

Indorama Corporation Group Level Policy

Document No: IND-2024-01

Policy & Manual

Version No./Date: V1 – 25th September, 2024

Title: Whistleblower Policy
(Group-level Vigilance Mechanism Framework)

Responsibility: Group Internal Audit

Confidential

Whistleblower Policy

(Group-level Vigilance Mechanism Framework)

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Purpose and Objective

The purpose

The Indorama Corporation Group is committed to an open and transparent culture where it is safe for stakeholders of the Companies to raise genuine and reasonable concerns about potential misconduct and violations of the Indorama Corporation Code of Conduct without fear of retaliation.

The objective

- To provide a vigilance mechanism (also known as a whistleblower policy) for directors, employees, or any other persons / stakeholders (including vendors / customers) to report genuine concerns to the Management.
- To safeguard against the victimization of directors, employees or any other persons / stakeholders (including vendors / customers) who legitimately use the vigilance mechanism.
- To help prevent and eliminate malpractice, and investigate and resolve complaints.

Scope

This Policy applies across all business lines, offices and Companies, and is subject to local laws.

Who can report?

Anyone who has reasonable concerns about potential violations of the Indorama Corporation Code of Conduct, Company policy, or local law is encouraged to speak up. This includes directors, current and former employees, interns, temporary workers, job applicants, suppliers, customers, and other third parties.

Protected Disclosure:

Whistleblowers may make disclosures concerning:

- Any act that violates the Indorama Corporation Code of Conduct and/or any act that adversely affects the business interests of a Company.
- Any act that violates a Company's Articles of Association and/or any rules, regulations, announcements and/or policies of a Company.
- Any act that is illegal under local or international law.

What cannot be reported?

- Routine / administrative matters such as professional development issues or employee compensation, malfunctioning printers, unavailability of stationery, errors in salary processing, etc. should not be reported through the channels set out in this Policy.
- The Policy should not be used as a route to report or raise any false, malicious, or unfounded allegations against any person under a personal agenda. In a nutshell, whistleblowing is an act whereby any person within the scope of this Policy decides to express concerns over which he / she has genuine doubt, and which are raised in good faith.

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How to Report a Concern?

A Whistleblower can report a concern by sending an email to: ethics@indorama.com.

Note: *In case whistle-blower decides to inform about the concern to a trusted supervisor or manager, or someone working in Internal Audit, HR, or Legal, then the person who receives that Protected disclosure should send details of the disclosure to ethics@indorama.com.*

A Whistleblower may choose to be anonymous. However, it may sometimes be difficult or even impossible to thoroughly investigate disclosures that are made anonymously. The Whistleblower is, therefore, strongly encouraged to share his / her identity when making the disclosure. The Whistleblower is expected to give the background and history of his / her concern and the reason why he / she is particularly concerned about the circumstances. Factual data should be provided to the extent possible.

Note: *This Policy serves as our Company’s whistleblowing policy. This Policy broadly applies across the Indorama Corporation Group, but where local laws or regulations are stricter than this Policy, such local laws or regulations shall prevail. For questions about specific laws and regulations related to whistleblowing, please email ethics@indorama.com.*

Safeguards for employees

- The Management will ensure that no adverse action is taken against any employee who makes or raises a Protected Disclosure in good faith, reasonably believing it to be true. The Management will also ensure that any employee who has raised a concern in good faith is not harassed or victimised.
- The Company and Management will not disclose the identity of the Whistleblower nor initiate any unfair or punitive action, which includes changing the Whistleblower’s position, job description or workplace, or suspending, threatening, harassing or laying off the Whistleblower, as a consequence of any Protected Disclosure.
- If any retaliation is brought to the attention of the Management, it will direct an investigation against the persons responsible for such retaliation and ensure that appropriate disciplinary action, up to and including termination of employment, is taken.

Deliberate False Reporting

- If any person raises any Protected Disclosure in good faith that he / she reasonably believes to be true, but which upon investigation proves to be unfounded, no action will be taken against such person. If, however, enquiries/investigations reveal that an employee has made a deliberately false allegation (including with the intention of discrediting a fellow employee), he / she will be investigated to determine whether disciplinary action should be taken against him / her. Such disciplinary action could result in (among other things) termination of employment.
- If any Protected Disclosure reveals that the Whistleblower himself / herself is involved in a malpractice, the Whistleblower will not be exempted from the consequences of any investigation into the Protected Disclosure but the Company will, when deciding on measures to be taken, make note of the Whistleblower’s contribution to the disclosure, including if the disclosure had contributed to mitigating damage to the Company.

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Confidentiality

In addition to the confidentiality obligations generally applicable to employees, all persons (including the Whistleblower and the person(s) disclosed against) involved in the process shall:

- Maintain complete and strict confidentiality / secrecy of the matter and proceedings.
- Not discuss the matter with any person other than as required for any enquiry/investigation into the matter, and only to the extent required by such enquiry/investigation.
- Not keep any papers relating to disclosed matters and/or enquiries/investigations unattended anywhere at any time.
- Protect all electronic mails/files relating to disclosed matters and/or enquiries/investigations with a password.

If anyone is found not complying with the above, he / she shall be held liable for such disciplinary and/or punitive action as is considered fit.

Retention of Documents

All complaints received in writing or documented along with the results of any enquiries/investigation and supporting information will be kept for a period of five years from the final closure of the matter, subject to local laws, by the Group Internal Audit Department.

Definition

#	Terms	Definition
1	Whistleblower	Any person who makes a Protected Disclosure under this Policy.
2	Protected Disclosure	Any communication made in good faith, with the honest belief that there are reasonable grounds for concern, and which discloses information or provides evidence of unethical or improper activity.
3	Investigator	One or more persons authorized or appointed by the Management to assist in the investigation of the Protected Disclosure and submit his / her / their findings to the Management.
4	Companies	The entities within the Indorama Corporation Group, and "Company" means any one of them.
5	Management	The management of the Indorama Corporation Group.