

# Anti-Corruption Performance Report 2024





# Highlights 2024



0% of

corruption complaints



0% of

corruption cases involving business partners



100% of

business partners were informed and assessed for compliance with the anti-corruption policy.



Launched the "Nong Mee Suk" mascot

to communicate and promote good corporate governance and anti-corruption efforts.



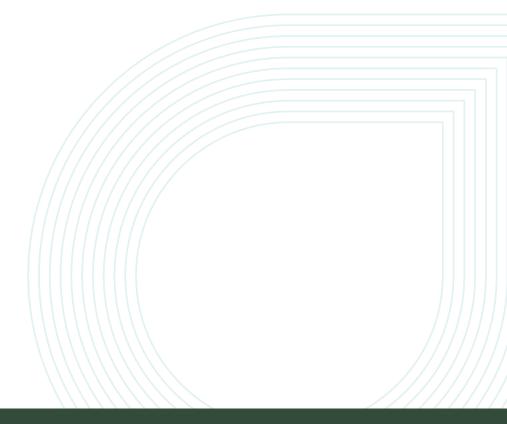
Implemented a real-time online system

for executives and employees to report conflicts of interest.



Established an Ethics Hotline

to provide consultation regarding the anti-corruption policy.





# Our Pride



Received a perfect score of 5 in the Anti-Corruption category from the FTSE Russell ESG Scores 2024 assessment.



Ranked in the Top Quartile of listed companies with a market capitalization ≥ 10,000 million baht, with a 5-star rating or "Excellent" score in the 2024 Corporate Governance Assessment by the Thai Institute of Directors (IOD).



Certified as a member of

the Thailand Private Sector Collective Action Coalition Against Corruption (CAC).



#### Introduction

Corruption is a significant obstacle that affects the economic and social development of the country. Consequently, Pruksa Holding Public Company Limited (PSH) is determined and committed to conducting business according to the principles of good corporate governance, with integrity, transparency, fairness, and responsibility towards the public. This commitment aims to maintain sustainable benefits for shareholders and build confidence among investors, as well as to extend the concept of corruption prevention to external stakeholders, fostering a society free from corruption.

This report outlines PSH's framework, practices, and performance in preventing and monitoring corruption, which has earned PSH recognition as an organization with good corporate governance and concrete promotion of anti-corruption. It covers the operations of subsidiaries within its core business groups: Real Estate, led by Pruksa Real Estate Public Company Limited, and Healthcare, led by Vimut Hospital Holding Company Limited. This report is prepared in accordance with the reporting guidelines of the United Nations Global Compact, which designates anti-corruption as one of the ten universal principles that the United Nations emphasizes and encourages organizations worldwide to implement concretely.



# **Anti-Corruption Framework**

Corporate Governance

- Governance Structure
- Anti-Corruption Policy and Practices
- Risk Assessment

**Building Corporate Culture** 

- A Role Model Leader
- Promoting Diversity and Creativity
- Recognition and Appropriate Compensation
- **Effective Communication**

Business Partners' Practices

Whistleblowing Channels

- **Procurement Process**
- Communication with Business Partners to Adhere to Policies
- Due Diligence Covering Corruption

Whistleblowing Policy

# 3. Monitoring and Assessing

Monitoring and Assessment Process

 Handling Corruption Cases, Performance Evaluation and Reporting to the Board of Directors



# 1. Commitment and Policy

To conduct business in accordance with the determination to oppose all forms of corruption, adhering to the commitment of "Zero Tolerance for Corruption in All Forms", PSH has established a corporate governance structure that clearly separates the roles and responsibilities of each division. This separation ensures proper verification and balance of power. It also defined anti-corruption policy for all employees to adhere to, resulting in work processes throughout the organization that are honest, transparent, and fair, in order to achieve the organizational goals and strategies.

#### Corporate Goals and Strategies

In 2024, PSH continues to focus on conducting business to achieve the goals and strategies as defined and published in PSH's annual report and website, as follows:

#### Integration to strengthen core business groups

This includes Real Estate and Healthcare, integrated with other businesses that support the core businesses, such as promoting PSH's e-commerce business, investing in Property Technology and Health Technology, and Sustainable Technology in Thai and international startups such as Singapore, Malaysia, Australia, and Germany. This is to promote collaboration within the group to deliver sustainable returns and enhance the quality of life for stakeholders.

