



Whistleblowing Policy

Srisawad Capital 1969 Public Company Limited

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1. Objective

Srisawad Capital 1969 Public Company Limited (the “Company”) has established this **Whistleblowing Policy** concerning misconduct, fraud, and corruption to support and maintain an organizational culture of integrity and transparency, as well as to comply with the principles of Good Corporate Governance. By reporting leads regarding misconduct, fraud, and corruption through the Company’s designated channels, the Company aims to prevent and detect any damage that may arise from undesirable events.

Accordingly, the Company has established written guidelines for handling whistleblowing or complaints, including criteria, operational procedures, and clearly defined authorities and responsibilities for all relevant parties. Furthermore, the Company encourages and promotes strict compliance by all personnel with relevant laws, rules, and regulations. Whistleblowers or complainants shall be protected; the Company will maintain all information as confidential and proceed with speed, transparency, and fairness.

2. Scope of Implementation

This Whistleblowing Policy applies to the directors, officers, and employees of Srisawad Capital 1969 Public Company Limited and its subsidiaries. This includes permanent employees, temporary employees, employees under special contracts, and others. Every individual employed by the Company has a duty to comply with this policy, which is established as a fundamental standard for directors, officers, and employees to avoid behavior that violates whistleblowing or complaint related policies. Key principles regarding whistleblowing or complaints have been defined for collective adherence by all.

3. Definitions

- **Fraud** means an intentional act to conceal facts, forge information or documents, or refuse to provide relevant information. It includes the improper use of the Company’s confidential information, distortion or destruction of data, and deceiving others for personal gain. This

also covers theft, misappropriation of Company assets (such as using Company property for personal benefit), bribery, corruption, and improper financial management or reporting.

- **Serious Misconduct** means the intentional violation of, or failure to comply with, the Company's policies, rules, regulations, and practices, as well as applicable laws. It also includes any behavior that damages the Company's reputation, such as harassment, gambling, substance abuse, workplace violence, or neglect of employee safety.
- **Whistleblowing** means providing information or filing a complaint with the Company regarding actions related to illegal activities or violations of the Company's policies, rules, regulations, and Code of Conduct.
- **Whistleblower or Complainant (the "Reporter")** means an individual who reports leads or complaints regarding fraud, corruption, and/or serious misconduct through the reporting channels provided by the Company.
- **Whistleblowing Receiver** means the Audit Committee and the Whistleblowing Committee.
- **Whistleblowing Committee** consists of the Chief Internal Auditor and the Chief Compliance Officer.

4. Guidelines

4.1 Roles and Responsibilities of Employees and Rights of the Whistleblower

Every employee has a duty to report leads and/or any concerns regarding fraud, corruption, and serious misconduct within the Company. All employees must report such leads in good faith through the reporting channels provided by the Company. In this regard, such complaints must not be made with malicious intent or for the purpose of defamation; the Company reserves the right to consider subsequent disciplinary action in such cases.

Employees may consult the Human Resources Department if they are uncertain about reporting a lead, or they may consider the following questions to assist in their decision-making:

- Is the matter illegal, unethical, and/or in violation of relevant laws, rules, and regulations?
- Does the matter affect integrity and honesty?

- Is it a matter of fairness or correctness?
- Would it be shameful to tell your family, friends, or colleagues about it?
- If the public became aware of the matter, would it damage your reputation or the Company's reputation?

Whistleblowers are not required to find evidence to prove the lead they are reporting. However, it is not recommended that the reporter share the story with uninvolved parties or post it on social media, as the facts of the lead or complaint have not yet been verified by the relevant authorities. Additionally, the reporter has the right to remain anonymous or disclose information anonymously, unless disclosure is required by law. However, if the Company finds it necessary to disclose such information, it will disclose only what is essential. The reporter has the right to be informed of the progress or outcome of the reported lead; nevertheless, the reporter must also keep such information confidential.

4.2 Whistleblowing and Complaint Channels

The reporter can submit leads or complaints through the following channels. The Company will not track or investigate to identify the reporter if they choose to remain anonymous.

- **Company Website:** <https://www.srisawadcapital.co.th/th/contact-scap>
- **Postal Mail:**

Attention: Chief Executive Officer or Head of Human Resources

Subject: Whistleblowing (or Complaint) regarding Fraud and Corruption

Mailing Address: 99/392 Srisawad Building, 5th Floor, Soi Chaeng Watthana 10 Yaek 3 (Benjamit), Chaeng Watthana Road, Thung Song Hong Sub-district, Laksi District, Bangkok 10210

All received information will be gathered in a centralized database to ensure that such leads or complaints are processed or investigated promptly.

