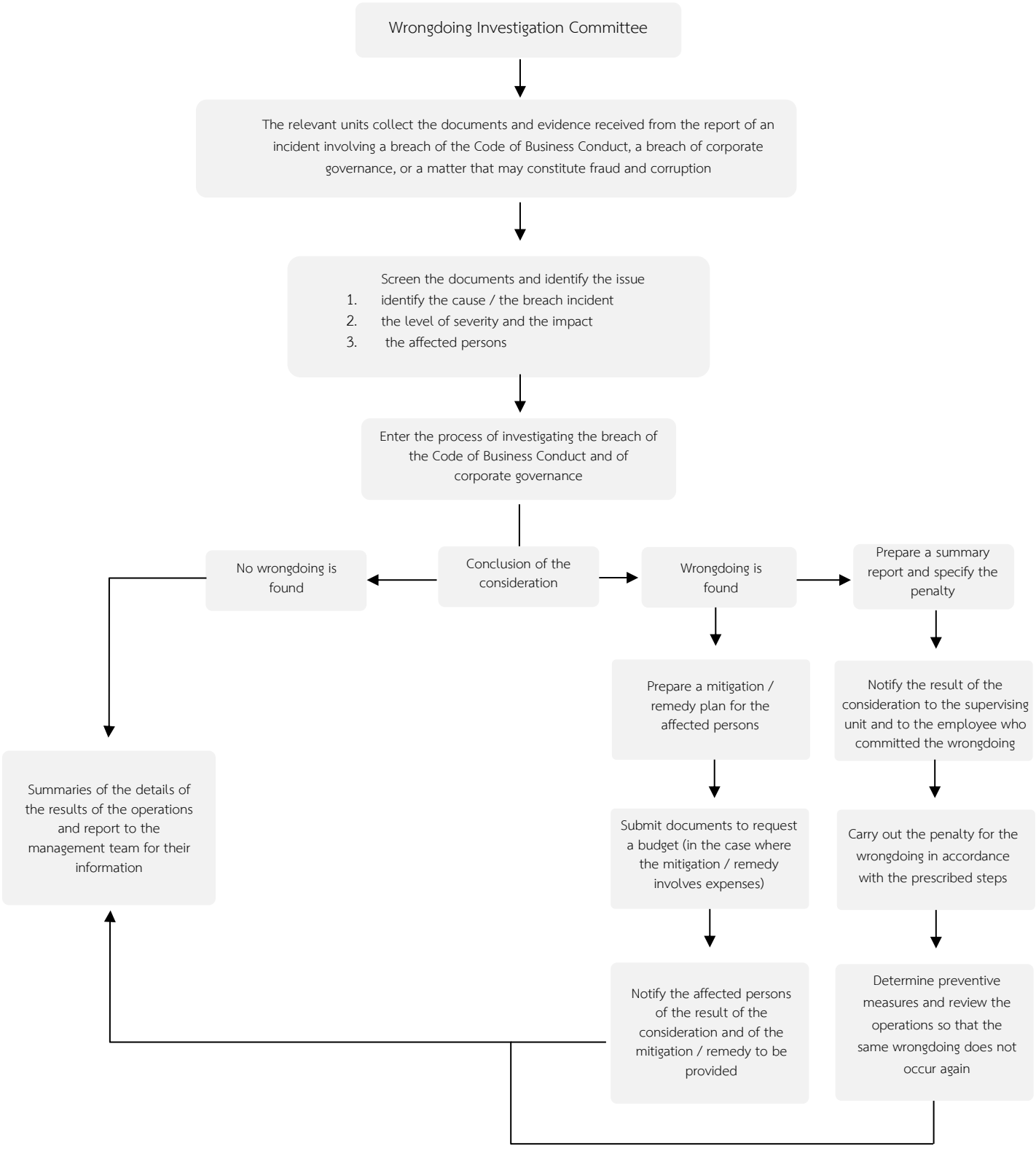
1. To protect the rights of whistleblowers and complainants, the Company will not disclose the names of whistleblowers or related persons, details of reports or related facts. Such information will be kept confidential, with safety as a primary consideration. Access is restricted to those responsible for investigating the reports, unless disclosure is required by law.
2. The Company will review incidents and conduct fact-finding procedures with careful and comprehensive consideration of sensitive issues to avoid adverse impacts on whistleblowers. The Company will treat both whistleblowers and persons subject to complaints fairly and without discrimination.
3. The Company will protect whistleblowers and related persons from harassment arising from reporting concerns or properly performing their duties in this regard.
4. Whistleblowers, complainants and those who cooperate in fact-finding may request appropriate protective measures from the Company if they believe that their safety may be at risk or that they may suffer harm or damage.

