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Whistleblowing Policy

Nova Organic Public Company Limited commits to conduct business with integrity and social responsibility. The Company has established a Whistleblowing Policy to serve as a channel for directors, executives, employees, customers, third parties to submit complaints or report evidence in case of fraud, illegal action, breaching the rules or deviating from the Company's policy and violating the Code of Business Conduct and Ethics to improve or proceed the business for accuracy, appropriateness, transparency, and integrity. The information of the whistleblower and the matter reported will be kept secret to prevent infringement of rights.

Practice guidelines

1. Employees, customers or third parties are able to submit complaints and wrongdoings actions along with reliable information specifying details in written to request for investigation by showing or not showing yourself and sent to the Chairman of the Audit Committee in 2 channels as follows:
 - 1) Postal channels
Secretary of the Audit Committee
Address: 174,176 Rama 2 rd., Soi 60, Samae Dam Subdistrict, Bang Khun Thian District, Bangkok 10150
 - 2) Electronic mail (E-Mail) which is supervised by the Secretary of the Audit Committee
info@nova-organic.com
2. The Company will proceed with fairness to whistleblowers. If the whistleblower is an employee of the Company, there will be no alteration of responsibilities or workplace, suspension, intimidation, harassment, termination of employment or any other act that is unfair to the whistleblower. If the whistleblower is a customer or a third party, the Company will consider and investigate with transparency by treating all stakeholders equally and equitably in order to assure whistleblower of their trust and confidence in a trustworthy audit process.

3. In case the reporting with faithlessness and/or the case with intention to cause damage to the Company or incorrectly reported, if they are employees, they will be subjected to disciplinary action in accordance with the Company regulations. If they are a customer or a third party which caused the Company to be damaged, the Company will consider prosecution according to the law.
4. The Company will keep the information related to the report confidential, such as the name of the whistleblower or the content of the reported matter. Unless the additional information is requested or requested by law, the Company will notify the whistleblower before disclosing the information.
5. The person receiving the complaints will consider the matter whether it is necessary to investigate or not by taking into account the principles of fairness and honesty. If the investigation is necessary, the whistleblower will be informed. If the whistleblower does not show their identity, the Company will not be able to report the investigation back to the whistleblower.
6. If an investigation is necessary, the whistleblower will report such evidence to the Audit Committee for further consideration which the Audit Committee may appoint an investigative working team where it is deemed appropriate and provided that the accused must not be part of the investigative working team. In the event that the accused is one of the Audit Committee members, the whistleblower will report to the Chief Executive Officer instead.
7. The working team will inform the investigation results to the whistleblower. If it is an anonymous notification, it will not be possible to report the results of the investigation to the whistleblower.
8. If the result of the investigation is confirmed to be true, the Company will establish measures to prevent and correct it in a timely manner and, if necessary, the Company will consider to punish the person concerned or make a report to the relevant sector for acknowledgement.
9. All information received from the whistleblower and other evidence/observations/investigation results will be kept as a confidential document by the Company Secretary.

Measures to protect the complainant or the whistleblower

Employees, customers or third parties who report complaints or whistleblowing in good faith will receive suitable protection as follows:

1. The Company will collect information and identity of the complainant, whistleblower, and the accused person confidential.
2. If the Company is necessary to disclose information, the Company will disclose only the necessary information by taking into account the safety and devastate the complainant and whistleblower.

Effective date

This Whistleblowing Policy has been approved by the Board of Directors Meeting No. 1/2021, effective from 12 July 2021 onwards.

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(Ms. Haruethai Sirisinvi boon)
Company Secretary

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(Mr. Prakit Tangtisanon)
Chairman of the Board