

Whistleblowing Policy
SCBX Public Company Limited

Change Control Table

Version	Effective Date	Key Updates
1.0	November 2021	Initial Policy Launch
2.0	July 21, 2025	<ol style="list-style-type: none">1. Added a new section defining the scope of the policy.2. Section 5: Expanded to include protections for whistleblowers and concerned persons, including a “No Tolerance for Retaliation” clause to align with DJSI compliance requirements.3. Section 10: New content added regarding policy review and updates <p>These updates were endorsed by the SCBX Board of Directors at Meeting No. 11/2025 held on July 21, 2025.</p>

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Objectives

SCBX Public Company Limited (the “Company”) operates its business under a framework of good governance, transparency, and accountability. To uphold the principles of good corporate governance, the Company has established a Whistleblowing Policy with the following key objectives:

- 1) To establish a structured, appropriate, transparent, and effective process for receiving complaints, whistleblowing on fraud, misconduct, violations of Company regulations, laws, governance principles, and business ethics.
- 2) To provide reporting channels for individuals who wish to notify the Company of misconduct, or actions that violate—or are suspected to violate—the aforementioned matters, committed by directors, employees, or representatives of the company.
- 3) To ensure that whistleblowers and individuals who cooperate with the Company in good faith are appropriately and fairly protected, including being safeguarded from retaliation resulting from their whistleblowing or cooperation.

Scope of Policy

This policy applies to SCBX Public Company Limited and its subsidiaries. Each subsidiary shall adopt and implement the policy in accordance with its operational context.

Definitions

Company	: SCBX Public Company Limited.
Director	: Company’s directors.
Employee	: Includes executives, staff members at all levels, and contract employees regardless of their employment or hiring period.
Any Person	: Individuals acting on behalf of the Company, including authorized persons, contractors, agents, and sales representatives, etc.
Regulations	: Formal work rules, procedures, and other enforceable guidelines or requirements, regardless of the name by which they are referred.
Misconduct	: Any violation of laws, Company regulations, governance policies, or business ethics, including any actions, behaviors, or incidents as outlined in Section 1.1.
Fraud	: Any unlawful act committed to obtain undue benefits for oneself or others, including the following: <ul style="list-style-type: none">• Theft: The act of dishonestly taking property that belongs to another person or is jointly owned, with the intent to possess, sell, or transfer it to a third party for personal gain.• Embezzlement: The misappropriation of property belonging to another person or jointly owned, while lawfully in possession of such property, for the benefit of oneself or a third party.• Corruption: As defined in the Company’s <i>Anti-Corruption Policy</i>.

1. Scope of Complaints or Whistleblowing

1.1 Complaints may be filed against directors, employees, or representatives for violations of laws, Company regulations, governance policies, anti-corruption policies, or business ethics.

Incidents that may trigger mechanisms under this Policy include but are not limited to various forms of misconduct, such as:

Incident	Description
(1) Criminal offenses	Criminal offenses include, but are not limited to, bribery, extortion, and abetting others to commit these offenses.
(2) Organizational fraud	Corruption in the organization, whether direct or indirect, includes the deliberate concealment of information or wrongdoing to avoid investigation, and actions that lead to conflicts of interest in violation of the Company's policies.
(3) Accounting irregularities	Illegal acts or omissions related to accounting or financial reporting, including non-transparency and non-compliance with generally accepted accounting standards or practices.
(4) Violations of external laws/regulations	Illegal acts without criminal intent or violations of external regulations that have a substantial impact on the Company, including failure to comply with environmental standards or actions resulting in environmental harm.
(5) Ethical breaches, neglect of duties, non-compliance with internal control requirements	Violation of the Company's Code of Conduct, including failure to fulfill duties as outlined in Company regulations, where such failures do not constitute criminal offenses, as well as negligence in resolving issues or any deliberate actions that harm the Company's reputation or interests
(6) Health and safety violations	Human rights violations that harm the physical and mental health and safety of employees and other concerned persons.
(7) Other misconduct	Incidents of misconduct other than those mentioned under Items (1) to (6)

1.2 The Company encourages whistleblowers to disclose their identities exclusively to the designated whistleblowing channels and to provide clear and sufficient evidence of misconduct. Protection will be granted under Section 5.