#### Diversifying growth to ensure profit stability and new value creation

This involves diversifying the investment portfolio to generate stable income, investing in potential businesses to create recurring income, and exploring opportunities for investment in New S-Curve businesses that align with future business trends.

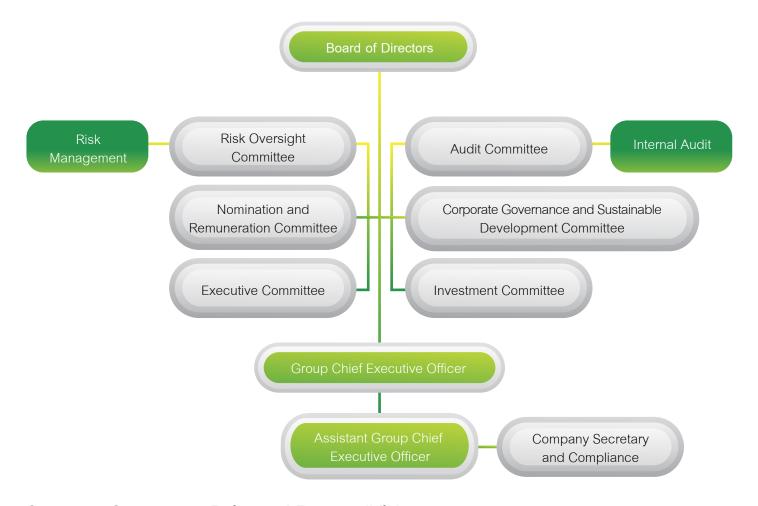
#### Transformation to enhance competitive capabilities

This includes organizational culture transformation by implementing new management tools such as X-teams, developing new capabilities, enhancing corporate image, and setting decarbonization targets for the sustainability of PSH and overall society.



# Governance Structure

Corporate governance is a crucial mechanism to protect the organization from opportunities for corruption. An effective governance structure, under an internal control, audit, and risk management system, enables all stakeholder groups to perform their roles and responsibilities correctly and ensures appropriate checks and balances. Therefore, PSH has established a governance structure that clearly separates the roles and responsibilities between the Board of Directors and Management.



# Corporate Governance Roles and Responsibilities

#### 1. Board of Directors

- 1.1 Considers and approves the anti-corruption policy and other sub-policies related to corporate governance.
- 1.2 Considers and approves the risk management policy and oversees PSH and its subsidiaries to have appropriate risk management processes.
- 1.3 Considers and approves the appointment of the Corporate Governance and Sustainable Development Committee to oversee compliance with corporate governance-related policies, including monitoring investigations, grievances, or non-compliance with regulations, rules, or laws applicable to PSH's business operations.



#### 2. Corporate Governance and Sustainable Development Committee

- 2.1 Formulates the anti-corruption policy and other policies related to corporate governance and submits them to the Board of Directors for approval, including reviewing these policies at least annually.
- 2.2 Defines practices to support the effective implementation of the mentioned policies, including monitoring, supervising, and providing recommendations to management or relevant parties in complying with the policies and practices.
- 2.3 Defines practices related to anti-corruption and provides recommendations to management or relevant parties in anti-corruption efforts.
- 2.4 Monitors and oversees investigations, grievances, or non-compliance with regulations, rules, or laws applicable to PSH's business operations.

#### 3. Company Secretary and Compliance

- 3.1 Develops the annual anti-corruption plan and oversees its implementation, including defining the annual assessment of employees and business partners.
- 3.2 Promotes knowledge, understanding, and compliance with anti-corruption policies and measures, and other corporate governance-related policies among employees and business partners.
- 3.3 Reports the results of anti-corruption operations, including complaints and complaint resolution guidelines, to the Corporate Governance and Sustainable Development Committee on a quarterly basis.



In addition to the governance structure, which serves as a mechanism to separate the roles and responsibilities of everyone within the organization in order to ensure checks and balances, there are also tools to help directors, executives, and employees have consistent practices to define the direction of PSH's business operations based on good corporate governance. These tools are organizational-level policies defined by the Board of Directors.



