



Saksiam Leasing Public Company Limited Whistleblowing Policy

Introduction

Saksiam Leasing Public Company Limited (the "Company") realizes the importance of preventing fraud and misconduct that may arise from operations and interactions with stakeholders, which could affect the Company's business decisions and operations. Therefore, the Company has established a mechanism for receiving complaints and taking action in the event of whistleblowing regarding illegal acts, violations of the Charter and Code of Conduct, or behaviors that may indicate corruption by the Company's personnel. This includes appropriate protective measures for whistleblowers in accordance with this Whistleblowing Policy, serving as a clear practical guideline to ensure that receiving complaints regarding fraud and misconduct is efficient.

Any policy or announcement that conflicts with or contradicts this announcement shall be canceled and replaced by this one.

1. Objectives

- 1.1 To ensure that the process of handling complaints and whistleblowing regarding fraud, misconduct, and violations of the Company's regulations is appropriate, efficient, and compliant with good corporate governance principles.
- 1.2 To ensure that directors, executives, employees, and any person acting on behalf of the Company conduct business accurately, transparently, fairly, and accountably, in accordance with the law, good corporate governance, business ethics, and the Company's regulations.
- 1.3 To allow those who wish to report the actions of directors, employees, or any person acting on behalf of the Company that violate or are suspected of violating the aforementioned matters to inform the Company through the various channels provided by the Company.
- 1.4 To ensure that whistleblowers or complainants who cooperate with the Company in good faith receive appropriate and fair protection and defense against bullying resulting from the complaint.

2. Definitions

- 2.1 **Policy:** Refers to the Whistleblowing Policy.
- 2.2 **Company:** Refers to Saksiam Leasing Public Company Limited.
- 2.3 **Director:** Refers to a Company Director.
- 2.4 **Executive:** Refers to a person holding the position of Chairman of the Board, Managing Director, Deputy Managing Director, Manager, Assistant Managing Director, or a position equivalent to these titles.

- 2.5 **Employee:** Refers to a person who agrees to work for the Company under an employment contract.
- 2.6 **Supervisor:** Refers to a line manager at any level up to the Managing Director.
- 2.7 **Complainant:** Refers to a person or group of persons, which may be an employee, executive, or external party (e.g., customers, partners, and stakeholders) who is affected or may be affected by the Company's business operations, or who has witnessed inappropriate behavior contrary to the law, business ethics, good corporate governance policy, or related policies.
- 2.8 **Complaint:** Refers to a complaint regarding misconduct that falls within the scope of complaints specified in Clause 3 of this Policy.

3. Scope of Complaints

Individuals within the Company, external parties, or stakeholders can inquire, report clues, or make complaints through the reporting channels specified in Clause 5 of this Policy when there are doubts or observations that a Director, Executive, or employee of the Company has engaged in actions falling under the following cases:

- 3.1 **Misconduct:** Refers to an act that violates or fails to comply with the law, business ethics, good corporate governance policy, anti-corruption policy, Company regulations, or the rules of government agencies.
- 3.2 **Fraud:** Refers to any act aimed at seeking illegal benefits for oneself or others, which includes the following acts:
 - 3.2.1 *Embezzlement:* Refers to the possession of another person's property by dishonestly converting that property to oneself or another person.
 - 3.2.2 *Corruption:* Refers to the use of power acquired by duty to seek personal gain, or corruption by using or relying on one's position, power, and influence for the benefit of oneself or others.
 - 3.2.3 *Bribery:* Refers to the offering, promising, giving, receiving, or demanding of property or financial benefits, or as an incentive for a person to commit any act that is illegal, contrary to good morals, or breaches trust.
 - 3.2.4 *Financial Statement Manipulation:* Refers to deceiving others by communicating false information in financial statements or concealing the truth by overstating or understating assets or revenues, including incomplete disclosure of information.

However, the Company cannot accept complaints in the following cases:

- (1) Matters on which the Shareholders' Meeting, the Board of Directors, the Executive Committee, or the Managing Director has already made a final resolution within their scope of authority.
- (2) Matters on which the Audit Committee has already made a final resolution.

- (3) Matters currently under litigation in court, or where the court has already rendered a judgment or final order.
- (4) Anonymous letters, complaints, or allegations that do not specify the true name and address of the complainant or accuser.
- (5) Complaints that do not specify witnesses, lack clues or evidence, or do not demonstrate sufficiently clear acts of fraud or misconduct to further investigate the facts.
- (6) Matters that the Managing Director has received for consideration or has fairly made a final judgment on, and there is no new, materially significant evidence.

