

# Whistleblower Policy

Corporate Governance



### Whistleblower Policy \_\_\_\_\_



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#### 1. SAMI-AEC WHISTLEBLOWER POLICY

#### 1.1. Introduction

It is the Company's policy to emphasis its code of conduct to ensure an honest and integrity-based practice of duties and to open a communication channel with the right audience in case of violation. This policy is intended to encourage and enable any whistleblower to raise concerns to the Company.

The Company will not retaliate against a whistleblower, this includes but not limited to, protection from retaliation act such as termination of employment or contract, compensation decreases, poor work assignments, threat of any harm or others provided that the concern raised was in good faith.

A whistleblower that makes a report not done in good faith is subject to disciplinary action including termination of employment or contract or other legal means to protect the reputation of the Company.

This policy covers situations where concerns arise about risk related to malpractices in financial accounting, crime, fraud, bribery or corruption.

#### 2. APPROACH TO MANAGE WHISTLEBLOWERS REPORTS

#### 2.1. Reporting

The Company adopts an open-door policy and encourages everyone to report any concern stated in the scope of this policy directly via the hotline 011-2201350 extension 4444, or email GNE@aecl.com.

#### 2.2. Handling Reported Violations

Sender will be notified of the receipt of the reported violation. The details of the case shall be registered and kept in a log maintained by Corporate Governance section. Head of CG&IA is responsible for investigating the reported cases, determining the correctness of allegation, recommending the appropriate corrective actions, and resolving all reported complaints and allegations concerning violations stated in the scope of this policy. Head of CG&IA shall advise the CEO at his discretion about each case, and shall report any occurred cases to the BoD. The whistleblower will be informed of the result of the investigation or actions taken if not received from anonymous sources.

#### 2.3. Confidentiality

Violations shall be treated in a confidential manner. The reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Concerns received from anonymous sources are also accepted. However, it must be provided with supporting evidences. Depending on the nature of the matter raised, the Company may be required by law to disclose some or all of the information to a third party. The whistleblower will be informed if such disclosures are made.



## Thank You