



WHISTLEBLOWING POLICY
SCB X PUBLIC COMPANY LIMITED

INDEX

Objectives	1
Definitions	1
Scope of Whistleblowing	2
Person eligible to file the complaint	3
False whistleblower report	3
Relevant parties and their duties	4
Protection of the whistleblower and related parties	4
Whistleblowing investigation	5
Investigation period	6
Reporting channels	6
Penalty	6
Appendix	7

WHISTLEBLOWING POLICY

SCB X PUBLIC COMPANY LIMITED

Objectives

SCB X Public Company Limited (SCB X PCL.) has operated its business in accordance with its good corporate governance framework to demonstrate the transparency and accountability in doing business. Hence, to comply with the good corporate governance principle, the Company has formulated the whistleblowing policy with its main objectives as described below:

- 1) To set out the proper, straightforward, and efficient procedures for the receiving of complaint, the provision of clue about Corruption, Wrongdoing, and failure to comply with the Company's Regulations including the violation against laws;
- 2) To encourage the Director, Employee, and Any Person acting on the Company's behalf to conduct business in a correct, transparent, fair, and verifiable manner, and in accordance with applicable laws, good corporate governance and business ethics, including the Company's Regulations;
- 3) To set out the Company's reporting channels for the whistleblower who wishes to file the complaint or clue about the performance of the Director, Employee, or Any Person acting on the Company's behalf that violated or has been suspected to violate the abovementioned matters;
- 4) To provide the whistleblower and the person who cooperates in good faith with the Company with the custody and the appropriate and fair protection from retaliation due to the whistleblowing.

Definitions

"Company" means SCB X Pcl. and SCB X Group

"Director" means the Company's director.

"Employee" means the executive, employee in any job level, and any person engaged to work under the employment contract, regardless of whether such person works under the fixed-term or open-ended contract.

"Any Person" means the person having a contractual relationship with the Company and acting on the Company's behalf, the person being appointed by the Company's authorized representative, the contractor, including the broker or sales agent, etc.

"Subject of the Complaint" means the person who is accused, or the person appears in the clue, and there are reasonable grounds or evidence to believe that such person may have committed a Wrongdoing as accused or as appeared in such clue.

"Regulations" mean the work rules, operation guidelines, requirements, or any rule regardless of its name, those are in full force and effect.

"Wrongdoing" means any act that violates or does not comply with laws, Company's Regulations, good corporate governance, and business ethics, including any kind of misconduct in the forms and circumstances as specified in Article 1.

"Fraud" means any unlawful act done to obtain illegitimate advantage for the benefit of the person committed fraud or for the benefit of another person, including the following acts:

- **"Theft"** means the act of dishonestly taking away the property of other person or which the other person being the co-owner with the intention to possess such thing for the benefit of the person taking away such property, or with the intention to sell it or to give it to third party.
- **"Misappropriation"** means the possession of the property belonging to other person or which the other person being the co-owner, and dishonestly converting such property to the possessor or third party.
- **"Corruption"** has the same meaning as "Corruption" in the Anti-Corruption Policy.
- Additionally, it shall include, without limitation to, the acceptance of gift, hospitality, or any improper advantages, the procurement and contract improperly made, as well as any act resulting in conflict of interest.

Scope of Policy

1. Scope of Whistleblowing

1.1 Director, Employee, or Any Person acting on behalf of the Company may be the Subject of the Complaint according to this policy if he/she violated or failed to comply with laws or the Company's Regulations that include the good corporate governance policy, the anti-corruption policy, and the Company's code of business ethics.

The enforcement mechanism under this policy may be extended to cover various kinds of Wrongdoing, including, without limitation to, the following circumstances:

- Criminal offence or encouragement to commit a Wrongdoing;
- Fraud which is directly or indirectly in connection with the organization;
- Any act of risk-taking including Fraud, bribery, and coercion;
- Failure to comply with laws that materially affecting the Company;
- Act, behavior, or omission done in relation to accounting, report, bookkeeping, and practice and/or financial reporting or internal audit those are suspicious or non-compliance with the standard or generally accepted practice;
- When an incident harmful to anyone's health or safety takes place.
- When an incident damaging the environment takes place.
- Any act of gross misconduct or non-compliance to the Company's business ethics;
- Any act intentionally damaging the Company, causing bad reputation to the Company, or causing loss of the Company's benefit;
- When the rectification or the reasonable work procedure cannot be conducted where the unavoidable incident takes place, and it may cause any expenses incurred or cause material damage to the Company;
- Intentional concealment of any abovementioned Wrongdoings.