### Anti-Corruption Policy



Scan to learn more about Anti-Corruption Policy

Anti-Corruption Policy are part of the business code of conduct, demonstrating the intention to conduct business transparently and fairly. They are defined as guidelines for directors, executives, and employeesof PSH and its subsidiaries to oppose all forms of bribery and corruption, including the process for reporting tips or complaints through various channels, such as the Chairman of the Board, the Chairman of the Audit Committee (both of whom are independent directors), and the Group Chief Executive Officer. Measures are in place to protect whistleblowers or complainants and to impose penalties on those who violate anti-corruption policies and measures.

# The Business Code of Conduct



Scan to learn more about The Business Code of Conduct

The business code of conduct aligns with the principles of good corporate governance and is consistent with PSH's vision, mission, values, goals, and strategies. It ensures that business operations are conducted with honesty, integrity, transparency, and social responsibility. It is defined as a code of practice for directors, executives, and employees of PSH and its subsidiaries, regarding both work practices and conduct towards all stakeholder groups. It also includes a process for reporting tips or complaints through various channels, such as the Chairman of the Board, the Chairman of the Audit Committee (both of whom are independent directors), and the Internal Audit Division. Measures are in place to protect whistleblowers or complainants, and penalties are imposed on those who violate the business code of conduct. The business code of conductis reviewed annually.



#### The Business Partner Code of Conduct



Scan to learn more about The Business Partner Code of Conduct

The Business Partner Code of Conduct is established to promote business operations with honesty, integrity, transparency, and social responsibility, which extends not only to directors, executives, and employees of PSH and its subsidiaries but also to business partners. It serves as a code of practice for PSH and its subsidiaries' business partners, including avoiding conflicts of interest, anti-corruption, social and community responsibility, and fostering good relationships. Business partners are responsible for studying, understanding, and signing to acknowledge compliance, as well as communicating and ensuring compliance among their employees and business partners. PSH and its subsidiaries will assess and monitor compliance with the business partner code of conduct as appropriate.



#### Corruption Risk Assessment

When an organization has an effective corporate governance structure, the Board of Directors will establish a risk management division to assess potential risks to the organization and determine risk control guidelines. PSH has a Risk Management Committee and a Risk Management Division to assess various risks that may arise in its core businesses, namely real estate development and healthcare. Corruption risk assessment is therefore important for controlling and preventing corruption in the organization's work processes.

#### Real Estate Group

The real estate business plays a vital role in developing real estate for residential purposes. The operational processes, from construction to after-sales service, often face challenges related to ethics and transparency in coordinating with stakeholders. Therefore, managing relationships with landowners, government agencies, business partners, and neighbouring communities with integrity and transparency is essential to building trust and confidence among customers, business partners, and society.

#### Healthcare Group

The healthcare business plays a crucial role in providing healthcare services to patients. The operational processes, from the procurement of medicines and medical supplies to the follow-up of treatment results, must be conducted within an ethical framework and the highest quality standards to ensure that service recipients are confident in the safety and quality of the medical facility.

1. Risk Identification

2. Risk Analysis

3. Risk Management

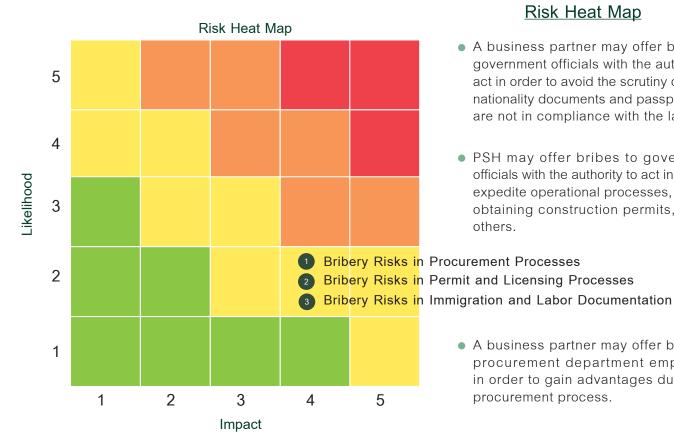
The Risk Management Division has identified internal and external risk factors and analysed corruption risks related to the operations of the core businesses as detailed above. This analysis considers:

- 1. Likelihood: The frequency or probability of a risk event occurring within a specific time frame.
- 2. Impact: The magnitude or severity of damage resulting from the risk, categorized into financial and non-financial impacts.
- 3. Level: To prioritize risks, PSH uses a method to assess the level of corruption risk that aligns with the corruption risk assessment guidelines of the Thai Private Sector Collective Action Coalition Against Corruption (CAC).



