

Whistleblowing Policy

1. Objective

TISCO Group prioritizes preventing and suppressing all forms of fraud and corruption. Therefore, this whistleblowing policy has been established to strengthen transparent, honest, fair, and socially responsible business operations in line with good corporate governance principles. TISCO employees and other stakeholders who find or suspect non-compliance, unethical behavior, wrongdoing, fraud, malpractice, or violation of the code of conduct are encouraged to report to the provided channels.

This shall result in appropriate and timely case resolution, preventing widespread impact on employees and other stakeholders. The information shall also be used to review and improve business operations. Besides, the whistleblowing system shall promote a culture of integrity and adhere to the highest standards of professional ethics in performing work and providing customer service. Whistleblowers and information providers will be protected throughout the investigation and consideration process in a transparent, fair, and verifiable manner.

This policy aims to:

- Encourage raising concerns and questions about improper behaviors and misconduct at the earliest opportunity.
- Provide channels for whistleblowers to raise concerns and receive responses on any action taken.
- Reassure that the whistleblower and information providers will be protected from possible reprisals or victimization if making any disclosure in good faith.
- Handle the case properly with transparency and fairness to employees and related stakeholders.

2. Definitions

Term	Definition
Whistleblowing	The reporting through provided channels of improper behaviors by TISCO or its directors, management, employees, and persons who represent or work on behalf of TISCO.
Whistleblower	Employees and other stakeholders who find or suspect improper behaviors and report to TISCO according to the policy.
HR Help Line	A group of staff appointed to be whistleblowing channel for TISCO employees according to the announcement by HR.
Improper Behaviors	Any illegal acts or failure to act, non-compliance, unethical or suspicious behavior, actual or suspected fraud, wrongdoing, malpractice, or violation of the Employee code of conduct.

3. Policy

3.1 Role and Responsibility

Board of Directors

The Board of Directors of TISCO Financial Group Plc., the parent company, shall be responsible for establishing the appropriate TISCO Whistleblowing Policy, overseeing the implementation of the policy, and ensuring the governance and achievement of the policy's objective and the following.

- Ensure that management has implemented effective policy and procedure to ascertain the fair treatment of employees and relevant stakeholders.
- Support the proper remediation action of improper behaviors throughout the organization.
- Build and promote good corporate culture and ethics.

Governance and Sustainability Committee

- Review the Whistleblowing Policy, in consultation with the Executive Board (“EBD”), the Risk Oversight Committee (“ROC”), and Audit Committee (“AC”) to ensure effective governance structure in overseeing whistleblowing within TISCO Group.

Executive Board

The Executive Board of TISCO Financial Group Public Company Limited, with the delegated authority of the Board of Directors, has ultimate responsibility for overseeing the Anti-corruption practices of TISCO Group.

The Executive Board will:

- Oversee and monitor the anti-corruption program of TISCO Group to ensure compliance with the established Whistleblowing Policy and Guidelines as well as the related laws and regulations.

Risk Oversight Committee

Risk Oversight Committee will

- Oversee the management of corruption and fraud incidents through operational risk management system.

Audit Committee

As an independent oversight body, the Audit Committee should

- Provide assurance on the effectiveness of the whistleblowing system and procedures to the board.
- Be reserved as a channel for whistleblowers to report improper behaviors.

Group CEO

- Ensure the effective reporting channels, including the effective implementation of the Policy.
- Ensure the provision of necessary safeguards to protect whistleblowers from retaliation or victimization.

Compliance and Operation Control Committee

- Review and determine actions related to significant complaint cases as well as related correction and prevention.
- Approve the compensation made to relieve suffers of the person who received damage according to the approval authority.
- Oversee the communication with directors, management, and employees.

Employee Disciplinary Committee

- Consider the report of improper behaviors associated with the employee's wrongdoing and determine the appropriate disciplinary actions.

Members of the HR Help Line

- Be reserved as a channel for employees to report improper behaviors.
- Be responsible for considering the reporting cases, conducting the investigation process as deemed appropriate, and notifying investigation results to the reporter.
- For the case subject to disciplinary action, propose the investigation result to the Employee Disciplinary Committee for consideration.

Compliance Function

- Be reserved as a channel for whistleblowers to report improper behaviors.
- Proceed and handle the complaint cases/report of the improper behaviors according to the Complaint Management Guidelines.
- Report summary of whistleblowing report from external parties to Audit committee.

Human Resources

- Responsible for receiving, reviewing, and considering complaints reported through HR Help Line Channel.
- Proceed and handle internal complaint cases/report of the improper behaviors according to the HR Help Line Procedure.
- Report summary of whistleblowing report from employees to Audit committee.

