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## Whistleblowing Policy of Thai Credit Bank Public Company Limited for the Year 2024

## 1. Introduction

Thai Credit Bank Public Company Limited ("The Bank") recognises the importance of preventing fraud and misconduct that may arise from its operations and interactions with stakeholders, potentially impacting its business decisions and operations. Consequently, The Bank has established this Whistleblowing Policy to provide clear guidelines on effective handling of complaints regarding fraud and misconduct. This policy encompasses the mechanisms for complaint reception and the subsequent procedures for whistleblowing related to illegal activities, violations of The Bank's rules and regulations, its Business Code of Conduct, or any behaviours implying corruption by its personnel. Additionally, measures are in place to protect and provide fairness to whistleblowers regarding fraud or non-compliance with the law, The Bank's rules, regulations, Business Code of Conduct, Anti-Corruption Policy, and Good Corporate Governance Policy.

## 2. Objectives

- 2.1 To establish a framework for receiving and handling complaints from complainants in accordance with relevant operational procedures.
- 2.2 To enable employees to promptly report any indications of misconduct or suspicious behaviour that may arise from violation of laws, regulations, The Bank's work regulations, and Business Code of Conduct, including the Anti-Corruption Policy and the Good Corporate Governance Policy.
- 2.3 To ensure that the operations concerning the receipt of complaints, whistleblowing related to fraud or non-compliance with laws, rules, regulations, and The Bank's Business Code of Conduct, including the Anti-Corruption Policy and the Good Corporate Governance Policy, are accurate, appropriate, transparent, and efficient, consistent with the principles of good corporate governance and aimed at preventing risks of potential harm to The Bank.
- 2.4 To emphasize the importance of the whistleblowing process by employees and to protect whistleblowers by maintaining the confidentiality of their information and complaint details, which must not be disclosed to third parties.
- 2.5 To prevent risks and potential harm to stakeholders resulting from violations of laws, rules, regulations, The Bank's work regulations, and The Bank's Business Code of Conduct, including corruption, misconduct, or improper behaviour by The Bank personnel.

## 3. Definitions

"Wrongdoing"	means	an act or omission to act by The Bank personnel that contravenes or fails to comply with laws, rules, The Bank's working regulations and Business Code of Conduct, including the Anti-Corruption Policy, and the Good Corporate Governance Policy.
"Whistleblowing"	means	providing reliable information to The Bank regarding suspected wrongdoing.

"Whistleblower"	means	The Bank personnel, stakeholders, or individuals who witness wrongdoing.
"Complaint reviewer"	means	Chief Human Resources Officer
"Fact Investigation Committee"	means	a committee comprising the Chief Human Resources Officer, the Human Resources Management Strategy Division, the Policy/Regulation Division, and the Human Resources Operations Division, responsible for labour law compliance and practices.
"Secretary to Fact Investigation Committee"	means	personnel in the Policy/Regulation Division and personnel in the Human Resources Operations Division who are responsible for labour law compliance and practices.
"Personnel"	means	The Bank's Directors, executives, and employees.

#### 4. Scope of complaints and whistleblowing

4.1 A complaint may be filed against the The Bank personnel or any individual acting on its behalf under this policy for wrongdoing. However, The Bank cannot accept complaints in the following circumstances:

- 4.1.1 The matters already resolved by the general meeting of shareholders, The Bank's Board of Directors, the Executive Committee, the Chief Executive Officer, or the Managing Director within their respective powers and jurisdiction.
- 4.1.2 The matters already resolved by the Audit Committee.
- 4.1.3 Matters that are subject to ongoing litigation, adjudicated by the court, or have already been resolved by a final order.
- 4.1.4 Complaints from individuals who are not The Bank personnel and do not disclose their true identity and address.
- 4.1.5 Complaints that lack identification of witnesses or sufficient clues, evidence, or clear acts of fraud or misconduct to proceed with further investigation.
- 4.1.6 Matters received or adjudicated by the The Bank's human resources department or other competent agencies, resulting in a fair and final decision, with no new material evidence of significance.

#### 5. Whistleblowing channels

If an individual becomes aware of incidents where The Bank personnels violate or fail to comply with laws, principles of corporate governance, Business Code of Conduct, policies, and work regulations, including acts that may imply corruption, they are encouraged to report the matters through this or other appropriate channels for complaints and whistleblowing.

5.1 By e-mail

Email : [Employeeecare@thaicroditbank.com](mailto:Employeeecare@thaicroditbank.com)

5.2 By mail or orally.

Complaints should be addressed to Chief Human Resources Officer

Thai Credit Bank Public Company Limited

121/78-79 RS Tower, 26th Floor Ratchadapisek Road, Din Daeng Sub-District, Din Daeng District, Bangkok 10400

6. Complaint handling procedures

6.1 The Fact Investigation Committee investigates and gathers, processes, and scrutinises facts, relevant parties, and reaffirms claims and evidence received with the highest executive of the respondent's affiliated unit, and handles complaints as follows.

6.1.1 If the complaint involves malpractice, the Fact Investigation Committee must forward it to the fraud management department for investigation and further proceedings.

6.1.2 If the complaint involves personnel discipline, the Fact Investigation Committee must forward it to the human resources department for disciplinary actions under The Bank's regulations.

6.1.3 If the complaint involves internal management issues, the Fact Investigation Committee must coordinate with the top executives of the affiliated departments to promptly develop an action plan to address the issue in the complaints within 5 business days. The action plan must then be submitted to the Fact Investigation Committee for further consideration.