| Risk Identification   | Likelihood | Impact | Risk Level | Risk Management Measures  |
|---|------------|--------|------------|---|
| 1. A business partner may offer bribes to government officials with the authority to act, in order to avoid the scrutiny of labour nationality documents and passports that are not in compliance with the law. | Low        | Medium | Medium     | <ul> <li>Establish a clear anti-corruption policy and consistently communicate it to business partners to ensure awareness and compliance.</li> <li>Regularly audit and evaluate the performance of business partners to ensure adherence to legal requirements.</li> </ul>   |
| 2. PSH may offer bribes to government officials with the authority to act, in order to expedite operational processes, such as obtaining construction permits, among others.                                    | Low        | Medium | Medium     | <ul> <li>Establish a clear anti-corruption policy and consistently communicate it to employees to ensure they understand its importance and adhere to it.</li> <li>Define transparent and standardized procedures for interacting with government sectors, including clear timelines, trackability, and no bypassing of approval stages.</li> </ul>   |
| 3. A business partner may offer bribes to PSH's procurement division employees in order to gain advantages during the procurement process.  | Low        | Medium | Medium     | <ul> <li>Establish a clear anti-corruption policy and communicate it regularly to business partners and employees.</li> <li>Establish transparent, fair procurement policies with a system of checks and balances in approval authority between the requesting division and the procurement division. High-value transactions must be submitted for approval to the Procurement Committee and the Executive Committee, respectively.</li> </ul> |





# Risk Heat Map

- A business partner may offer bribes to government officials with the authority to act in order to avoid the scrutiny of labour nationality documents and passports that are not in compliance with the law.
- PSH may offer bribes to government officials with the authority to act in order to expedite operational processes, such as obtaining construction permits, among others.
- A business partner may offer bribes to procurement department employees in order to gain advantages during the

procurement process.

# Corruption Risk Management Mechanisms

To manage the risks identified above, PSH has established mechanisms to control these risks through a Three Lines of Defense organizational structure. This structure delineates the roles and responsibilities of the three levels: First Line (Business Unit), Second Line (Risk Management Division), and Third Line (Internal Audit Division). This ensures that PSH can comprehensively control and manage corruption risks. Furthermore, PSH's operations are governed by a Delegation of Authority policy that adheres to the principles of checks and balances, ensuring operations are conducted with integrity and transparency

PSH has also established a Risk Appetite Statement that does not tolerate corruption risks at any level or in any form, and has defined Key Risk Indicators (KRIs) to monitor corruption risks clearly. These are presented to the Risk Management Committee, the Audit Committee, and the Board of Directors on a quarterly basis.



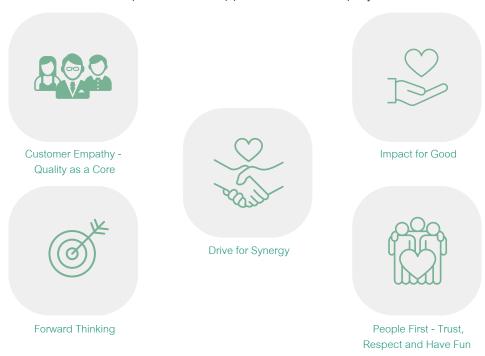
# 2. Implementation

To ensure that the business operations of PSH and its subsidiaries sustainably achieve their stated goals and strategies, based on good corporate governance and free from corruption, in accordance with the organization's commitments and policies, there is a guideline to promote employees' adherence to the Anti-Corruption Policy in a tangible manner. This is to ensure that PSH's business operations are conducted with integrity, transparency, and fairness, genuinely free from all forms of corruption.

#### Building a Corporate Culture

#### "Create a transparent organization, free from corruption"

Corporate culture refers to the system of thoughts, beliefs, and behaviours of employees that are practiced until they become the personality of the organization. It is defined in the form of corporate's core value to guide all employees to adhere to and act in the same direction. Furthermore, corporate values are also one of the key performance indicators in the annual performance appraisal of PSH employees.



Therefore, building a corporate culture is a crucial mechanism that enables PSH employees to conduct themselves in alignment with the organization's values and established policies. The creation of PSH's corporate culture includes:

#### 1. A Role Model Leader

PSH employees strictly adhere to the Anti-Corruption Policy. This is due to the exemplary conduct demonstrated by the executives (Tone at the Top). In addition to adhering to the Anti-Corruption Policy and other relevant policies, PSH executives also oversee the mechanisms that effectively support compliance with these policies.