Employees

- Report improper behaviors to the extent that they know or suspect any violation has occurred.
- Provide information that contributes to the case investigation.
- Seek appropriate guidance regarding their actions when necessary.

3.2 Principles

3.2.1 Reporting Illegal or Unethical Behavior or Retaliatory Action

With a strong intent of sustainable development on good corporate governance and transparent business operations, TISCO has advocated the following proceeding.

1. Promote the reporting of improper behaviors from any person.
2. Arrange sufficient and proper channels for reporting improper behaviors and thoroughly promote both internally and externally.
3. Set up a whistleblowing procedure to receive reports of improper behaviors from internal and external parties.
4. To support the investigation process, the reporters are requested to declare themselves by providing adequate information and/or supporting evidence. The reporters shall be treated anonymously and confidentially.
5. Provide necessary safeguards to protect whistleblowers from reprisals or victimization. Whistleblowers shall receive no retaliation or retribution for a report that was provided in good faith – not done primarily with malice to damage another or the organization. An employee who makes a report that is not done in good faith is subject to discipline.
6. No employee will suffer demotion, penalty, or other adverse consequences for reporting suspicious circumstances, even if such refusal or report may result in the company losing business.
7. Any actions that reveal the wrongdoing, unethical behavior, or violation of the Code of Conduct of any employees will be processed according to disciplinary guidelines of TISCO Group.

3.2.2 Channel for reporting improper behaviors

To encourage external parties or employees to report improper behaviors, TISCO has provided the reporting channels as follows.

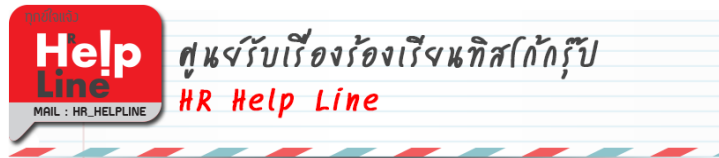
1. For External Parties:

Send the letter to The Chairperson of the Audit Committee or Corporate Compliance Function at

48/49 TISCO Tower, North Sathorn Road,
Silom sub-district, Bangrak District,
Bangkok 10500.

2. For Employees:

- 1st channel: File through the dedicated email "hr_helpline@tisco.co.th."



- 2nd channel: Directly call one of the members of the HR Help Line.

3.2.3 Process of Receiving and Handling the report of improper behaviors

Reporting from external party

For the case that the external whistleblower reports the improper behaviors either by sending the letter to TISCO according to the provided channels or filing report in person, the Corporate Compliance function shall be responsible to handle the case and report to relevant committees according to the Complaint Management Guidelines. The whistleblower shall receive a prompt response and update on case resolution on a timely basis. Compensation for affected complainants' suffering shall be considered appropriateness and approved according to the approval authority.

Reporting from employees

1. The employee should promptly report the suspected or actual event to his/her supervisor.
2. If the employee would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the employee could report the event to HR Help Line
3. Crimes against person or property, such as assault, burglary, etc., should be considered on a case-by-case basis by TISCO for reporting to local law enforcement personnel.
4. Supervisors, managers and/or HR Help Line who receive the reports must promptly act to investigate and/or resolve the issue. For the case that the supervisors/managers directly receive the suspect report from the Whistleblowers, the report shall also be made to the HR Help Line together with the preliminary investigation result. Subsequently, the proceeding shall be conducted according to the HR Help Line Procedure.



5. The investigation process shall be prudently conducted by persons without conflict of interest, and all pertinent documents shall be gathered and maintained appropriately as evidence.
6. Compensation for affected complainants' suffering shall be considered appropriateness and approved according to the approval authority.
7. The whistleblower shall receive a prompt response and a subsequent detailed report by HR Help Line within 15 business days of the initial report regarding the investigation, disposition or resolution of the issue. For the case that requires an extended investigation period, the progress of action to be taken as well as the expected timeline shall be kept the whistleblower updated.
8. If the investigation of a report that was done in good faith and investigated by internal personnel is not to the whistleblower's satisfaction, he/she has the right to report the event to the higher authority.
9. The whistleblower's identity shall remain confidential unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.
10. The case subject to disciplinary action shall be further proposed to the Employee Disciplinary Committee for consideration according to employee disciplinary guidelines.
11. The case revealed that employee misconduct shall be logged into the Incident – New Internal Workflow. The notable case shall be reported to the Compliance and Operation Control Committee and Audit Committee.