4. Roles and Responsibilities of Relevant Parties

- 4.1 **Complainant:** Includes all stakeholders who observe, know, or suspect in good faith—regardless of whether they have suffered damage—that a Director, Executive, or employee of the Company has engaged in misconduct under Clause 3. They can complain or report clues through the channels specified in Clause 5 at their convenience, and have the duty to cooperate by providing additional information (if any) until the complaint is resolved.
- 4.2 **Complaint Receiver:** Includes the Chairman of the Board, Managing Director, Internal Audit Department, or persons assigned by the Company to collect and consider the preliminary sufficiency of evidence, and forward valid complaints to the Complaint Investigator. The Internal Audit Department is responsible for setting data access rights regarding complaints, storing data, classifying complaint types, processing periods, reporting dates, recording progress, summarizing follow-up results, changing complaint statuses, resolved cases, and the proportion of resolved cases to total complaints. They also supervise the completion of complaint handling within the time specified by this Policy. If the Internal Audit Department is the subject of the complaint, the Managing Director has the authority to appoint a person or a committee to act as the Complaint Receiver and handle the matter instead.
- 4.3 **Subject of Complaint:** Refers to a Director, Executive, or employee of the Company who is complained against or accused by the Complainant of committing misconduct under Clause 3. If the Complaint Investigator finds that another person participated in, supported, hired, or ordered the act related to the complaint, that person shall also be considered a Subject of Complaint. The Subject of Complaint has the duty to explain or state facts as evidence appears, or by other appropriate and necessary means, to clear themselves of the complaint or accusation until all doubts are resolved, and is not considered guilty until a final decision is made that they are truly guilty.
- 4.4 **Cooperator in Complaint Investigation:** Refers to a Director, Executive, or employee of the Company requested to cooperate by the Complaint Receiver or Complaint

Investigator, or a person who may be related to the complaint. They have the duty to provide relevant information that may be necessary, useful, and sufficient for the consideration and judgment of the authorized investigator and decision-maker of the complaint.

4.5 **Complaint Investigator:**

4.5.1 In the case of a complaint falling under the scope of Clause 3 involving an employee position (non-executive), the Managing Director shall authorize a person or appoint a committee as the Complaint Investigator on a case-by-case basis, depending on the reason, appropriateness, and necessity of the complaint. The Complaint Investigator has the duty to report the facts based on the investigation to the Managing Director.

4.5.2 In cases where a Director or an Executive of the Company is the subject of the complaint, the Board of Directors will appoint a fact-finding committee to investigate appropriately. The Complaint Investigator must not have a conflict of interest with the complaint and has the duty to report the facts of the investigation to the Chairman of the Board.

4.6 The Managing Director is authorized to decide the final conclusion of the complaint and order penalties for those involved, except in cases where the decision and penalty involve a Director or an Executive of the Company, in which case it shall be considered by the Board of Directors.

5. **Complaint Reporting Channels**

The Company encourages Complainants to disclose their identity and/or provide clear and sufficient evidence regarding the misconduct of the Subject of the Complaint, including providing contact information as a communication channel with the Company. The Complainant can submit a complaint to the Complaint Receiver as per Clause 4.2 through the following designated channels:

5.1 In case of complaining about the misconduct of non-executive employees (Employees, Supervisors, Unit Heads, Senior Supervisors, Assistant Department Heads, Assistant Branch Managers, Department Heads, Branch Managers, Assistant Department Managers, Department Managers, Business Zone Managers):

5.1.1 *Telephone:*

Head of the Internal Audit Department
Tel. 0953212277 or 0872016051.

5.1.2 *Postal Mail:*

Head of the Internal Audit Department
Saksiam Leasing Public Company Limited, No. 49/47, Jetsadabodin Road, Tha It Subdistrict, Mueang Uttaradit District, Uttaradit Province 53000.

5.1.3 *Electronic Mail (E-mail):*



Internal Audit Department internal_audit@saksiam.co.th or
Managing Director siwaphong.boonsalee@saksiam.co.th

5.1.4 *Company Website:*

Topic: Report a Complaint via URL: <https://saksiam.com/contact>

Administered by the Internal Audit Department.

- 5.2 In case of complaining about the misconduct of executive-level employees (Assistant Managing Director, Regional Manager, Deputy Managing Director, or Managing Director):
Contact: Chairman of the Board via E-mail at supot.singha@gmail.com.

