




บริษัท แอปพลาย ดีบี จำกัด (มหาชน)

APPLIED DB PUBLIC COMPANY LIMITED

Whistle Blowing Policy

	<p>Document type : Policy Subject : Whistle Blowing Policy</p>	<p>Document No. IA₁-ADB-10</p>	<p>Effective Date 1 June 2026</p>	<p>Edited 05</p>	<p>Page 1</p>
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Whistle Blowing Policy

Applied DB Public Company Limited and its subsidiaries, collectively referred to in this document as the “Company”), place importance on good corporate governance, transparency, auditability, and ethical business practices in accordance with the principles of good governance. The Company has therefore established the Whistle Blowing Policy, which aims to provide a channel for all stakeholders to file complaints or provide information in the event that they encounter or learn of any fraud or other wrongdoing that directly affects the Company and its personnel, the interests, or feelings of individuals, such as any illegal acts, acts that violate the Company’s policies, or acts that violate business ethics, in order to enhance cooperation, improve and amend for correctness, appropriateness, and transparency, which will benefit the Company and all parties involved.

1. Objective

- 1.1 To support the directors, executives and all employees of the Company, as well as all stakeholders, to file complaints and report misconduct and corruption related to the Company.
- 1.2 To establish a safe and confidential channel for filing complaints and reporting misconduct and corruption to enable any person to provide information on their concerns with confidence.
- 1.3 To protect employees who have filed complaints and reported misconduct and corruption, including providing any cooperation or assistance to the Company, from being threatened, intimidated, having their job positions, work characteristics or workplace changed, being suspended, fired or being treated in any other manner that is unfair.
- 1.4 To prevent misconduct and corruption that may occur in the Company and to help detect and reduce damage from misconduct or corruption.
- 1.5 To promote the Company's image and good ethics.

2. Scope

This Policy shall apply to all directors, executives and employees of the Company and shall cover any known or suspected misconduct and corruption involving executives, employees, suppliers/service providers, creditors, customers, business partners, shareholders, directors and other non-stakeholders who have a business relationship with the Company.


3. Duties and Responsibilities of Persons Involved

3.1 The Board of Directors

- 1) Establish a policy for reporting wrongdoing and/or other related policies.
- 2) Supervise business operations to comply with relevant laws, regulations, rules, policies and practices, and promote effective implementation of the policy.

3.2 Executive

- 1) Provide a process and channels for receiving complaints or reporting misconduct, including appropriate and clear measures to protect complainants or whistleblowers.
- 2) Monitor, manage and promote compliance with the Company's policies and regulations.
- 3) Create an appropriate environment to build confidence in complainants in reporting misconduct, complaints and corruption.
- 4) Report the results of operations regarding receiving complaints or reporting to the Board of Directors.

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3.3 Responsible Agencies or Persons


- 1) Establish procedures and processes in accordance with the Company's policies and regulations.
- 2) Define the scope of whistle blowing or complaints.
- 3) Raise awareness through communication and training, including providing advice to personnel.
- 4) Manage operations in accordance with the Company's regulations and whistle blowing or complaints measures.
- 5) Report the investigation results to whistleblowers, complainants, accused persons, and relevant executives.
- 6) Collect and prepare performance reports for executives.
- 7) Review whistle blowing or complaint operations to ensure they comply with the specified process.
- 8) Evaluate the efficiency of the whistle blowing or complaint management process, and determine guidelines for improvement.

3.4 Employee

- 1) Acknowledge and comply with this Policy.
- 2) Immediately notify the supervisor in the line of work and/or through the channels specified in this policy. If you see or have reasonable grounds to believe that an offense or corruption has occurred.
- 3) Cooperate and assist the relevant agencies of the Company in charge of investigating complaints and clues of wrongdoing and corruption.

4. Scope of whistle blowing and complaints

- 4.1 The implementation of this policy shall be in accordance with the practices set by the Company, including other related regulations and guidelines.
- 4.2 The Company will consider accepting complaints in the following matters:
 - 1) Corruption and/or fraudulent acts.
 - 2) Abuse of power
 - 3) Use of the Company's money, property and/or facilities without authorization.
 - 4) Involvement with conflicts of interest and/or positions, business opportunities.
 - 5) Failure to comply with the Company's rules, regulations and/or business ethics.
 - 6) Involvement with politics and dangerous and/or illegal acts
 - 7) Neglect and/or corruption in performing duties
 - 8) Unauthorized disclosure of the Company's information
 - 9) Acts that risk the safety and security of the Company's property, facilities and/or employees
 - 10) Acts that do not meet professional standards
 - 11) Concealment of the above information
 - 12) Acts that are threatening, intimidating
- 4.3 The Company will not accept complaints. as follows
 - 1) Matters unrelated to the Company or the business that the Company operates.
 - 2) Matters that are false information, without reasonable cause, or slanderous or do not specify evidence, facts or circumstances that are clear enough to enable further investigation.
 - 3) The matter has been completely diagnosed by the Company and there is no new evidence that is additional material.