4.3 Information to be Provided

Only leads and/or concerns related to fraud, corruption, and serious misconduct should be reported through these channels. For general questions, comments, or complaints, please use

other channels provided by the Company. The reported information must contain sufficient details, such as the nature of the incident, the location where it occurred or is about to occur, the individuals involved, and the time of the incident. If the details provided are insufficient, the Company may be unable to proceed or conduct further investigation.

In this regard, the Company prioritizes reports concerning fraud, corruption, and serious misconduct, and will investigate the facts and take appropriate corrective actions.

4.4 Protection of Whistleblowers

Whistleblowers and complainants will be protected from unfair treatment or intimidation. Furthermore, the Company is prepared to consider additional protection measures as deemed necessary.

The Company does not tolerate any form of harassment, threats, or unfair practices. If such behavior is identified, the Company will pursue disciplinary action and/or legal proceedings against the violators.

5. Operating Procedures

5.1 The reporter may submit a lead or complaint regarding misconduct in writing and signed, addressed to the Whistleblowing Committee or the Audit Committee via the channels specified in this policy.

5.2 The receivers of the report must keep all information confidential and shall not disclose it to others. Any unauthorized disclosure of information will be subject to disciplinary action by the Company.

5.3 The Whistleblowing Committee shall initiate the process for considering the received reports by verifying the information and monitoring the case to determine whether there is a possibility of misconduct or suspicious behavior.

5.3.1 In cases where the allegations do not fall within the scope of or provide sufficient suspicion of fraud or corruption, and no investigation is required, the Chief Internal Auditor shall report the lead or complaint to the Audit Committee. If the Audit Committee has no

further concerns, the Chief Internal Auditor must notify the reporter of the reasons why no investigation will be conducted.

5.3.2 In cases where the allegations fall within the scope of or provide sufficient suspicion of fraud or corruption, and an investigation is necessary, the Chief Internal Auditor shall report to the Audit Committee. The Audit Committee may appoint an **Investigating Committee** to establish the facts or recommend appropriate corrective actions or disciplinary measures in accordance with the prescribed penalties.

5.4 The Chief Internal Auditor shall prepare a **Summary Report of Facts** to be presented to the Board of Directors through the Audit Committee.

5.5 Upon completion of the investigation, the Chief Internal Auditor shall notify the whistleblower of the investigation results.

5.6 All whistleblowing information and related documents shall be kept **strictly confidential** by the Whistleblowing Committee, with a retention period of no less than **3 years**.

6. Penalties

6.1 In the event that a violation is substantiated, the Company has prescribed the following penalties:

Type of Misconduct	Penalty
Non-Serious Misconduct	Issuance of the 1st Warning Letter
- Repeated complaint on the same action by the same individual	Issuance of the 2nd Warning Letter
- Repeated complaint on the same action by the same individual	Immediate termination of employment based on the two warning letters mentioned above.
Serious Misconduct	Immediate termination of employment

6.2 In cases where damage is caused to the Company, the offender shall be responsible for compensating the Company or any parties affected by such actions. This includes liability under civil and criminal laws, or as otherwise prescribed by law.

7. Confidentiality

All relevant parties must maintain strict confidentiality and disclose information only on a "need-to-know" basis. The Company will provide protection and implement measures to maintain confidentiality and safeguard all involved individuals (including both the whistleblower and the respondent). The disclosure of any information, including personal data, is strictly prohibited unless authorized or required by law.

If an employee is contacted by external parties such as reporters, other stakeholders, investors, or regulatory agencies—to inquire about an incident, the employee must respond as follows: *"I am not authorized to disclose any information regarding such whistleblowing or complaints."*

8. False Reporting

The whistleblower shall acknowledge and clearly understand that reporting must be conducted in good faith, without malicious intent to harass the organization or any individual, and without dishonest or unfair motives. If a whistleblower provides false information, the Company will take action against said whistleblower in accordance with Company procedures, regulations, or relevant laws, as deemed appropriate on a case-by-case basis.

9. Policy Review

The Company, through the Whistleblowing Committee, shall review the Whistleblowing Policy and guidelines and present them to the Audit Committee for approval on an annual basis. This is to ensure that the policy remains compliant with relevant laws, is effective, and aligns with the Company's objectives.

This policy shall be effective from **July 10, 2023**, onwards.