- 1.3 Whistleblowers may withhold their identities if disclosure could result in personal harm. However, they must provide detailed and credible information that reasonably indicates a violation of laws, regulations, Company policies, corporate governance principles, or the Code of Conduct. The Company nevertheless urges whistleblowers to disclose their identities and submit clear evidence to support their cases.

If a whistleblower chooses not to disclose their identity, he/she must ensure that the information provided contains clear and sufficient facts or evidence to support the complaint or report. Complaints and reports in the following cases will not be accepted:

- (1) Cases lacking specific witnesses, evidence, or sufficiently clear circumstances of wrongdoing to initiate a fact-finding investigation.
- (2) Cases previously reviewed and concluded by the Internal Audit department, Talent department, or authorized department, with no new material evidence presented.

2. Whistleblowing Channels

All reports shall be clearly marked “Confidential” and submitted via any of the following channels:

- 1) Mail: P.O. Box 180, Chatuchak Post Office, Bangkok 10900
- 2) Email: whistleblower@scbx.com
- 3) Phone: 02 544 3000

3. Eligible Whistleblowers

Any individual—regardless of personal impact—who becomes aware of, suspects, or holds credible information about potential misconduct by a director, employee, or any person acting on behalf of the Company is encouraged to report the matter. The Company urges whistleblowers to disclose their identity, provide clear and sufficient evidence of the alleged misconduct, and provide contact details to facilitate communication with the Company.

4. Parties Involved in the Complaint or Whistleblower Investigation Procedure and Their Responsibilities

- 4.1 The Board of Directors assigns the Audit Committee to oversee and establish guidelines for managing complaints or whistleblowing reports submitted through designated channels.
- 4.2 The Audit Committee shall appoint individuals who are independent in their duties and report directly to the Audit Committee to serve as recipients of complaints or

whistleblowing reports submitted through the specified channels outlined in Section 2. Quarterly reports shall be prepared and submitted to the Audit Committee.

- 4.3 A complaint or whistleblower investigator ("the Investigator") refers to the Internal Audit department, Talent department, or designated individuals responsible for collecting, screening, and investigating complaints or whistleblowing reports, as authorized as follows:
 - 4.3.1 In cases where the subject of the complaint holds a position at the level of Chief Executive Officer (CEO) or above, the Investigator shall be appointed by the Audit Committee.
 - 4.3.2 In cases where the subject of the complaint holds a position below the CEO level, the Investigator shall be appointed by the CEO.

The Internal Audit department shall handle complaints or whistleblowing reports related to fraud or misconduct involving business processes. The Talent department shall handle reports concerning inappropriate behaviors by the subject of the complaint. If the allegations are found to have merit, evidence and witness statements shall be gathered, and further investigation shall be conducted in accordance with Company policies.

- 4.4 The subject of the complaint refers to an individual accused of misconduct, where there is reasonable ground or credible evidence suggesting possible wrongdoing as per a complaint or whistleblowing report. This may include directors, employees, or any persons acting on behalf of the Company. If, during the investigation, others are found to have jointly committed, supported, ordered, or instigated the misconduct, such individuals shall also be considered subjects of the complaint.
- 4.5 A cooperating party in the investigation refers to directors, employees, or external individuals who are requested by the unit responsible for reviewing the complaint or whistleblowing report to provide information that is relevant to, or potentially linked to the matter under review.