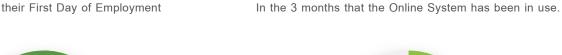
As specified in the Anti-Corruption Policy, executives and employees must disclose any conflicts of interest with the group companies to prevent personal gain and favouritism. This is done through an online system from the first day of employment and whenever there are changes. The system enables executives and employees to report information in real-time, anytime, anywhere, and to update information regularly, ensuring that the data is current. This therefore supports a more efficient internal audit process. The features of the system include:

- 1. Integration with the human resources database of the group, ensuring comprehensive reporting of information by all executives and employees.
- Platform accessibility and ease of use for all employees.
- Support for both Thai and English languages, allowing for future use with subsidiaries or joint ventures ir foreign countries.
- 4. Compatibility with all devices, including computers, laptops, tablets, and mobile phones
- 5. User-friendly interface with a user manual.
- 6. Clear channels for inquiries, with the Company Secretary and Compliance Division as the responsible unit





Executives and Employees Reporting Conflicts of Interest on their First Day of Employment







Executives and Employees Reporting Conflicts of Interest

Executives recognize the importance of internal control systems in mitigating the risk of corruption. In 2024, PSH's Internal Audit Division won the Asian Technology Excellence Awards 2024 for its application of AI technology in auditing. This innovation has increased the efficiency of payment verification for construction projects by processing 10,000 items per month from contractors across 285 projects nationwide, with 100% accuracy compared to manual verification. It has also reduced working hours by 35% and operational costs by 1.7 million baht per year. The AI technology is continuously updated with the latest data every six months.



Furthermore, in 2024, Head of the Internal Audit Division was invited to be a speaker at the seminar, "Capital Market United Against Corruption," of the Thai Private Sector Collective Action Coalition Against Corruption (CAC). This serves as a role model for PSH employees in raising awareness and emphasizing the importance of anti-corruption efforts, and it also demonstrates PSH's concrete stance of zero tolerance towards corruption.







#### 2. Diversity and Creativity

Promoting employee diversity, regardless of gender, race, religion, skills, abilities, etc., fosters a work environment where employees feel trusted, respected, and valued for their contributions to the organization, and it encourages constructive expression.

PSH has organized the Pruksa Innovation Program, which provides opportunities for employees to participate in innovation contests to help develop and improve products, services, and work processes for greater efficiency. Winning innovations will be developed and implemented within the group companies. Supporting employee diversity and creativity fosters a sense of ownership among employees, leading to collaboration in combating corruption through strong policy adherence to protect the organization's interests.





#### 3. Recognition and Appropriate Compensation

Recognizing and providing appropriate compensation for employee performance is another approach to reduce the likelihood of corruption within the organization. When employees receive fair compensation for their work according to their roles and responsibilities and are recognized for outstanding performance, it fosters self-pride and respect for the organization.



In addition to performance appraisals for promotions and salary adjustments, PSH also recognizes and rewards employees with outstanding performance. Examples include the Voice of Customer Award for employees of Pruksa Real Estate Public Company Limited's residential projects who receive compliments from customers, and awards for internal divisions of Vimut Hospital that receive compliments from customers each month. Award-winning divisions are also publicly acknowledged. These initiatives aim to boost morale and provide role models for employees in performing their duties.





#### 4. Effective Communication

Communication is a tool that helps create and disseminate corporate culture to encourage employees to adhere to corporate values and established policies. Effective communication should be consistent and engaging. Therefore, the Company Secretary and Compliance Division created a mascot named "Nong Mee Suk" to symbolize good corporate governance. It is used to communicate and publicize information related to corporate governance and anti-corruption efforts. All employees participated in voting for the name of the mascot.









#### 4.1 New Employee Orientation

PSH provides new employee orientation to prepare employees for their duties. New employees receive general information about PSH, including its history, core value, goals, strategies, and business operations, as well as the various policies they must adhere to. One of these policies is the Anti-Corruption Policy, which outlines the roles and responsibilities of employees in combating all forms of corruption. This ensures that all employees have the same guidelines from their first day of employment. There is also a post-orientation test to assess employee understanding.