1.2 The Company encourages the whistleblower to disclose his/her identity (only to the reporting channels) and/or give sufficient solid information relating to the Wrongdoing. The whistleblower shall be protected in accordance with Article 5.

1.3 In the case the whistleblower does not disclose his/her identity, the complaint coordinator shall consider upon receipt of the information supporting the complaint whether or not the factual information or evidence provided is solid and sufficient. The complaint coordinator shall not accept the following matters:

- (1) The matter that the witness, evidence, behavior, or Wrongdoing cannot be clearly specified to enable further investigation.

(2) The matter that Internal Audit department / Human Resources department or any department having the authority has accepted for consideration, or has fairly made the final decision on without any additional important evidence newly provided.

2. Person eligible to file the complaint

Anyone knowing about the Wrongdoing or its clue, or anyone honestly suspecting that the Wrongdoing may be committed by Director, Employee or Any Person acting on the Company's behalf shall have the right to file the complaint, regardless of whether or not he/she has been negatively impacted from such Wrongdoing. The Company encourages the whistleblower to disclose his/her identity and/or gives sufficient solid information and supporting evidence in connection with the behavior of Subject of the Complaint. The whistleblower shall also inform the Company of his/her contact point for further communication with the Company.

3. False whistleblower report

In the case where there is sufficient solid evidence showing that the whistleblower has dishonestly filed a complaint or accused the Subject of the Complaint (such as the disclosure of personal complaint, or the intention to cause partiality in the Company), or where there is sufficient solid evidence showing that the complaint is the information that Employee truly disbelieves (such as rumor), or in the case the information disclosure is made for personal benefit, those aforesaid circumstances are considered as disciplinary violations, and they may be considered as gross misconduct. In such case, the Company shall conduct further investigation to determine the punishment pursuant to the Company's Regulations. The Company must necessarily follow the procedures described below to protect the reputation of the Subject of the Complaint:

3.1 If the whistleblower is the Employee, the investigation must take place to consider the punishment in accordance with the **Company Regulations**.

3.2 If the whistleblower is the external party and the Company has suffered from bad reputation, the Company may start legal proceedings against such whistleblower.

4. Relevant parties and their duties

4.1 The Company's board of Directors shall assign the audit committee to supervise and set out the guidelines for the administration and management of complaint received via the reporting channels.

4.2 The audit committee shall appoint a person who works independently and reports directly to the audit committee to be the recipient of complaint filed via the reporting channels as specified in Article 8. The whistleblowing report shall be made and presented to the audit committee every quarter.

4.3 Internal Audit department / Human Resources department or the person assigned by the audit committee shall administer, manage, collect, screen, inspect the complaint or clue received, and preliminary consider the validity of evidence. Internal Audit department shall consider the complaint or clue in connection with the Fraud or the Wrongdoing that is relevant to the business process. If the complaint or clue is about the misbehavior of the Subject of the Complaint, Human Resources department shall conduct the consideration. If the complaint is found correct, the inspection shall be conducted to collect evidence and witness for further actions in accordance with the Company's Regulations.

- 4.4 The Subject of the Complaint are Director, Employee, or Any Person acting on the Company's behalf whom the concern about him/her is raised or whom is accused by the whistleblower that such Subject of the Complaint has committed a Wrongdoing as specified in Article 1.
- 4.5 When considering the complaint or the clue, if other person is found to be the collaborator, supporter, hirer, or commander of the Wrongdoing raised in the complaint, such other person shall also be deemed to be the Subject of the Complaint.
- 4.6 The person cooperating in the inspection of the complaint are Director, Employee or external party asked by the department considering the complaint for the information about the complaint or the information that may be in connection with the complaint.

