

Policy on Protection for Employees Who Inform on or Disclose of Wrongful Conduct or Non-Compliance
(Whistle Blower Policy)

1. Definitions

Complainant refers to employees of Regional Container Lines Public Co., Ltd. ("RCL") and the subsidiary companies of RCL whether they are full-time employees or employees who have a special hiring contract.

Persons Handling Complaints refers to President

2. Complaints or Information

The corruption or any action that violates the laws, regulations or the Code of Conduct that affects the reputation, image, value, financial status of the Company or conflicts with the business operation policy and is related to high-ranking executives.

3. Channels of complaint or giving information

- 3.1 Send an e-mail to sumate@rclgroup.com
- 3.2 Complain verbally or in writing to President

4. Guideline for Submitting Complaints

- 4.1 The complainant does not need to disclose his/her identity. However, if he/she does disclose his/her identity, this would allow the Company to report him/her the outcome of the investigation concerning the matter of complaint.
- 4.2 If the complainant chooses not to disclose his/her name, he/she must provide sufficient factual details or clear evidence to show that there are grounds to believe that an action occurred in the business practices of the Company. He/she should also inform the Company of his/her contact details so that the Company is able to report him/her the outcome of the investigation concerning the matter of complaint. The complain shall be deemed confidential.

5. Procedure for Investigating Facts

- 5.1 The person handling complaints will be the one to investigate the facts or may authorize a person or group of person to investigate the facts.

5.2 If the investigation reveals that a violation did occur and affects the reputation, value and image of the organization, the person handling complaints shall submit the matter to the Executive Directors and present to the Audit Committee consecutively for consideration of courses of action according to company rules and regulations.

6. Protection of the Complainant or Informant

6.1 The protection will be provided immediately the complaint is submitted.

6.2 The Company will regard the related information as secret and will disclose only so much of it as necessary to ensure the safety of the complainant.

6.3 If the complainant believes that he/she will not be safe or incur harm, he/she may ask the Company to provide appropriate protection, or the Company provides such protection without the complainant's request if it is believed that danger or harm is likely to occur.