#### 4.2 Town Hall

A Town Hall is a meeting between the management and all employees within the organization. It provides an opportunity for PSH's executives to communicate with employees in an informal setting about the organization's progress and the direction of business operations, ensuring alignment with the established goals and strategies. This is all based on principles of honesty, fairness, and transparency for sustainable growth. Therefore, all employees must recognize the importance of and strictly adhere to the or ganization's values and policies. Management will emphasize PSH's commitment to zero tolerance for all forms of corruption.



#### 4.3 CG Site Visit



To ensure that awareness of the importance of anti-corruption and compliance with Anti-Corruption Policy is communicated to all PSH employees, the Company Secretary and Compliance Division organizes the CG Site Visit project. This involves traveling to each residential project of Pruksa Real Estate Public Company Limited to disseminate knowledge about good corporate governance and the importance of adhering to Anti-Corruption Policy.

### 4.4 ESG Day





PSH organizes ESG Day to build knowledge, understanding, and awareness of the importance of sustainable business operations, considering environmental, social, and governance performance in addition to financial performance. This approach enables business growth and sustainable returns. In 2024, ESG Day was held under the theme "Everyone Matters," focusing on respecting human rights and combating corruption within the organization, which are essential components of sustainable business growth.



#### 4.5 CAC Certified Member

PSH has renewed its membership in the Thai Private Sector Collective Action Coalition Against Corruption (CAC). This project was established to provide a platform for private companies in Thailand to participate voluntarily in addressing corruption issues, with support from the government and the National Anti-Corruption Commission (NACC). Members include companies that have declared their intention to oppose corruption and companies that have been certified as having clear and concrete anti-corruption policies and practices to manage corruption risks. PSH has renewed its status as a certified company.





Additionally, in 2024, PSH was invited to organize activities at the CAC awards ceremony under the theme "Business Beyond CAC: Spotlight on Supply Chain - Transparent Supply Chain, Sustainable Thai Business." This was an opportunity for PSH to demonstrate its stance as an anti-corruption organization and to publicize its anti-corruption practices to external parties through activities such as the "Catch the Corruption Wheel" game. This game involved matching words and meanings of different types of corruption. The game -based communication effectively attracted the interest of attendees, resulting in a large number of visitors to the PSH booth.

# 4.6 Abstaining from Giving and Receiving Gifts, Presents, and Monetary Support in All Forms

As stated in the Anti-Corruption Policy, the giving and receiving of gifts, presents, and monetary support in all forms is prohibited. PSH has publicized this No Gift Policy through colourful and eye-catching signs featuring the "Nong Mee Suk" mascot to attract attention. These signs are placed in various locations within the company and its subsidiaries, such as Vimut Hospital, to emphasize employee compliance with the policy. Electronic mail (email) is also used to inform all employees of the policy and toreiterate the importance of adhering to it strictly.





#### 4.7 Communication and Public Relations via Email

The Company Secretary and Compliance Division communicates regularly with all PSH employees via email to provide updates on information related to anti-corruption and to emphasize employee compliance with relevant policies. Corporate email is the most accessible channel to reach all employees and ensures consistent dissemination of information.

# Performance Data

As a result of promoting PSH employees' adherence to the Anti-Corruption Policy through the aforementioned corporate culture initiatives, PSH has achieved the following anti-corruption operating results within the organization in 2024 and over the past three years:

|  | 2024     | 2023      | 2022    | 2021      |
|--|----------|-----------|---------|-----------|
| Number of corruption cases prosecuted by the government (cases)                                  | 0        | 0         | 0       | 0         |
| Amount of political contributions (baht)   | 0        | 0         | 0       | 0         |
| Amount of entertainment expenses (baht)  | 0        | 0         | 0       | 0         |
| Amount of funds supporting external organizations for public benefit and event organizing (baht) | 0        | 1,247,291 | 600,100 | 1,782,000 |
| Amount of charitable donations (baht)  | 215,200* | 0         | 0       | 0         |

\*Donations to Siriraj Foundation, Thairath Foundation, and the Foundation for Slum Child Care



#### **Business Partner Practices**

#### "Build a transparent society, free from corruption"

In addition to PSH employees embracing the Anti-Corruption Policy, this concept and practice are extended to external stakeholders, including PSH's business partners. These partners include vendors, contractors, distributors, any service providers to PSH and its subsidiaries, and business alliances. This is to ensure confidence that PSH will deliver quality products to customers without involving individuals or organizations engaged in corruption, and to foster sustainable business and social cooperation in eliminating corruption.