6.1.4 If the complaint involves other matters than those listed under 6.1.1, 6.1.2, and 6.1.3, the Chief Human Resources Officer, who serves as the recipient of the complaint, must review the content and forward it to the relevant unit or the affected party.

If the evidence is sufficient to substantiate the complaint, the complaint reviewer may instruct the Fact Investigation Committee to propose suitable remedies or initiate disciplinary actions that it considers to be appropriate.

6.2 All whistleblowing information and related documents must be kept confidential. The Fact Investigation Committee must retain the information and documents for at least 3 years.

6.3 If the complaint does not fall within the required scope or is not sufficiently suspicious to warrant a corruption investigation and an inquiry is unnecessary, the Secretary to the Fact Investigation Committee must prepare a document to inform the complainant of the outcome and provide reasons for not investigating the complaint.

## 7. Progress report and summary of complaint consideration

### 7.1 During the complaint review, the Secretary to the Fact Investigation Committee must—

- 7.1.1 prepare a progress report and present it to the highest-ranking executive of the respondent's work group through the Chief Human Resources Officer.
- 7.1.2 prepare and provide the progress report to the complaint if the complainant discloses their name;
- 7.1.3 prepare and provide the progress report to the complaint reviewer and the Fact Investigation Committee for their information if the complainant does not disclose their name.

### 7.2 When the complaint investigation completes, the Secretary to the Fact Investigation Committee must—

- 7.2.1 prepare a report summarising the facts and outlining guidelines for corrective actions, as well as the outcomes of disciplinary measures to be presented to the Chief Executive Officer or Managing Director through the Chief Human Resources Officer;
- 7.2.2 prepare a report summarising the facts and outlining guidelines for corrective actions, as well as the outcomes of disciplinary measures, or complaint investigations to be presented to the highest-ranking executive of the respondent's work group through the Chief Human Resources Officer;
- 7.2.3 prepare a report summarising the facts and outlining guidelines for corrective actions, as well as the outcomes of disciplinary measures, or complaint investigations to be presented to the complainant if they disclose their name;
- 7.2.4 prepare a report summarising the facts and outlining guidelines for corrective actions, as well as the outcomes of disciplinary measures, or complaint investigations to be kept in the complaint handling archive if the complainant does not disclose their name.

## 8. Protection measures for complainants and those who cooperate in investigating the fact investigation

- 8.1 A complainant and an individual involved in the investigation may withhold their identities if they believe that disclosure may jeopardise their safety or cause any form of harm. However, they must provide sufficient details of the facts or evidence that clearly indicate a reasonable basis to suspect fraudulent or unlawful activities, violation of articles of association, practices, or the Business Code of Conduct. Disclosure of identity enables the organisation to effectively report progress, provide a clear account of the facts, or expedite the process of mitigating damages.
- 8.2 will not demote, punish, or take any adverse action against the complainant or any personnel who refuse to engage in corruption.
- 8.3 The Bank will not disclose information that can identify the complainant or the complaint, as well as individuals who have cooperated in the investigation.

- 8.4 The complaint recipient must treat the relevant information as confidential and disclose it only to the extent necessary, considering the safety and well-being of the whistleblower or complainant, as well as individuals who cooperate in the fact investigation, the sources of information, or any related persons.
- 8.5 If the complainant and the person cooperating in the investigation believe that they may be unsafe or may suffer damages, they may request The Bank to establish suitable protection measures. Alternatively, The Bank may impose protection measures without a request if it considers that the matter will likely cause harm, damage, or insecurity.
- 8.6 The Bank will provide appropriate and fair procedures to mitigate the damages suffered by affected individuals.
- 8.7 If the complainant and individuals cooperating in the investigation report their concerns or raise questions in good faith, The Bank will not use it as a basis to take any adverse employment actions against them. This includes job transfer, demotion, suspension, or the reduction of benefits they are entitled to receive.
- 8.8 An individual must not retaliate against the complainant and anyone cooperating in the investigation.
- Retaliation against the complainant and individual cooperating in the investigation who report concerns or suspicions in good faith is a violation of ethical standards and may result in disciplinary action in accordance with The Bank's articles of association.
- 9. Penalties**
- 9.1 If the respondent has indeed committed a wrongdoing, they will be subject to disciplinary action as stipulated in the The Bank's regulations. Furthermore, if the wrongdoing violates the law, they may also face legal penalties, whether civil or criminal, or under applicable laws.
- 9.2 The Bank's personnel who treat others unfairly using inappropriate methods or causing harm, motivated by complaints, information, or allegations of wrongdoing, commit disciplinary offences that warrant punishment. The action may also result in legal consequences as prescribed by applicable laws if it violates the law.
- 10. Communication**
- 10.1 The Bank will communicate with and disseminate to its personnel this policy, as well as information about whistleblowing channels and avenues for complaints using various means such as orientation sessions for directors and new employees, training or seminars, internal communications within the workplace, and electronic systems. These efforts aim to ensure that its personnel genuinely understand and faithfully adhere to this policy.
- 10.2 The Bank will communicate with and disseminate to the general public, its subsidiary, as well as stakeholders this policy and information on channels for whistleblowing or complaints using various means such as its website, annual registration statement, and sustainable development report.

#### 11. Policy review and revision

To ensure that the policy is properly implemented in line with the prevailing circumstances and the banking transaction environment, The Bank mandates a periodic review of the Whistleblowing Policy, at least once a year or whenever significant changes impact this policy. The Bank may occasionally adjust or modify the policy, aiming to enforce it appropriately and effectively as The Bank may consider appropriate. This policy replaces and repeals the whistleblowing procedures