6. Protection of Complainants and Related Persons

- 6.1 To protect the rights of complainants and informants acting in good faith, the Company will conceal the name, address, or any information that can identify the complainant or informant, and keep their information confidential. Access to this information will be strictly limited to those responsible for receiving and investigating complaints.
- 6.2 In cases of complaints regarding corruption by Directors or Executives, the Audit Committee will serve to protect whistleblowers, complainants, witnesses, and persons providing information during the fact-finding investigation to prevent them from suffering trouble, danger, or injustice. This includes preventing changes in job positions or duties, work locations, suspensions, threats, interference with work, termination of employment, or any other act constituting unfair treatment resulting from the whistleblowing, complaining, acting as a witness, or providing information. Furthermore, those responsible for performing duties related to complaints must keep complaint information, documents, and evidence of the complainant and informant confidential and are prohibited from disclosing information to unauthorized persons, unless required by law.
- 6.3 To incentivize employees to report misconduct, the whistleblower will receive a reward of 5% of the damage value, not exceeding 50,000 Baht. The reported complaint or clue must be proven up to the stage of penalizing the wrongdoer before the reward is granted, and the misconduct can be reported through the channels in Clause 5.
- 6.4 Additionally, the Company assigns relevant personnel to analyze the causes of the problems to establish solutions or additional measures to prevent recurrence.

7. Action and Reporting

7.1 Action

- 7.1.1 The Complaint Receiver must forward the matter to the Complaint Investigator within 7 working days from the date of receiving the complaint. If it cannot be completed within the specified time, the Complaint Receiver shall propose to the Managing Director or the Chairman of the Board, as



applicable, in writing to consider approving an extension of the preliminary evidence gathering period as appropriate and necessary. If the Managing Director or the Chairman of the Board personally receives the complaint, they shall forward it to the Internal Audit Department for further action. However, if the Internal Audit Department is the subject of the complaint, the Managing Director has the authority to appoint a person or a committee to act on their behalf.

- 7.1.2 The Complaint Investigator must consider and report the conclusion of the complaint to the Managing Director or the Chairman of the Company, as applicable, within 30 working days from the date of receiving the complaint from the Complaint Receiver. If it cannot be carried out within the specified time, the investigator shall propose to the Managing Director or the Chairman of the Board, as applicable, in writing to consider approving an extension of the investigation period as appropriate and necessary.
- 7.1.3 The Managing Director or the Chairman of the Board, as applicable, shall make a decision on the complaint where the investigation has concluded within 7 days from the date of receiving the facts of the complaint from the Complaint Investigator.
- 7.1.4 The Complaint Receiver shall notify the complainant and other related persons of the decision regarding the complaint from the Managing Director or the Chairman of the Board, as applicable, within 3 days from the date of receiving the decision result.
- 7.2 Reporting
 - 7.2.1 The Complaint Receiver is responsible for reporting the conclusion of the complaint to the Complainant, the Subject of the Complaint, Cooperators in the investigation, Executives, or other persons as necessary and appropriate.
 - 7.2.2 In cases where the Complaint Receiver and/or the Complaint Investigator review preliminary evidence and find that the complaint may significantly impact the Company's reputation, business operations, and/or financial status, they must report the matter to the Managing Director or the Chairman of the Board immediately for further consideration and action.
 - 7.2.3 The Complaint Receiver is responsible for preparing a complaint registration log and preparing a summary report to be presented to the Audit Committee for acknowledgment at least once every quarter.



8. Penalties

- 8.1 If the accused has indeed committed the offense or corruption, the offender—whether a Director, Executive, or employee—shall be considered to have violated the Anti-Corruption Policy, Charter, and Code of Conduct. They must face disciplinary action according to the work regulations specified by the Company, and if the offense is illegal, the offender must face legal penalties, both civil and criminal, as well as under other laws. The Complaint Investigator shall indicate the maximum penalty based on the circumstances, and the Managing Director or the Chairman of the Board, as applicable, will make the final and definitive ruling.
- 8.2 Anyone who intentionally or negligently acts in non-compliance with this Policy, including engaging in bullying, threatening behavior, disciplinary punishment, or unfair discrimination against a complainant, whistleblower, or person related to a complaint or clue under this Policy due to their whistleblowing, shall be considered in breach of discipline. They must be responsible for compensating for damages to the Company or the affected person, and will also face civil, criminal, or other legal liabilities.

9. Communication

- 9.1 The Company provides communication and dissemination of the Whistleblowing Policy, including channels for reporting clues or complaints, to Directors, Executives, and employees of the Company through various channels. These include new director and employee orientation, annual training or seminars, bulletin board postings, internal organization management systems (Intranet), emails, and the Company website, ensuring that everyone in the organization is aware of and strictly understands how to comply with this policy.
- 9.2 The Company communicates and disseminates the Whistleblowing Policy, including reporting channels, to the public, subsidiaries, associate companies, as well as relevant business agents, business partners, and stakeholders through various channels, such as the Company website, annual report, and annual registration statement. This is to build understanding and encourage adherence to corporate social responsibility standards regarding anti-corruption, similar to the Company.

The Whistleblowing Policy was approved by the Board of Directors at Meeting No. 3/2023 on May 11, 2023.

Announced on May 24, 2023.

(Mr. Siwaphong Boonsalee)

Managing Director