#### **Procurement Process**

PSH's procurement process adheres to the principles of checks and balances, fairness, and transparency. This includes fair price determination, comparison of three business partners, and e-auctions. All procurement values require joint approval between the requesting division and the procurement division to ensure transparency and mutual oversight. High-value procurements are required to be submitted to the Procurement Committee, the Executive Committee, and the Board of Directors, according to the authorization limits specified in PSH's delegation of authority policy. This ensures that the selection of business partners is based on the maximum benefit to the organization.

#### Declaration of Conflicts of Interest

In addition to PSH employees being required to report conflicts of interest with the group companies, PSH's business partners also have the same obligation. Business partners must report conflicts of interest from the beginning of the procurement process to ensure that PSH's procurement is conducted fairly and transparently, without personal gain or favouritism.

#### Compliance with the Anti-Corruption Policy

PSH's business partners are responsible for studying and understanding anti-corruption practices, as outlined in the Business Partner Code of Conduct, and for signing an acknowledgmentand agreement to comply. They are also responsible for communicating this to their employees and business partners. To facilitate business partners' understanding of the key principles of the Business Partner Code of Conduct, PSH has created a "Business Partners Code of Conduct Practical Guide", using illustrations of the "Nong Mee Suk" mascot to engage business partners to initially review the information before studying the full Business Partner Code of Conduct. The handbook is also available on PSH's website.





Scan to learn more about Business Partners Code of Conduct Practical Guide

Furthermore, PSH requests cooperation from business partners in completing a Business Partner Code of Conduct Assessment Form to monitor their compliance with the Anti-Corruption Policy and the Business Partner Code of Conduct regularly.





#### Communication with Business Partners

PSH consistently communicates the Anti-Corruption Policy and the Business Partner Code of Conduct to business partners and also assesses business partners' understanding of these policies once a year. Additionally, PSH sends letters requesting cooperation from business partners to comply with the Anti-Corruption Policy regarding the No Gift Policy and respect for human rights, including fair and legal employment practices. These policies are also promoted regularly via email to remind business partners of their importance and to ensure compliance.



#### Joint Ventures and Investments

PSH engages in joint ventures with business alliances and makes investments by acquiring common stock in other companies. Prior to these investments, a thorough due diligence process is conducted, covering financial, operational, and legal aspects. In addition to financial objectives, this is to ensure that the companies PSH invests in operate legally, have no history of bribery or corruption in any form, and have strong internal control systems to manage the risk of corruption, resulting that such investments yield both financial returns and long-term business sustainability.

# Performance Data

As a result of extending PSH's Anti-Corruption Policy practices to business partners, the following anti-corruption operating results for business partners have been achieved in 2024 and over the past three years:

|   | 2024 | 2023 | 2022 | 2021 |
|---|------|------|------|------|
| Number of violations of anti-corruption policies and measures (cases) | 0    | 0    | 0    | 0    |
| Amount of fines from penalties (baht)                                 | 0    | 0    | 0    | 0    |



# Whistleblowing and Complaints



Scan to study the Whistleblowing Policy

PSH has a Whistleblowing Policy that applies to PSH and its subsidiaries. It provides guidelines for receiving and managing complaints and reports of violations, and for protecting whistleblowers. This policy supports all employees in adhering to the Anti-Corruption Policy, while also monitoring the organization to ensure it is free from potential corruption. It ensures that any potential corruption cases can be reported through designated channels with the confidence that reporters will not face any adverse consequences. Reported cases will be investigated fairly and transparently, as clearly defined in the policy.