5. Protection of the whistleblower and related parties

- 5.1 The whistleblower has the right not to disclose his/her identity if he/she sees the identity disclosure will detriment him/her; however, he/she must give sufficient details or evidence to the extent demonstrating that there are reasonable grounds to believe that there is a violation to laws, the Company's work rules, Regulations, corporate governance policy, or business ethics. Nevertheless, the Company encourages the whistleblower to disclose his/her identity and give sufficient solid information supporting the complaint.
- 5.2 In order to protect the right of whistleblower and to prevent him/her from intimidation due to the complaint filing or information giving, the Company shall conceal the name, address, or any information that the whistleblower and informant may be identifiable, and the Company shall keep the information regarding the whistleblower and informant in secrecy. Such information shall be accessible only by the person responsible for the inspection of whistleblowing ("**Related Person**"). The Related Person knowing of the whistleblowing or information related to such whistleblowing shall keep all such information in secrecy, and shall not disclose it to other persons, except for the necessity to comply with the laws or for the inspection of the complaint only. If the Related Person intentionally discloses such information in violation of the aforesaid restrictions, the Company will punish such Related Person in accordance with the Company's Regulations and/or applicable laws, as the case may be.
- 5.3 If the whistleblower is the Director, Executive, or Employee of the Company, such whistleblower shall be protected properly and fairly by the Company: there shall be no change in job title or job types, workplace, no suspension of work, no threatening, no interference while working, no termination of employment, or no any other act unfair to the whistleblower. However, if the whistleblower sees he/she may be in trouble or be detrimental because of information giving, such whistleblower may request the Company for setting out the appropriate protective measures.
- 5.4 For the Employee who improperly interacts with the whistleblower whereby the incitement of such improper interaction results from the fact that the whistleblower has filed the complaint or given the information to the Company, such Employee shall be considered that he/she has committed a disciplinary violation and shall be subject to the Company's punishment.
- 5.5 Any person suffered from the whistleblowing or information giving shall be remedied by the suitable and fair methods or procedures.

6. Whistleblowing investigation

Internal Audit department / Human Resources department shall coordinate with any person or organization or committee in charge of the whistleblowing to conduct the inspection, propose the resolution, rectification, and prevention of the matter concerned, and shall inform the whistleblower and the relevant organization of the summary of the consideration result within 10 working days. After that, the matter concerned shall be passed on to the related department for further action, and the case shall be closed within 30 working days.

6.1 The inspection and collection of the fact shall be responsible by the persons as described below ("**Inspector**"):

If the Subject of the Complaint is the Employee in the job level lower than Chief Executive Officer:

Chief Executive Officer and/or the person or department assigned by Chief Executive Officer shall be the Inspector and shall report to the audit committee.

If the Subject of the Complaint is the Employee in the same job level as Chief Executive Officer or higher:

the audit committee and/or the person or department that the audit committee assigned to be the Inspector shall conduct the inspection.

In this case the Inspector can invite any Employee to give information or ask for the document related to the complaint for the purpose of fact-finding.

6.2 If there are reasonable grounds to believe that the Subject to the Complaint actually committed a wrongdoing as specified in Article 1.1, the Subject to the Complaint shall be informed of the accusation, and shall have the right to prove that he/she is innocent by demonstrating the supporting information or evidence confirming that he/she has no connection with the Corruption as accused.

7. Investigation period

The investigation shall start as soon as possible, considering the severity of the accusation or the complaint, and it shall be conducted cautiously to avoid any impact on the quality and details of the investigation. The preliminary inspection shall aim for the summary of inquisition within the suitable period and shall be in accordance with the procedures as specified in Article 6

8. Reporting channels

The whistleblower can file the complaint or provide the clue, by specifying clearly that it is the confidential document, via the reporting channels as listed in the Appendix.

9. Penalty

After the Inspector conducted the investigation and found that the Subject of the Complaint intentionally violated this policy and has unfairly intimidated, threatened, or discriminated the whistleblower or the source or the person related to the complaint according to this policy because the fact that the complaint was filed or the clue of Wrongdoing was informed, such Subject of the Complaint shall be considered he/she has committed the disciplinary violation. The disciplinary committee shall impose the punishment according to the Company's disciplinary regulation, and such Subject of the Complaint shall remedy the Company, or the person suffered from the afore mentioned actions. The Subject of the Complaint shall be further faced the penalty regarding the civil laws or criminal laws or other applicable laws.

APPENDIX

Reporting channels

- 1) By postal mail
P.O. Box 177 Chatuchak 109002)
- 2) By electronic mail (E-mail)
E-mail address: whistleblower@scbx.co.th
- 3) Through the Company's website
Website: <http://www.scbx.co.th>
- 4) By telephone
Telephone number 02 544 3000