Review of Misconduct

1. The Company will promptly investigate upon receiving a report or identifying conduct that may constitute a breach of the Business Code of Conduct, misconduct or non-compliance with corporate governance principles. The Investigation Committee or relevant authorized persons will be assigned responsibility for fact-finding.
2. Those involved must provide complete information and supporting evidence to ensure a comprehensive, transparent and fair investigation based on the witnesses, evidence and explanations received.

3. If the investigation finds no misconduct, the Company will close the matter without further action. If misconduct is established, disciplinary proceedings will be undertaken according to the seriousness of the conduct.
4. Every stage of the investigation will adhere to the principles of transparency and fairness, and the accused will be given an opportunity to provide explanations before a final decision is made. If the findings reveal management deficiencies or gaps, the Company will use this information to improve its management systems, risk management and preventive measures to avoid similar incidents in the future.

Misconduct Review Process



Disciplinary Measures

The Company has guidelines for disciplinary action against individuals who commit misconduct, breach or fail to comply with the Code of Conduct, regulations, policies or established corporate governance principles. Disciplinary measures will be considered in accordance with the Company's work rules, taking into account appropriateness, fairness, the seriousness of the conduct, its consequences and the intent of the person responsible.

Disciplinary measures include verbal warnings, written warnings, suspension without pay and termination of employment. The Company will select measures appropriate to the conduct and circumstances, without necessarily applying them in sequential order.

In cases of serious misconduct, the Company has the right to terminate employment without prior notice or severance pay. Examples include giving or receiving bribes, fraud and corruption, unauthorized disclosure of the Company's confidential information or intellectual property, concealment of material information from supervisors, or any conduct that seriously damages the Company's reputation and credibility. If the conduct constitutes an offence under the law, the Company will pursue legal proceedings in addition to internal disciplinary measures.

Monitoring and Review of Issues

The Company requires management to regularly monitor complaints received through the various complaint channels to ensure that, when a complaint arises, the misconduct review process is carried out promptly, correctly and fairly for all parties, particularly the steps for mitigating impacts and providing remediation to persons affected by the misconduct. Management is also required to prepare for the review, improvement and development of processes to reduce misconduct and prevent recurrence in a manner appropriate to the organization's context.

This also includes promoting knowledge of responsibilities in accordance with good practices under the Business Code of Conduct, corporate governance principles and anti-fraud and anti-corruption measures, which directors, executives and employees are expected to strictly observe.

Policy Review and Revision Schedule

The department responsible for this Whistleblowing and Complaints Policy is required to review and update the details of each process to reflect current circumstances at least once a year, and submit the Policy to the Board of Directors for consideration and approval in accordance with the established process.

This Policy shall take effect from 14 May 2025 onwards.



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Approver of the Whistleblowing and Complaints Policy

Mr. Adisak Sukumvitaya

Chairman of the Board

Revision History

Revision	Responsible Department	Review Date	Effective Date	Details of Revision
REV00	Investor Relations	Board of Directors Meeting No. 5/2025, held on 14 May 2025	14 May 2025	Initial issuance of the Policy