Document	Whistleblowing Policy
Document No.	PROUD/LC/POLICY006
Effective Date	1 January 2021

Whistleblowing Policy

Proud Real Estate Public Company Limited and its subsidiaries (the "Company") are committed to conducting business with transparency, integrity, fairness, and social responsibility. The Company recognises the importance of preventing fraud, corruption, misconduct, and violations of the Code of Conduct or other relevant regulations, as such conduct may affect the Company's decision-making and business operations. The Company has therefore established whistleblowing channels and measures to protect whistleblowers and persons who cooperate in fact-finding investigations.

Purpose

This Whistleblowing Policy has been established to support directors, executives, employees of the Company, and all stakeholder groups in submitting complaints or whistleblowing reports (Whistle Blowing) concerning misconduct, fraud, corruption, violations of laws or the Company's rules and regulations, or breaches of the Company's Code of Conduct. The Company provides secure and confidential channels for receiving complaints and whistleblowing reports so that persons who provide information can report their concerns with confidence. The Company shall protect complainants and whistleblowers from intimidation, threats, changes in position, changes in duties, changes in workplace, suspension, dismissal, or any other unfair treatment. The Policy also ensures that opinions, suggestions, concerns, or complaints are handled through clear and appropriate processes that are effective, fair, honest, and transparent.

Definitions

1. **"Whistleblower"** means directors, executives, employees of the Company, and stakeholders from all groups, whether they are internal or external to the Company.
2. **"Whistleblowing"** means reporting information to the Company concerning misconduct or suspected fraud, improper conduct, or violations of the Code of Conduct or other relevant regulations.

Roles and Responsibilities

1. **The Audit Committee** is responsible for considering the facts and determining appropriate actions in relation to complaints involving the Chief Executive Officer. The Audit Committee shall also acknowledge and monitor the progress of complaint investigations as reported by the Internal Audit function.
2. **Internal Audit** is responsible for examining and reviewing operations to ensure compliance with this Policy, operational guidelines, delegated authority, work procedures, and applicable laws.

Internal audit shall also assess the adequacy of the internal control system and report the results to the Audit Committee.

3. **The Chief Executive Officer** is responsible for supervising and ensuring the effective implementation of this Whistleblowing Policy, considering complaints, and assigning relevant persons to conduct fact-finding investigation.

4. **Executives** are responsible for acting as good role models and supervising and encouraging employees under their responsibility to comply with the Company's Code of Conduct, regulations, rules, and policies. Executives shall also promote appropriate risk management and internal control to prevent misconduct and fraud within their areas of responsibility, raise awareness of the nature of misconduct and fraud that may occur within their departments, communicate this Policy to employees under their supervision, foster an appropriate environment that encourages confidence in whistleblowing and complaint reporting, and ensure that any misconduct or fraud identified is reported through the designated channels without delay.

5. **Employees** are responsible for understanding and strictly complying with this Whistleblowing Policy. Employees shall report any complaint when they witness, become aware of, or suspect fraud, regardless of whether any damage has occurred. Where directors, executives, employees, or any person acting on behalf of the Company engage in misconduct and/or commit fraud against the Company involving any individual, private-sector organisation, or government agency, employees shall cooperate with and provide assistance to the relevant departments in the investigation of such complaints and whistleblowing reports.

Procedures for Reviewing Complaints and Whistleblowing Reports

1. Upon receiving a whistleblowing report or complaint through any of the designated reporting channels referred to above, the recipient shall acknowledge receipt to the whistleblower, where the whistleblower has disclosed their identity. The recipient shall also collect the relevant facts and forward the matter to the Human Resources Department and the Legal Department for further fact-finding.

   The Human Resources Department and the Legal Department shall be responsible for conducting fact-finding investigations, assessing and screening the information received, considering the potential impacts, and determining the appropriate course of action for each case. The results of the investigation into the whistleblowing report or complaint shall be reported to the Chief Executive Officer and the Audit Committee for further consideration.

Fact-finding Investigation

The investigation shall commence as soon as practicable, taking into account the seriousness of the allegation or complaint. The investigation shall be conducted with due care to avoid affecting the quality and integrity of the investigation. The preliminary investigation shall seek to establish conclusions within an appropriate timeframe and shall be conducted in accordance with the prescribed procedures.