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5. Official whistle blowing and complaints

When they see an offense or behavior that invites the age that there may be a wrongdoing by the directors. Executives, employees and operators of the Company and its subsidiaries shall report whistle blowing and complaints through channels. as follows

■ Internal channels (for the Company's personnel)

- Superiors who are trusted at all levels.
- Chief Executive Officer (CEO)
- Managing Director (MD)
- Any director of the Company
- Internal Control Unit.
- Human Resources & Development
- Report clues and complaints in writing via email at adb_cg@adb.co.th. Emails will be sent to the Chief Executive Officer, Acting Director of Human Resources and Development, Company Secretary and Internal Control Unit.
- Suggestion boxes (red boxes) installed at the security booths of every branch of the company
- Send letters to the above persons to
Applied DB Public Company Limited
No.252 Moo 4, Sukhumvit Road, Prakasa, Mueang Samut Prakan, Samut Prakan, 10280

■ Channels for External person

- 1) Telephone: Contact the Company Secretary and Internal Control Unit at 02-709 4040 ext. 1097-1099
- 2) E-mail
 - Chief Executive Officer, Managing Director, Vice President of Human Resources and Development, Company Secretary and Internal Control Unit adb_cg@adb.co.th
 - Internal Control Unit adb-ia@adb.co.th
 - Company Secretary Office adb-cs@adb.co.th
 - Investor Relations Unit adb-ir@adb.co.th
- 3) Send the letter to the Audit Committee or the person you wish to send it to:
Applied DB Public Company Limited
No.252 Moo 4, Sukhumvit Road, Prakasa, Mueang Samut Prakan, Samut Prakan, 10280


6. Guidelines for reporting clues or complaints

6.1 In the event that the whistleblower reveals his/her identity

- State his/her name and contact information
- State the name of the suspect (if known)
- State the date, time, and location of the incident (if known)
- State the clues and behaviors found or that there is reason to believe are misconduct that falls under the category of behaviors under Section 4.2 to the recipient
- Cooperate in providing additional information (if requested)

6.2 In the event that the informant does not reveal his/her identity

- Report the name of the suspect (if known)

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- Inform the date, time, and location of the incident (if known)
- Report any clues and behavior found or there is reason to believe that there is misconduct that falls under the category of behavior under Section 4.2 to the recipient.

7. Process for handling when receiving information or complaints

7.1 Collect facts

When receiving a tip or complaint, the Company will assign the Internal Control Unit or other assigned unit to collect relevant facts to consider and filter the information received from the tip or complainant. If the investigation finds that there is truth, the Internal Control Unit or other assigned unit will present it to the Audit Committee and the Board of Directors for consideration and acknowledgement and order or determine guidelines for action, as well as appoint a fact-finding committee to proceed with the consideration of the relevant parts.

7.2 Data processing and filtering

The internal control unit or other assigned unit processes and screens information to consider appropriate procedures and methods for handling each matter. It may do so by itself or assign an investigation committee to process and screen information. The investigation committee will be appointed by the CEO or the executive committee or the board of directors, depending on the situation and appropriateness.

7.3 Fact-finding investigation

- If after investigation, it is found that the accused is truly guilty, if he is a company employee, he will be subject to disciplinary punishment according to the company's regulations. However, if he is an outsider who has acted in such a way, causing damage to the company, the company will consider taking legal action against that person.
- If after reviewing the facts, it is found that there is no information or lack of evidence that provides a reasonable basis to believe that the accused has actually committed corruption, the Company will inform the accused of the charges and give the accused the right to prove themselves by finding additional information or evidence that shows that they were not involved in the alleged acts.


7.4 Reporting of results

The whistleblower and complaint receiver has a duty to report the results to the whistleblower and receive the complaint if the whistleblower or complainant reveals himself/herself. In the case of a material issue that has an impact on the damage to the company, the results must be reported to the company's highest executives or the audit committee or the board of directors, along with finding ways to prevent or resolve such cases from happening again.

8. Measures to protect whistleblowers or complainants

Whistleblowers, complainants or those who cooperate in the investigation will receive appropriate and fair protection from the Company as follows:

- 8.1 The Company shall keep the information and identity of the whistleblower, the complainant, the accused, including those who cooperate in the investigation as confidential. The relevant persons who are aware of the matter or information related to the complaint must keep the information confidential and not disclose it to other persons, except where it is necessary to disclose it as required by law.

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8.2 The Company shall disclose information only as necessary, taking into account the safety and damage of the reporter, the source of the information or the related persons.

8.3 Whistleblowers, complainants and those who cooperate in fact-finding investigations will have their rights protected, whether they are company personnel or external persons, to ensure their safety and avoid harassment.

8.4 The Company shall not act in any way that is unfair to the whistleblower, the complainant or the person who cooperates in the fact-finding investigation, such as transferring, changing positions, changing the nature of work, workplace, suspending work, threatening, disturbing work, terminating employment or taking any other action that is considered improper and unfair.

9. Reporting false information or complaints

If the investigation finds that the report or complaint, statement or information provided is not based on any truth, and if it is proven that the reporter or complainant acted with dishonest intention, was false and intended to cause damage or did other actions that intentionally caused damage to the Company and/or the complainant, the Company will consider punishing the reporter and complainant as follows:

- 1) In the case that the whistleblower or complainant is a company employee, the investigation will be considered and action will be taken in accordance with the work regulations, which have penalties ranging from verbal or written warnings, suspension, to dismissal, including consideration of taking action according to the civil and criminal legal processes.
- 2) In the event that the whistleblower or complainant is a business partner or business ally, the Company will consider terminating the business partnership and proceed with both civil and criminal legal processes.
- 3) In the event that the whistleblower or complainant is an outsider, the Company will consider taking legal action according to both civil and criminal legal processes.

This Whistleblowing Policy, has been approved by the Board of Directors' Meeting No.2/2026 on May 8, 2026, and be effective from June 1, 2026 onwards.



(Mr.Pawat Wongtangtrakul)

Chairman of the Board