5. Protection for Whistleblowers and Concerned Persons

- 5.1 The Company maintains a strict No Tolerance for Retaliation policy against whistleblowers and those cooperating in investigations. Any act of harassment, intimidation, discrimination, or other retaliatory behavior—whether direct or indirect—resulting from the filing of a complaint or the provision of related information constitutes a serious violation of Company policy and will be subject to disciplinary measures as outlined in Section 9.
- 5.2 To safeguard the rights of whistleblowers, the Company will protect their identity, address, and any identifiable information, as well as that of individuals providing supporting information. All data will be kept confidential and accessible only to

those responsible for investigating complaints (“Relevant Personnel”).

Relevant personnel who receive or access complaint-related information must maintain strict confidentiality and are prohibited from disclosing such information to others, except where disclosure is required by law or for investigative purposes. Intentional breaches of confidentiality will result in disciplinary action under the Company’s work rules and regulations and/or legal proceedings, as applicable.

- 5.3 Directors, executives, or employees who file complaints or whistleblowing reports will receive fair and appropriate protection from the Company. This includes protecting them from unfair treatment, such as changes to job roles, responsibilities, work location, suspension, intimidation, interference with duties, dismissal, or any other unfair actions. If a whistleblower believes they may face harm or adverse consequences for providing information, they may request the Company to implement additional protective measures.
- 5.4 Any individual who suffers harm as a result of filing a complaint or providing information will be entitled to appropriate and fair remedies through measures or processes determined by the Company.

6. Complaint and Whistleblower Investigation Procedure

Upon receiving a complaint or whistleblowing report, the Investigator shall proceed as follows:

- 6.1 Promptly coordinate with concerned individuals, departments, or responsible committees to initiate an investigation without delay.
- 6.2 Summarize the findings, propose solutions and preventive measures, and inform the whistleblower and relevant departments of the progress within 10 business days. Where necessary, the matter may be referred to the appropriate departments to carry out further procedures, which should be completed within 30 business days, subject to the complexity of the case.
- 6.3 In cases where there is credible evidence indicating that the accused has committed the acts described under Section 1.1, the Investigator shall formally notify the accused of the allegations. The accused shall be given an opportunity to defend themselves by providing additional information or evidence demonstrating their non-involvement in the alleged misconduct.

7. Investigation Period

The investigation shall commence as promptly as possible, taking into account the severity of the allegation or complaint. It shall be conducted carefully to ensure that the quality and detail of the investigation are not compromised. Preliminary findings should be concluded within a reasonable timeframe and in accordance with the procedures outlined in Section 6.

8. False Information Reporting

In cases where there is clear and sufficient evidence that a whistleblower has acted in bad faith—such as filing a complaint with dishonest intent, disclosing personal grievance information, deliberately causing internal conflict, or submitting information that the employee does not genuinely believe to be true (e.g., rumors), or has disclosed information for personal gain—such actions shall be considered a disciplinary offense and may constitute serious misconduct. The Company will initiate an investigation to determine appropriate disciplinary action and will take necessary steps to protect the reputation of the individual subject to the complaint, as follows:

- 8.1 If the whistleblower is an employee, an investigation will be conducted to consider disciplinary action in accordance with the Company's work rules and regulations.
- 8.2 If the whistleblower is an external party and the Company suffers damage as a result, legal action may be considered against the whistleblower.

9. Disciplinary Actions

After finding facts, if the Investigator determines that the individual subject to the complaint has deliberately violated this policy—including engaging in harassment, intimidation, or unfair discrimination against the whistleblower or any person involved in the complaint or whistleblowing report—such conduct shall be considered a disciplinary offense.

The Disciplinary Committee shall investigate and determine appropriate penalties in accordance with the Company's work rules and regulations. The offending party shall be held responsible for compensating the Company and/or any affected individuals for damages resulting from the misconduct, and may also be subject to legal liability, civil, criminal, or other legal proceeding as applicable.

10. Policy Review and Updates

This Whistleblowing Policy will be reviewed at least every two years or upon significant changes