



Whistleblowing Policy

Sea Oil Public Company Limited and Subsidiaries

(Approved by the Board of Directors' Meeting No. 6/2025 to be effective on 1 December 2025.)

 Sea Oil Public Company Limited	Whistleblowing Policy	Document no: PY - SEA - 031
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		Effective Date: 1 December 2025
		Approver: The Board of Directors No. 6/2025

Sea Oil Public Company Limited and its subsidiaries (the “Company”) are committed to conducting business in accordance with ethical principles and good corporate governance, with transparent management and fair and equitable treatment of all stakeholders. The Board of Directors has therefore established the Whistleblowing and Complaint Policy (the “Policy”) to provide employees and all groups of internal and external stakeholders with opportunities to contact the Company, submit complaints regarding conduct that is inconsistent with applicable standards, or report suspected violations of laws, the Code of Conduct, infringement of rights, fraud, or corruption. The Company has established whistleblowing and complaint channels, procedures for handling such reports, and measures to protect whistleblowers or complainants and maintain their confidentiality in a fair and effective manner, as follows:

1. Scope of Application:

This Policy is established to encourage the Company’s stakeholders to submit complaints, report concerns, or disclose information indicating that they have been affected by the Company’s business operations, violations of laws, policies, rules, regulations, or the Code of Conduct, human rights violations, violations of personal data rights, unfair treatment in the course of work, or misconduct that may indicate fraud or corruption, including any impact resulting from the refusal to engage in fraud or corruption, whether financial or non-financial.

2. Whistleblowing and Complaint Channels

The Company provides the following channels for whistleblowing or filing complaints:

- **By Post**

Addressed to: Chairman of the Board of director or Chairman of the Audit Committee
Sea Oil Public Company Limited
88 Soi Bangna-Trad 30, Debaratna Road, Bang Na Tai, Bang Na, Bangkok 10260

- **By email**

Chairman of the Audit Committee: ruth@banomyong.com
Chief Executive Officer and Managing Director: neeracha@seaoilthailand.com
Compliance & Company Secretary Office: Compliance@seaoilthailand.com

- **Via the Company’s website**

www.seaoilthailand.com (Whistleblowing System)

The complainant may select the recipient of the complaint as follows:

Chairman of the Audit Committee: ruth@banomyong.com
Chief Executive Officer and Managing Director: neeracha@seaoilthailand.com
Governance and Company Secretary Office: compliance@seaoilthailand.com

In addition to the whistleblowing and complaint channels specified above, employees may raise inquiries or submit complaints if they observe any conduct suspected of violating or failing to comply with the Code of Conduct through the following channels:

- Chief Executive Officer and President
- Compliance and Company Secretary Office Manager
- Any level of supervisor whom the employee trusts

3. Process for Whistleblowing Reports and Complaints, and Disciplinary Measures

(1) Receipt of Reports and Collection of Relevant Facts

Upon receipt of a whistleblowing report or complaint, the designated recipient, through the prescribed channels, shall acknowledge receipt to the whistleblower (where the whistleblower has consented to disclose their identity), collect the relevant facts, and forward the matter to the Audit Committee within 7 business days.

The Audit Committee shall assign the Internal Auditor or appoint a Fact-Finding Committee to screen and investigate the facts and periodically inform the whistleblower or complainant of the progress and results of the investigation.

(2) Investigation of Facts

The assigned person or the Fact-Finding Committee shall conduct the investigation of facts, process and screen the information received in order to consider the impact, as well as the appropriate procedures and methods for handling each matter. The investigation results shall be reported to the Audit Committee for consideration and comments within 90 business days. If an extension of time is necessary, approval must be obtained solely from the Chairman of the Audit Committee. All persons responsible for investigating a complaint must have no conflict of interest in relation to such complaint.

If the fact-finding investigation determines that the available information or evidence provides reasonable grounds to believe that the accused person has committed fraud or corruption, the Company shall give the accused person the right to be informed of the allegations and to defend himself or herself by providing additional information or evidence demonstrating that he or she was not involved in the alleged fraudulent or corrupt conduct.

If the accused person is found to have committed the misconduct, the Company has established disciplinary measures for directors, executives, and employees who fail to comply with the Anti-Corruption Policy and Measures. Such measures include removal from the position of director, disciplinary action against executives and employees in accordance with the Company's prescribed regulations, as well as legal action where the fraudulent or corrupt act constitutes a violation of applicable laws, rules, or regulations. In this regard, with

respect to disciplinary action under the Company's regulations, the decision of the Audit Committee shall be final.

(3) Conclusion and Reporting

The assigned investigator, Internal Audit function, or the appointed investigation committee is responsible for preparing a summary report of all whistleblowing reports received by the Company and its subsidiaries. In cases where the matter has been considered and/or is under investigation, including the review of evidence and facts, the findings shall be reported to Audit and Risk Management Committee on a case-by-case basis. The Audit and Risk Management Committee shall subsequently report the outcomes to the Board of Directors for acknowledgment.