Protection Measures for Whistleblowers and Complainants

The Company has established protection measures for whistleblowers and complainants to prevent intimidation, threats, or the destruction of witnesses or evidence. These measures also protect complainants and persons who cooperate in fact-finding investigations in accordance with the following principles:

1. Whistleblowers, complainants, and persons who cooperate in fact-finding investigations may choose not to disclose their identity if they believe that disclosure may place them at risk or cause any harm. However, where the whistleblower chooses to disclose their identity, the Company will be able to provide updates on the progress of the matter, clarify the facts, or mitigate any damage more conveniently and promptly.
2. Information relating to the Company shall be treated as confidential and disclosed only to the extent necessary, taking into account the safety of and potential harm to the whistleblower or complainant, the source of the information, and the persons concerned. All persons responsible at every stage of the process shall maintain the strictest confidentiality of the information received and shall not disclose it to any unauthorised person. Any breach of confidentiality shall constitute a disciplinary offence.
3. Where a complainant believes that they may be at risk or may suffer hardship or damage, they may request the Company to implement appropriate protective measures. The Company may also determine appropriate protection measures without such a request if it considers that there is a likelihood of harm or a threat to the complainant's safety.
4. Any employee who treats another person unfairly, discriminates against another person, or causes damage to another person without legitimate grounds because that person has submitted a complaint or whistleblowing report, or who initiates legal proceedings against that person on such grounds, shall be deemed to have committed a disciplinary offence and shall be subject to disciplinary action. Where such conduct also constitutes an offence under applicable law, the offender may also be subject to legal penalties.
5. Any person who suffers hardship or damage shall receive appropriate and fair relief through suitable measures or procedures.

6. Where a whistleblower, complainant, or person who cooperates in fact-finding investigations reports a concern or raises a question in good faith, the Company shall not use such action as grounds for taking any action that adversely affects that employee's employment, whether through transfer, demotion, dismissal, reduction of employment benefits, or any other form of retaliation. No person shall retaliate against a whistleblower, complainant, or person who cooperates in fact-finding investigations. Any retaliatory action against a whistleblower, complainant, or person who cooperates in fact-finding investigations for reporting concerns or suspicions of fraud shall be considered unethical conduct and may result in disciplinary action in accordance with the Company's Human Resource Management Regulations.

Malicious or Bad-Faith Whistleblowing or Complaints

Where an investigation finds that a complaint or whistleblowing report has been made maliciously, with the intention of causing harm, or by providing false information, the Company shall, in the case of an employee, consider taking disciplinary action and may also pursue legal action where such conduct constitutes a violation of the law.

Where a complainant or whistleblower acting in bad faith is an external party, the Company may consider taking legal action as appropriate.

Policy Review

The Company shall regularly review and update this Whistleblowing Policy to ensure that it remains appropriate and aligned with the current business environment, supports the prevention of misconduct and corruption, and enables employees and relevant parties to report whistleblowing matters with confidence and through an effective process.

Whistleblowing and Complaint Reporting Channels

The Company has established this Whistleblowing Policy and provides secure communication channels through which employees and all stakeholder groups may seek advice, submit whistleblowing reports, provide suggestions, or file complaints concerning any misconduct that violates laws, regulations, rules, or the Company’s Code of Conduct. The available reporting methods and channels are as follows:

1. **Post**

   Attention: Audit Committee

   Address: Proud Real Estate Public Company Limited

   One City Centre Building, 19th Floor

548 Ploenchit Road, Lumphini Sub-district,

Pathum Wan District, Bangkok 10330

2. E-mail

Attention: Audit Committee

E-mail: cs@proudrealestate.co.th

3. **Company's website**: https://www.proudrealestate.co.th/

Penalties

All employees and executives shall strictly comply with this Policy. Any person who violates this Policy, neglects to comply with it, encourages or supports another person not to comply with it, or intentionally avoids compliance shall be deemed to have committed a disciplinary offence. The Company shall consider disciplinary action in accordance with its regulations. Where such conduct also constitutes a violation of applicable law, the Company shall take further legal action in accordance with the relevant laws. Where a person is found to have committed any of the above acts, the following actions shall apply:

1. Where the offender is an employee of the Company, they shall be subject to disciplinary action in accordance with the Company's regulations.
2. Where such conduct also constitutes a violation of any applicable law, the offender may also be subject to the penalties prescribed by that law.

Document	Whistleblowing Policy
Document No.	PROUD/LC/POLICY006
Effective Date	1 January 2021

Issued on 1 January 2021

Purit

(Mr. Pumipat Sinacharoen)

Chief Executive Officer

Proud Real Estate Public Company Limited