## TRIMORO CO., LTD.

211/11-14 NONSI ROAD, CHONG NONSI, YANNAWA, BANGKOK 10120 THAILAND

TEL: (662) 295.30.78, 295.29.43,681.30.15 FAX: (662) 295.30.79Email: office@trimoro.com

## **Complain and Whistle blowing Policy**

Trimoro has a policy and strives to listening to complaints from all stakeholders either within or outside the organization in relation to good corporate governance and business code of conduct, Responsible Jewellery Council: Code of Practices, corporate compliance or fraud reporting.

The Company commits to processing complaints with transparency, honesty and fairness equally including keep personal information confidential and provides measures to protect the sincere complainants and relevant witnesses. This is to ensure that the Company's operations be efficient and conform with the principles of good corporate governance and compliance policy, also to prevent risks and increase the effectiveness of the early warning mechanism for safeguarding against damage that may occur to the Company and stakeholders.

The Company has established the whistleblowing framework as follows:

- 1. Scope of complaints which can be submitted via Whistleblower/Grievance channel covers
  - 1.1. Any fraud, corruption in our company stakeholders
  - 1.2. Money laundering in any cases
  - 1.3. Any bribes make with any stakeholder
  - 1.4. Misconduct or legal breach as well as other matters relating to business ethics.
  - 1.5. Adverse human rights and labour rights in supply chain which are caused, contributed, linked in our jewellery supply chain.
    - 1.5.1. Any discrimination
    - 1.5.2. Any harassment, in humam treatment
    - 1.5.3. Child labour found in the supply chain of company, sub-contractor, suppliers.
    - 1.5.4. Forced and compulsory labour include bond-labour, human trafficking and etc.
    - 1.5.5. Freedom of association and collective bargaining
    - 1.5.6. Working hour and remuneration
    - 1.5.7. Diversity, equity and inclusivity of stakeholders not limited to our workers.
  - 1.6. Potential risks in jewellery supply chain which sourcing from Conflict Affected and High-Risk Areas which has been linked with according to OECD due diligence guidance and company due diligence of responsible minerals.
  - 1.7. Security of products, services and personal in our value chain.
  - 1.8. Health and safety related issues to employees and other related persons.
  - 1.9. Significant impacts to environment
  - 1.10. Un-disclosed product information included synthetic diamond.

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1.11. Kimberley Process Certification Scheme (KPCS), World Diamond Council (WDC) System of Warrantee (SoW)

that may affect all stakeholder, including vulnerable groups, i.e., children, person with disabilities, woman, minorities, migrant people, third-party contracted labor, indigenous people, local communities, LGBTQI+, older persons and pregnant women.

The scope does not include the cases that the management have given resolutions or final decisions nor matter that is being filed in the court or has reached the final judgment of the court.

- 2. Complaints can be submitted via the following channels:
  - (1) Whistleblower channel in the Company website: https://www.trimoro.com/
  - (2) Whistleblower channel in open door policy or directly to Management
  - (3) E-Mail: office@tirmoro.com
  - (4) Mail to the management

To Mr. Vincent

- 211, 11-14 Nonsi Rd, Chong Nonsi, Yan Nawa, Bangkok 10120
- (5) Direct phone call: +66-(0)- 22953078
- 3. Complaints shall be comprised of
  - (1) Name and surname, address, phone or mobile phone number, e-mail address of complainant in order to reporting results, however, the complainant may choose to remain anonymous.
  - (2) Name, surname and address of the person who is accused in the complaint (if available).
  - (3) The date that the complaint is filed.
  - (4) The date that the complained action took place.
  - (5) Factual information and description of complained actions which are within the scope mentioned above.
  - (6) Documentary evidence relating to the complaints (if any)

The management shall be acting as a case coordinator to register a complaint, giving a general examination as to adequacy of complaint information prior to transfer the case to

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a relevant party for fact finding. In case of uncertainty of the complaint, the Company may consider taking any appropriate action regarding related Laws, Rules and Regulations. Such actions will be under the principle of privacy and protection measurement for the complainants and witnesses in accordance with this policy.

4. The Company will protect the identities and personal information of the complainant or relevant witnesses at a Strictly Confidential level, in accordance with the onfidentiality and security of document rules of the Company.

In principle, when a complainant fully completes the complaint process, he/she will receive a registration number and code number to identify him/herself when contacting the Company. This Registration number and code number will replace the complainant's real name or personal information and identity during the investigation process. This is to protect and secure the identity and personal details or complainants or witnesses. Privacy and identity protection measures, however, can be modified or altered if the Company deems appropriate or necessary.

The Company will correspond to the complainant in the following ways:

- To confirm receipt of complaints or registration for complaint filing.
- To request for additional details and information
- To inform and update the progress or inform the result of the complaint consideration.
- Other correspondences deemed appropriate.
- 5. Consideration or investigation processes and determination of penalties will be in accordance with the rules, regulations or guidelines issued by the Company, or any relevant rules and laws.
- 6. The complainant shall be aware and understand that all complaints made to the Company must be in good faith and honest, and only truthful information be given. In the event that the complainant intends to give false information or to defame the organization or person(s) in the Company, the Company maintains the rights to enforce any action with the complainant according to the Company's procedures or relevant rules and regulations and can proceed to the relevant laws as appropriate.

Vincent Livet