4. Whistleblower and Complainant Protection and Confidentiality Measures

- 4.1.** In order to protect the rights of complainants and information providers who act in good faith, the Company shall keep confidential the names, addresses, or any other information that may identify the complainants or information providers. Information relating to complainants and information providers shall be kept confidential, and access shall be restricted only to persons responsible for investigating the complaint, taking into consideration the safety of and any potential harm to the whistleblower or complainant, the source of information, or any related persons, except where disclosure is necessary for procedures in accordance with the Company's regulations or as required by law.
- 4.2.** In the event of a complaint concerning a violation of the Code of Conduct by executives or senior executives, the Audit Committee shall be responsible for protecting whistleblowers or complainants, witnesses, and persons providing information in the fact-finding investigation from suffering any hardship, danger, or unfair treatment arising from whistleblowing, filing a complaint, acting as a witness, or providing information.
- 4.3.** The Company has no policy to demote, penalize, or impose any adverse consequences on employees who refuse to engage in corruption, even where such refusal may result in the Company losing a business opportunity. The Company shall ensure that this policy is communicated thoroughly to all employees.
- 4.4.** Persons responsible for performing duties related to complaints shall keep confidential all whistleblowing or complaint information, documents, and evidence relating to complainants and information providers. Such information shall not be disclosed to any person who has no relevant responsibility, except where disclosure is required by law.
- 4.5.** Any person who suffers hardship or damage shall receive appropriate and fair remedial measures.

Governance and Monitoring for Compliance with the policy

The Company requires all directors, executives, and employees to be responsible for acknowledging, understanding, and strictly supporting compliance with the Code of Conduct and this Policy. The Company shall also

review this Policy annually to ensure its appropriateness in light of the business environment and its consistency with applicable laws.

This announcement is made for acknowledgment and strict compliance by all concerned.

Mr. Apisit Rujikeatkamjorn

Chairman

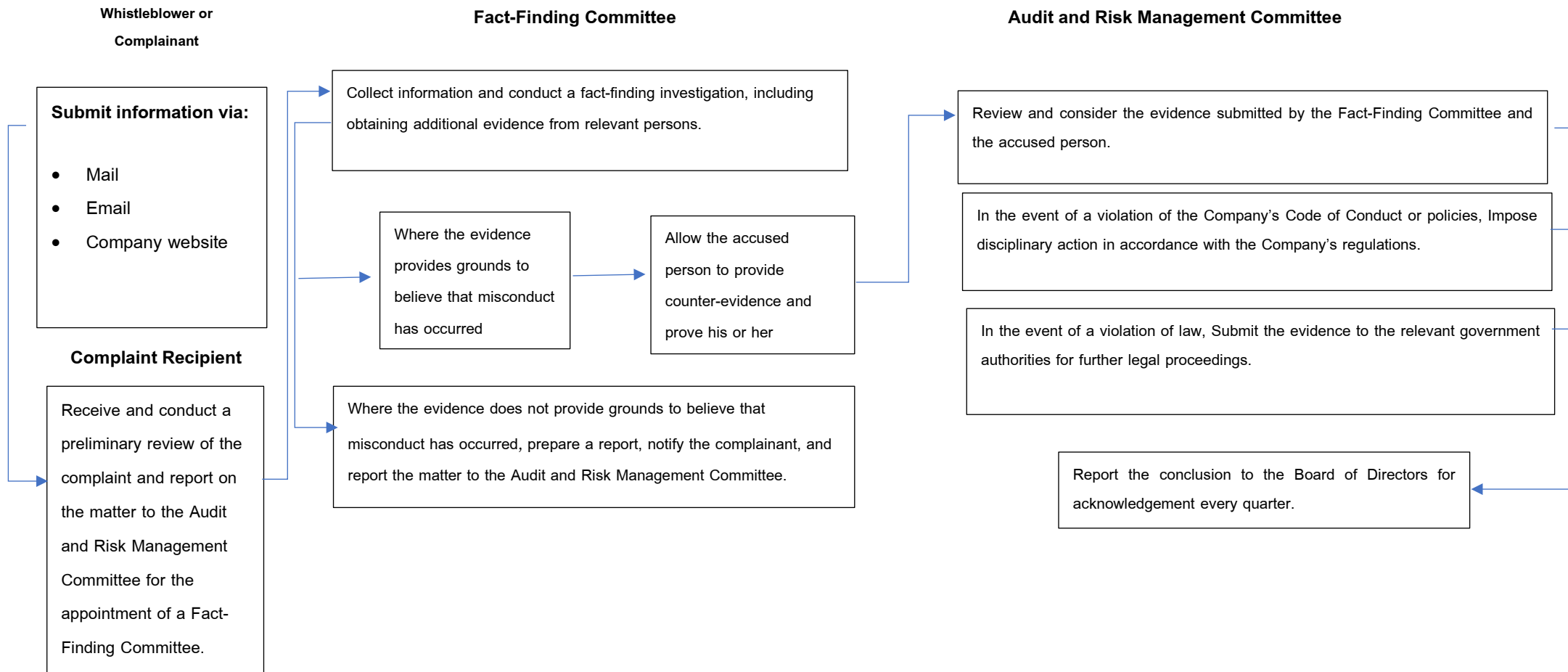
Sea Oil Public Company Limited

Ms. Neeracha Panboonhom

President and Chief Executive Officer

Sea Oil Public Company Limited

Procedures upon Receipt of Whistleblowing Reports or Complaints



Whistleblowing and Complaint Handling Process