#### Whistleblowing Channels

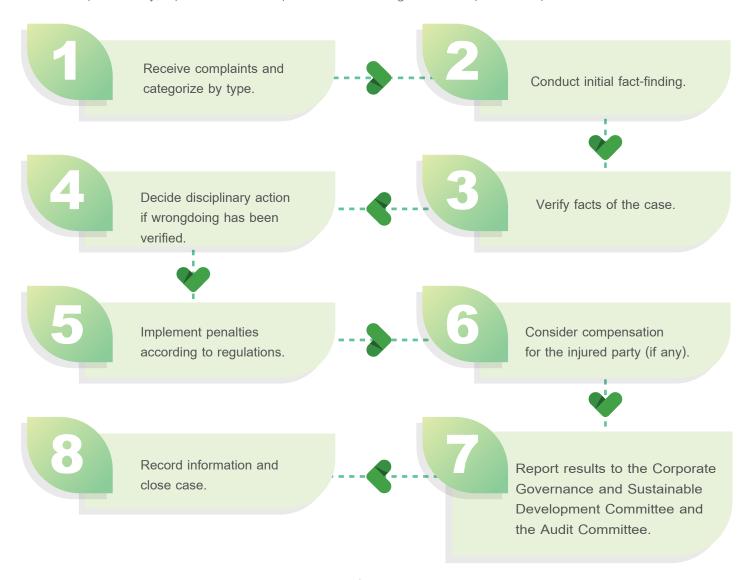
PSH has various channels for reporting complaints and whistleblowing on corruption:

| In person<br>or by mail | <ul> <li>Chairman of the Board, Chairman of the Audit Committee, and Group Chief Executive Officer</li> <li>Trusted supervisors at all levels         Pruksa Holding Public Company Limited, 1177, 24<sup>th</sup> Floor, Pearl Bangkok Building, Phahon Yothin Road, Phaya Thai Sub-district, Phaya Thai District, Bangkok 10400     </li> </ul> |
|-------------------------|---|
| Telephone               | Internal Audit<br>(+66) 0 2080 1739 ext. 48611 and (+66) 08 4875 4784   |
| Line Official ID        | @pruksacg   |
| Email                   | Internal Audit whistleblowing@pruksa.com Company Secretary and Compliance cg@pruksa.com   |
| Website                 | http://www.psh.co.th/th/contact-us-whistleblower-hotline/whistleblowing-channel   |



### Management of Corruption-Related Complaints

In accordance with the Whistleblowing Policy, when the Internal Audit and the Company Secretary and Compliance divisions receive complaints or tips from employees or external individuals, which may involve violations of the Anti-Corruption Policy, a process will be implemented to manage such complaints or tips as follows:



In 2024, there were no complaints or tips that could be classified as corruption, similar to the previous year.

|      | Number of<br>Corruption-Related<br>Complaints | Number of Complaints<br>Investigated and<br>Confirmed | Number of Cases<br>Closed | Channel with the<br>Most Complaints |
|------|---|---|---------------------------|-------------------------------------|
| 2024 | 0   | 0   | 0                         |                                     |
| 2023 | 0   | 0   | 0                         | Website                             |
| 2022 | 2   | 0   | 0                         |                                     |
| 2021 | 8   | 3   | 3                         |                                     |



#### **Ethics Hotline**

In 2024, the Company Secretary and Compliance Division of PSH launched the Ethics Hotline to provide consultation regarding compliance with the Anti-Corruption Policy. It also serves as a channel for disseminating relevant knowledge and news through the Line OA platform, enabling employees to seek advice, inquire, and stay updated on anti-corruption developments at any time. Since its launch a year ago, it has currently gained 130 followers, with an average increase of 10 followers per month.





# 3. Monitoring and Assessing

To ensure the effectiveness of PSH's anti-corruption framework, the Internal Audit and the Company Secretary and Compliance Divisions have established a monitoring and assessment process. This process is used to report operational results and areas for improvement to the Audit Committee (AC) and the Corporate Governance and Sustainable Development Committee (CG&SD), as well as to provide updates on operational performance to the Board of Directors, ensuring that PSH's framework effectively controls and prevents corruption.



The Internal Audit and the Company Secretary and Compliance Divisions will review corruption cases that occur on a quarterly basis to evaluate anti-corruption operations. This will involve considering the number and nature of corruption incidents to assess the effectiveness of policy enforcement, the adequacy of the internal control system, and the efficiency of whistleblowing channels, with the aim of improving and developing operational performance towards zero corruption. This includes monitoring unresolved corruption cases or resolved cases with recurrence of a similar nature. The operational results, along with improvement guidelines, will then be presented to the Audit Committee and the Corporate Governance and Sustainable Development Committee for consideration and recommendations before being reported to the Board of Directors on a quarterly basis.



Pruksa Holding Public Company Limited

Pruksa Holding Public Company Limited, 1177, 24th Floor, Pearl Bangkok Building, Phahon Yothin Road, Phaya Thai Sub-district, Phaya Thai District, Bangkok 10400

**C**1739



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