



**ASSETwise**

## **Whistleblowing Policy**

AssetWise Public Company Limited

## WHISTLEBLOWING POLICY

### 1. Introduction

AssetWise Public Company Limited and the Group (“Company”) are committed to conducting businesses in accordance with the highest ethical and legal standards to ensure transparency, accountability, and fairness to all parties concerned. In line with this commitment, this Policy has been established to provide channels for employees and stakeholders to raise concerns or report any misconduct, including fraudulent or corrupt acts and violation of the Company’s policies or applicable laws and regulations, without retaliation or retribution.

### 2. Purpose

- 2.1 To encourage directors, executives, employees, and other stakeholders to raise concerns or report any known or suspected misconduct, including fraudulent or illegal activities and violation of the Company’s policies or code of ethics;
- 2.2 To provide safe and confidential channels for whistleblowers to raise concerns and report misconduct without fear of retaliation;
- 2.3 To safeguard whistleblowers against potential retaliation such as unjustified job transfer or relocation, suspension, dismissal, or any other unfair retaliatory actions; and
- 2.4 To establish clear and effective whistleblowing procedures to ensure that all concerns and reports of misconduct are addressed with the highest levels of fairness, integrity, and transparency.

### 3. Definitions

- 3.1 **Misconduct** means any act or omission by directors, executives, or employees which constitutes a violation of the Company’s code of ethics, code of conduct, regulations, or policies.
- 3.2 **Fraud** means any act deliberately committed by an individual to secure unfair or unlawful benefits for oneself or for others, whether directly or indirectly.
- 3.3 **Whistleblower** means the Company’s directors, executives, employees, or other stakeholders who report, in good faith, any suspected misconduct or violation of the Company’s policies, code of ethics, or applicable laws and regulations.
- 3.4 **Whistleblower Investigation Officer** means an individual assigned to investigate the complaint or allegation made by a whistleblower, as well as reporting the outcome of the investigation to the Audit Committee for review and determination of appropriate actions (if any).

### 4. Roles and Responsibilities

#### 4.1 Executives and Supervisors

- 4.1.1 To act as a role model and ensure that all members under their supervision comply with the code of ethics, regulations, and policies of the Company;

- 4.1.2 To promote effective implementation of adequate risk management and internal control systems to prevent misconduct and fraud, as well as identifying and understanding the nature of potential misconduct and fraud that may occur within their business unit;
- 4.1.3 To communicate this Policy to all members under their supervision so as to ensure awareness and understanding of the Policy;
- 4.1.4 To create an appropriate and non-retaliatory environment for whistleblowers to raise concerns and report misconduct; and
- 4.1.5 To immediately report any suspected misconduct or fraud through the reporting channels specified in this Policy.

#### **4.2 Employees**

- 4.2.1 To be aware of and comply with this Policy;
- 4.2.2 To report, in good faith and without fear of retaliation, any actual or suspected misconduct, wrongdoing, or fraud committed by directors, executives, employees, or authorized representatives of the Company; and
- 4.2.3 To facilitate and cooperate with the Company in the investigation of complaints and allegations.

#### **4.3 Chief Executive Officer**

- 4.3.1 To receive complaints jointly with the Head of Internal Audit;
- 4.3.2 To review complaints and assign a relevant person to investigate issues raised in a complaint;
- 4.3.3 To appoint an Investigation Committee as deemed appropriate; and
- 4.3.4 To determine appropriate corrective actions.

#### **4.4 Head of Internal Audit**

- 4.4.1 To receive complaints jointly with the Chief Executive Officer;
- 4.4.2 To forward complaints to the Chief Executive Officer;
- 4.4.3 To forward complaints to the Audit Committee in the event that the Chief Executive Officer is the subject of the complaint;
- 4.4.4 To act as a member of the Investigation Committee when appointed by the Chief Executive Officer;
- 4.4.5 To monitor the status of complaints and report the outcomes thereof to the Chief Executive Officer and respective whistleblower; and
- 4.4.6 To prepare and deliver to the Audit Committee a report summarizing the complaints raised and outcomes of such complaints.

#### **4.5 Audit Committee**

- 4.5.1 To investigate complaints and determine appropriate actions to resolve complaints against the Chief Executive Officer;
- 4.5.2 To review and monitor the outcomes of complaints reported by the Head of Internal Audit; and
- 4.5.3 To express opinions to the Management as deemed appropriate.

## 5. Whistleblowing Channels

5.1 Complaint box

5.2 A sealed letter to the authorized recipient of complaints, namely the Chairman of the Audit Committee or the Chief Executive Officer or the Head of Internal Audit, addressed as follows:

**To:** The Chairman of the Audit Committee or the Chief Executive Officer or the Head of Internal Audit  
No. 9, Soi Ramintra 5, Yaek 26, Anusawari Subdistrict,  
Bang Khen District, Bangkok 10220

5.3 An email to the Corporate Governance Division at CG@assetwise.co.th or an email to the authorized recipient of complaints:

- Chairman of the Audit Committee : kriengkrai.cg@assetwise.co.th
- Chief Executive Officer : kromchet.cg@assetwise.co.th
- Head of Internal Audit : 80ia@assetwise.co.th

Whistleblowers should report relevant facts or demonstrate that they have reasonable grounds to suspect misconduct or violation of the Company's policies, regulations, or business ethics. All whistleblower reports will be kept strictly confidential and can be submitted through more than one channel.

