

Whistleblowing Policy
PrukSA Holding Public Company Limited and
Subsidiaries
(Translation)

Whistleblowing Policy

1. Introduction

Pruksa Holding Public Company Limited (the “Company”) and its subsidiaries are committed to fostering a culture of transparency and integrity among the Company’s directors, executives, and staff at all levels. This commitment extends to adhering to the Company’s policies, rules, and regulations, as well as actively combating all forms of corruption, both directly and indirectly. In order to ensure the participation of stakeholders both within and outside the organization in the corporate governance process, the Company has established channels for complaints, whistleblowing, or reporting any acts that violate laws, rules, regulations, the code of conduct, or the Corporate Governance Policy.

2. Objective

The Whistleblowing Policy (the “**Policy**”) is established for use as the practice for receiving complaints and clues, managing complaints and clues, and protecting complainant, whistleblower, or informant to create confidence that the said persons will not be in trouble and damaged from complaining or whistleblowing.

Therefore, the Company has formulated this Policy with the following objectives.

- 2.1 To ensure that the actions on receipt of complaints and whistleblowing about corruption, misbehavior, the act that violates or complies with laws, rules, regulations, code of conduct, Corporate Governance Policy or in the case of impact from the Company’s business operation or the Company’s personnel have the suitable and efficient procedures according to the Corporate Governance Policy.
- 2.2 To ensure that the directors, executives, and staff who act on behalf of the Company properly, transparently, and verifiably operate the business to conform to laws, the Company’s corporate governance, business ethics, and policies and rules.
- 2.3 To ensure that the person who desires to report the complaints or clues about the work performance of the director, executive, or staff who act on behalf of the Company and are incompatible or doubtful that it will be in conflict with corporate governance and

business ethics for the Company's acknowledgement via the complaints/whistleblowing channels determined by the Company.

2.4 To ensure that the informant of complaints or whistleblower, and any person who honestly collaborates with the Company are appropriately and fairly protected and prevented from persecution as the result of complaint or whistleblowing.

3. Definition

Company	means	Pruksa Holding Public Company Limited and its subsidiaries
The Company's Personnel	means	The Chairman of the Board/Committee, the Company's directors, executives, and staff at every level
Offence	means	Any act or omission of any act by the Company's personnel as a violation of the Charter, the Code of Conduct, policies, rules, and work regulations of the Company as well as laws related to the Company's business operation.
Corruption	means	Any act or abuse of authority exploiting an unjust benefit for oneself and other persons, including giving or receiving the bribe, whether in any form, by improperly offering, promising to give, committing, calling for, giving or receiving money, property, or any other benefits to the government officer, government agency, private agency or those who have duty, whether directly or indirectly, to influence the said person to act or omit its duty performance or to improperly acquire or maintain the business benefits.
Complaints and Whistleblowing	means	Provision of information to the Company about the action believable that the misconduct or suspicious behavior is committed from the illegal practice or set of regulations, non-compliance with the Company's code of conduct, including the acts related to corruption.

Complainant/
Whistleblower means The Company's director, executive, staff, and stakeholder, including insider or third party who are affected or detect the act or event, have reported complaints or whistleblowing via the Company's complaints channels.

4. Scope of the Policy

This Policy is formulated to support the Company's stakeholders to report complaints or whistleblowing or disclose the information showing their impact on the Company's business operation, violation of laws, policies, set of regulations, and business ethics of the Company as follows:

- Violation of the code of conduct and business partner's code of conduct
- Fraud and corruption
- Defraudation, embezzlement of property, stealth, or damage to property
- Misuse of authority to seek personal or other person's benefits
- Destruction of any documentary evidence, distortion, or concealment of information to support the corruption occurrence
- Intentional act that causes damage or disadvantage to the Company
- Impact from the Company's business operations and the act of the Company's personnel
- Act or support for the act that violates laws, sets of regulations, and business ethics, including concealment or assistance to conceal the said act
- Impact from reporting complaints, whistleblowing, or providing information or cooperating to fact-finding or denial of, such as being persecuted, being demoted, being punished, being discharged from the job; or impact causing damage to the whistleblower

5. Protection of Complainant/Whistleblower/Informant and Handling of Confidential Information

The Company has determined a mechanism for protecting the person who cooperates with the Company in corruption, e.g. complaint, whistleblowing, or provision of information, without causing trouble and damage to the complainer/whistleblower as follows:

