

Whistle Blowing Policy

Siamese Asset Public Company Limited (“**company**”) recognizes the importance of hearing the opinions, complaints and reporting of corruption and legal violations and strives to operate business honestly, with integrity and transparently in compliance with related laws and good corporate governance principles. Furthermore, the company is determined to combat corruption and misconduct in every form and method in the company and all company personnel. As such, the company has created the Whistle Blowing Policy (“**Whistle Blowing Policy**”) to create channels for directors, executives, employees and stakeholders to be able to file complaints or report clues out of honest intentions in cases of discovery of violations of the law, regulations, requirements, policies or business ethics of the company. Accordingly, the company will maintain the confidentiality of whistleblowers and issues of complaint to prevent rights violations against whistleblowers and to lead to personnel development, management improvements and investigations in to facts.

1. Scope of Whistleblowing or Complaints

In this Whistle Blowing Policy, whistleblowers and complaint filers can report clues or file complaints relating to important matters which might negatively impact the company, which include but are not limited to the following situations:

- (1) Legal violations or failure to comply with the regulations, requirements, anti-corruption policy and business ethics.
- (2) Actions, conduct or neglect of actions in accounting, reporting, transaction records and practice guidelines and/or financial reports or internal control which are suspicious or non-compliant to standards or general practice guidelines.
- (3) Risky activities that include corruption to duties, bribery and extortion.
- (4) Abuse of authority to seek illegitimate gains for the self or others.
- (5) Inappropriate disclosures of internal company information to outside parties.
- (6) Actions that create conflicts of interest.

2. Channels for Filing Complaints, Whistleblowing and Hearing Opinions

The company provides opportunities for directors, executives, employees and all interested parties inside and outside the company who encounter wrongdoing under Clause 1 to be able to report clues or file complaints via the following persons and channels:

- (1) Sending an email to the Internal Audit Department via the email cg@siameseasset.co.th; or
- (2) Sending registered post addressed to one of the report recipients as follows:
 - (a) An audit director, who is an independent director.
 - (b) The secretary of the Audit Committee.
 - (c) The company's secretary.

Do so by sending to the main office address of the company as follows:

Siamese Asset Public Company Limited

1077/48 Phahon Yothin Road, Sam Sen Nai Sub-district,

Phaya Thai District, Bangkok 10400.

- (3) Other channels include WhatsApp and Line@.
- (4) Website: www.siameseasset.co.th.

In doing so, whistleblowers and complaint filers are to state the names, addresses and contact telephone numbers of themselves clearly as well as the name of the person who committed wrongdoing and the circumstance of the wrongdoing by providing factually-accurate and reliable information along with witnesses and evidence (if any). However, whistleblowers and complaint filers may choose to not reveal themselves if they believe that doing so will cause loss of safety or any damage. However, if they reveal themselves, it will be possible for the company to report progress and explain facts to whistleblowers and complaint filers or to mitigate the damage suffered by whistleblowers or complaint filers more conveniently and more quickly.

3. Protection and Maintenance of the Confidentiality of Whistleblowers and Related Persons

- 3.1 Protection and maintenance of the confidentiality of whistleblowers and related persons will be provided immediately to said persons. Their information will be deemed secret and only disclosed as necessary with consideration to the damage and safety of complaint filers, informants, witnesses and related persons, unless disclosures are required by law.
- 3.2 Whistleblowers and complaint filers will be provided appropriate protection, e.g., they will not be transferred or relocated from their work position, job assignments and workplace, nor be suspended, threatened or harassed in their work, nor be terminated or subjected to any other unfair actions.

4. Process to Handle Whistleblowing or Complaints

4.1 Operating Measures

- (1) Complaint recipients are required to submit the complaints they receive to the Internal Audit Department without delay. Regardless of the case, actions have to be taken within 3 business days after receiving a complaint, by which the Internal Audit Department will gather facts and related documents and evidence to accompany considerations and filter information received from the whistleblower.
- (2) The Internal Audit Department has to consider and summarize results without delay. Regardless of the case, actions must be completed within 30 days after the date of receiving the complaint into consideration. If the Internal Audit Department cannot evaluate and summarize the complaint within the aforementioned time period, present the matter to the Chairman of the Audit Committee to request for approval of time extension, with each time extension being required to not exceed 30 business days.
- (3) After the Internal Audit Department finishes gathering facts and related documents and evidence, if it is determined that the complaint had substance, the Internal Audit Department will present the matter to the Audit Committee for consideration of appointment of a fact-finding committee.
- (4) Within 30 business days after the date of appointment, the fact-finding committee will conduct an investigation into facts and propose solutions to the Audit Committee for consideration of further instructions, solution guidelines and penalty considerations. In necessary cases in which actions cannot be completed within the required time period, the fact-finding committee is to make a proposal to the Chairman of the Audit Committee to request for time extension, with each time extension being required to not exceed 30 business days.
- (5) In cases of suspected serious wrongdoing or complaint against a member of the board of directors or a member of a sub-committee or a high-ranking executive, after the Audit Committee has considered the matter, propose solutions to the board of directors for consideration of further instruction and specification of solution guidelines and penalty considerations.

4.2 Reporting of Outcomes

After considerations have concluded, the Internal Audit Department is to summarize outcomes and notify the whistleblower or complaint filer of the consideration results and confidentially store related information.

5. Disciplinary Penalties

All employees and executives are required to strictly comply with policies. Cases of violation, neglect, refraining, agitation, recommendation, or encouragement for non-compliance in other persons or willful refusal to comply by the self will be deemed to be disciplinary violations, for which the company will consider administering penalties in accordance with the company's regulations. In addition, if said actions violate the law, the company will also consider taking related legal actions, and if the accused person is found to have actually committed wrongdoing as accused, the company will take the following actions:

- (1) If the person is a company employee, the person will be subjected to disciplinary penalties according to the appropriate considerations of the Audit Committee and the board of directors.
- (2) If the violation is a violation of any article of law, the person might be subjected to penalties prescribed by said article of law.

6. False Whistleblowing or Filing of Complaints

If the company discovers that whistleblowing or complaints or testimonies or any information are determined by evidence to have been done in dishonesty or are false, with willful intention to inflict damage, if the whistleblower or complaint filer is a company employee, the person will be subjected to disciplinary penalties or punishments according to the company's work regulations. However, if the whistleblower or complaint filer is an external party and the actions carried out by this external party led the company to suffer damage, the company will consider prosecuting said person in accordance with the law.