Upon receipt of a complaint or allegation, the Company will conduct an investigation according to the nature of the complaint. In the event that the complaint is serious and complicated, an Investigation Committee will be appointed to carry out an investigation and resolve the complaint.

## 6. Complaints Handling Procedure

6.1 The Chief Executive Officer and Head of Internal Audit are responsible for receiving complaints and discussing appropriate actions in response to the complaints at least once a week.

6.2 In case of a complaint against the Chief Executive Officer, the Head of Internal Audit shall forward such complaint to the Audit Committee for investigation and determination of appropriate actions.

6.3 Any other complaints not involving the Chief Executive Officer shall be addressed and handled by the Chief Executive Officer. Specifically, the Chief Executive Officer shall determine appropriate actions to respond to such complaints and/or appoint a relevant person or agency to investigate the complaints.

6.4 The Investigation Committee shall be appointed by the Chief Executive Officer and shall consist of at least the Internal Audit Unit, the Human Resources Department, and the parties related to the matters raised in a complaint.

6.5 The Investigation Committee or the appointed person/agency shall conduct investigations in a fair manner and compile all relevant facts and evidence, as well as reporting to the Chief Executive Officer the investigation findings, responses to complaints, and corrective actions taken (if any).

6.6 The Head of Internal Audit shall monitor the status of complaints and report the outcomes thereof to the respective whistleblower.

6.7 The Head of Internal Audit shall prepare and deliver to the Audit Committee, on a quarterly basis, a report summarizing the outcomes of complaints.

## 7. Investigation

- 7.1 The Investigation Committee or the appointed person/agency shall investigate complaints and relevant evidence and report the investigation findings, responses to complaints, and corrective actions taken (if any) to the Chief Executive Officer for consideration.
- 7.2 In case of an anonymous complaint in which additional information cannot be sufficiently obtained, the Investigation Committee or the appointed person/agency shall report the investigation findings to the Chief Executive Officer for determination of appropriate actions. If the Chief Executive Officer perceives that actions cannot be taken in response to the complaint, the Chief Executive Officer will close the case, whereupon the Head of Internal Audit shall report such outcome to the Audit Committee.
- 7.3 Upon investigation of a complaint, if the Investigation Committee or the appointed person/agency found that the accused person is not guilty due to unsubstantiated allegations or misunderstanding and has advised the accused person to comply with the code of conduct, the Investigation Committee or the appointed person/agency may close the case without imposing any corrective action by requesting the Chief Executive Officer for approval of the case closure and notifying the Head of Internal Audit of the complaint outcome to be reported to the whistleblower and the Audit Committee.

## 8 Corrective Action

The Company will conduct independent and fair investigations based on relevant evidence and facts that are sufficient to substantiate the allegations reported and will determine appropriate corrective actions in response to complaints. In the event that the alleged wrongdoer is an employee, the Company will pursue disciplinary action and/or legal action (in the case of illegal conduct) against such employee. Alternatively, if the alleged wrongdoer is a third party, the Company will take legal action against such third party.

No disciplinary or other action will be taken against a whistleblower who makes an allegation in good faith even if such allegation is not substantiated upon investigation.

## 8. Deliberate False Reporting

Upon investigation of a complaint or allegation, if it is found that the complaint or allegation has been made with mala fide intentions or is a false accusation, the Company may take disciplinary and legal actions against the employee who made a knowingly false report and take legal action against the third party who made the same.

## 9. Protection of Whistleblowers

- 10.1 The Company will maintain confidentiality of personal information and identity of a whistleblower and person accused of misconduct.
- 10.2 Information will be disclosed only to the extent necessary by taking into consideration the safety of, and risk of retaliation to, a whistleblower or any other person implicated in a complaint or allegation.
- 10.3 Appropriate and fair procedures will be adopted to remedy the harm caused to any person affected by a retaliatory action.

- 10.4 Any persons who believe that they may be subjected to retaliation as a result of whistleblowing or cooperating in an investigation, may request the Company to establish appropriate protection measures. Alternatively, if the Company detects cases that present a significant risk of retaliation, the Company may implement protection measures without their request.
- 10.5 The Company will not tolerate any unjustified actions taken against whistleblowers or persons who have cooperated in an investigation, including but not limited to unjustified reassignment to another position or office, modification of duties, suspension, threat, harassment, or dismissal.

#### 10. Review of the Whistleblowing Policy

This Policy will be reviewed on an annual basis to ensure that it is relevant and adequate and to identify improvements or updates as necessary towards its continued effectiveness.

**Notified on this 12<sup>th</sup> day of December 2024**



(Mr. Sarawut Charuchinda)

Chairman of the Board

AssetWise Public Company Limited