- 5.1 The Company shall protect the person who cooperates with the Company in complaint, whistleblowing, or provision of information, without causing trouble, harm, or injustice due to cooperation on complaint/whistleblowing/provision of such information.
- 5.2 The Company shall not demote, punish, or give an adverse outcome to the staff or executive who denies corruption even though that act will cause a loss of business opportunity to the Company.
- 5.3 In the case where the complainer/whistleblower/informant detect that they are unsafe or may be damaged, they can request the Company to establish the appropriate protection measures.
- 5.4 To be the protection of the rights of the complainer/whistleblower/informant who honestly performs, the Company shall conceal the information of the complainer/whistleblower/informant and keep the said information confidential, and limit the perception of the person who is responsible for verifying and searching facts. If it is detected that the said information is misused or improperly disclosed, it is considered a violating act, and the Company shall take a disciplinary punishment action.

6. Complaints/Whistleblowing Channels

A person who has detected any suspicious event that may fall in the scope of corruption, misbehavior, or act that violates or does not comply with laws, rules, regulations, Code of Conduct, Corporate Governance Policy, or in the case of impact from corruption of the Company's business operation or the Company's personnel, or impact from denial of corruption, can report complaint/whistleblowing. The said person can choose to disclose or not disclose his/her identity. However, the person who has detected the event must notify the detail which is fact, or notify the clear and adequate evidence that shows a reasonable ground to be believable that there are corruptive acts or impact from denial of corruption via any of the following channels.

- The Chairman of the Board of Directors of the Company, the Chairman of the Audit Committee, and the Group Chief Executive Officer
- Superior trusted by him/her at every level

- Website : www.psh.co.th or www.pruksa.com
- E-mail : cg@pruksa.com
- Line Official ID : @pruksacg
- Telephone : 0 2080 1739 Ext. 48611 and 08 4875 4784

Note: The Company shall verify the complaints by considering the reliable facts. However, the whistleblower or complaint reporter realizes that the dishonest reporting or the reporting in the manner of non-disclosure of that name may be the Company's limitation of fact investigation.

7. Verification and Action Process

7.1 When the Company has received complaints reporting/whistleblowing, it will collect information, classify and verify the primary information, and consider screening to forward the information to the related parties to take action under the following rules.

- (1) In the case of complaints/clues regarding corruptive practice, misbehaviour, violating act, or non-compliance with laws, rules, regulations, code of conduct, Corporate Governance Policy, or in the case of impact from corruption of the Company's business operation or the Company's personnel, or impact from denial of corruption, the Company shall propose the information to the Complaints Consideration Committee to consider taking action.
- (2) In the case of complaints regarding products/service works, the Company shall notify the information to the related work units and Contact Center to take action under the Customer Service Complaints System.

The officer/working group who are responsible for receiving complaint issues shall monthly gather and summarize the complaints report to the Complaints Consideration Committee, and quarterly report to the Corporate Governance and Sustainable Development Committee, and the Audit Committee and/or the Executive Committee.

7.2 After the Complaints Consideration Committee has considered information under Clause 7.1 (1), and

- (1) it deems that the information remains inadequate, it may assign the reliable person or work unit, or appoint the working group as appropriate to verify and gather primary facts until it deems that the information is adequate.

(2) it deems that the information is explicit or adequate, the Fact Enquiry Committee shall be appointed to perform the duty of fact investigation.

7.3 The Fact Enquiry Committee reports and summarizes the Enquiry results, and proposes the management guidelines to the Disciplinary Committee to consider rendering disciplinary decisions or taking action as appropriate.

7.4 The Disciplinary Committee reports the results to the Executive Committee, the Corporate Governance and Sustainable Development Committee, the Risk Oversight Committee, the Audit Committee, and/or the Board of Directors of the Company as appropriate.

8. Penalty

A person who wilfully or negligently breaches this rule as well as has a behavior indicating that it is persecution, threat to make a disciplinary punishment or unlawful discrimination as the result of the complaints/whistleblowing/provision of information to the complainer/whistleblower or person who involves with the proceedings under this rule shall be deemed that such person has violated discipline and shall be responsible for damage arising to the Company and those who have been affected from the said act, as well as may be liable under the related laws accordingly.

**Approved by the Corporate Governance
and Sustainable Development Committee**

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(Dr. Anusorn Sangnimnuan)

Chairman of the Corporate Governance and
Sustainable Development Committee

18 January 2024

Approved by the Board of Directors

_____ - Signed _____

(Dr. Prasarn Trairatvorakul)

Chairman of the Board of Directors

18 January 2024