

Whistleblowing Policy

Siam Global House Public Co., Ltd. operates under the principles of good corporate governance and business ethics. The company has established a Whistleblowing policy for reporting misconduct and complaints to uphold these standards. This policy provides a channel for employees and stakeholders to report actions violating laws, regulations, the code of conduct, or business ethics. It also addresses behaviors that may suggest corporate misconduct, fraud, corruption, or personal misconduct within the company. Additionally, the policy ensures protection and fairness for whistleblowers, information providers, and other relevant individuals, with appropriate measures taken to address any reported issues.

1. Objective

- 1.1 To ensure that handling of reports of misconduct and complaints complies with international standards, and adheres to principles of good corporate governance.
- 1.2 To encourage directors, executives, and employees at all levels to report with integrity any actions that contravene laws, regulations, codes of conduct, or business ethics, and acts related to bribery and corporate corruption through the channels designated by the company.
- 1.3 To encourage business partners, representatives, and other stakeholders to report violations of the anti-corruption policy or any unethical behavior transparently through the channels specified by the company.
- 1.4 To protect whistleblowers, information providers, complainants, and individuals cooperating with the company honestly, and to safeguard them from retaliation arising from appropriate and fair reporting of misconduct and complaints.

2. Definition

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| Company | means | Siam Global House Public Co., Ltd., Subsidiaries, joint ventures, other companies that the company has controlling power over, and business representatives. |
| Personnel | means | Directors, executives, and employees of the company |
| Whistleblower | means | An employee, a business partner, a business ally, a third-party who reports clues to the Company's specified channels |
| The Accused | means | Individuals who are identified as being involved in actions that contravene or are suspected of contravening laws, policies, regulations, business ethics, and codes of conduct. |
| Misconduct | means | An act that is intentionally dishonest or violating, not complying with the laws, regulations of the Company, business ethics, and code of conduct. |
| Fraud | means | A deliberate act of seeking undue benefits for oneself or others that can be divided into 3 categories: corruption, misappropriation, and fraudulent reporting. |

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|----------------------|-------|--|
| Corruption | means | Bribery, including offering, pledging to give benefits, and requesting or receiving favorable conditions between government officials, government agencies, private entities, or individuals with duties—whether directly or indirectly—with the intent to influence such persons to perform or refrain from their duties to secure business advantages or to gain or retain any prohibited business benefits, except as permitted by law, regulations, announcements, rules, local customs, or trade practices. |
| Misappropriation | means | An action leading to the possession of another person’s assets or more persons to whom the assets were entrusted, either to be held or to be used for wrongful abstraction. |
| Fraudulent reporting | means | Improvement of various reports, whether financial, such as financial statements, financial records, or nonfinancial reports to conceal misappropriation of property or improper actions or for the benefit of oneself and/or others and result in incorrect reports of the Company. |

3. Scope of Whistleblowing

Misconduct behaviors may be in accordance with this policy

- 3.1 Behaviors related to intentional acts to seek unlawful benefits for oneself or others; In addition, fraud can be divided into 3 categories: Corruption, Misappropriation and Fraudulent Reporting.
- 3.2 Behaviors related to transaction processes that violate laws, rules, regulations, company regulations, business ethics, and working practices
- 3.3 Behaviors related to human rights violations such as discrimination or harassment, etc.

4. Roles and responsibilities

4.1 Board of Directors

- Determine the policy for whistleblowing and/or other related policies.
- Consent and approval operating procedures and channels for whistleblowing, including protection measures for whistleblowers and informants.

4.2 Executives

- Provide operational procedures and channels for whistleblowing, including protection measures for whistleblowers and informants of information appropriately and presented to the Board for approval.
- Arrange to have a structure responsible for whistleblowing and investigating.
- Arrange the communication with understanding for employees, business partners, business allies, and outsiders to acknowledge policies, procedures, and whistleblowing channels.

4.3 Investigation Committee

- Responsible for conducting fact-finding, processing, and filtering received information to assess impacts, as well as determining appropriate steps and methods for handling each case; and report the findings of complaint investigations or reports of wrongdoing to the audit committee and/or management committee to provide opinions.



- Prepare a summary report of the investigation results regarding reported misconduct for whistleblowers and relevant parties to be informed as necessary and appropriate.

4.4 Recipients

- Collect facts, verify information and evidence of whistleblowing
- Submit whistleblowing that has been approved to the investigator
- Record progress and collecting data

5. Whistleblowing and Complaints Channels

| Channels | Details | Recipients |
|--------------------------|---|----------------------------|
| E-mail | secretary@globalhouse.co.th | Company Secretary |
| Website | https://globalhousenews.com/whistleblower-with-complaints/ | Company Secretary |
| Complaint & Feedback Box | Receive complaints and suggestions for the branch | Human Resources Department |
| Post Mail | Audit Office Siam Global House Public Company Limited 232 Moo 19, Rob Muang, Muang, Roi Et, Thailand 45000 | Audit Office |

6. Procedures for handling whistleblowing reports

6.1 Receiving and Collecting Facts

Upon receiving a report of misconduct or complaint, the designated recipient shall notify the whistleblower through various channels (In case the whistleblower reveals their identity) and collect relevant facts, sending the matter to the investigation committee for further inquiry. The investigation process shall be completed within 45 days since the date of receiving the whistleblowing report or complaint

6.2 Verification of facts and actions taken against the accused.

The investigation committee is responsible for conducting fact-finding, processing, and filtering received information to assess impacts, and determines appropriate steps and methods for handling each case. They must report the findings of the investigation of reported misconduct or complaints to the audit committee and/or management committee to provide insights. The investigation and conclusion of facts must be completed within 45 days from the date of receiving the complaint or report of wrongdoing.

The audit committee reviews and summarizes the results of actions taken regarding complaints or reports of wrongdoing against the company's committee to consider penalties.

In this regard, actions following various fact-finding processes have been established to suspend violations or non-compliance with business ethics and mitigate damage to affected parties, taken into account the overall severity of the harm. This includes establishing necessary measures to protect complainants or whistleblowers and those who assist in fact-finding, who may face repercussions.

6.3 Summary and Reporting

The investigation committee reports the results of the consideration to the complainant or whistleblower (in cases where they reveal their identity) within 7 working days since the date of summarizing the results.

7. Measure to protect whistleblowers

- 7.1 Whistleblowers or complainants have the option to not disclose their identity if they believe it may affect their job duties or if they deem disclosure unsafe. In cases where the identity is disclosed to the company, the company will provide progress updates and disclose factual findings to the whistleblower.
- 7.2 The company will keep related information confidential, considering the safety and potential harm to whistleblowers. Protective measures have been established to safeguard whistleblowers or complainants and/or information providers and/or those who assist in fact-finding, ensuring protection from unfair practices such as job position changes, job nature alterations, workplace relocation, suspension, intimidation, work disruption, termination, resulting from the act of whistleblowing.

8. Disciplinary Action

- 8.1 If the accused is found to do misconduct, they shall be subject to disciplinary action in accordance with the company's regulations. Additionally, if the misconduct constitutes a violation of the law, the accused may face legal punishment. Disciplinary action following the company's regulations and/or decisions made by the company's committee shall be considered final.
- 8.2 Personnel of the company who treat others unfairly, choose inappropriate practices, or cause harm to others as motivated by complaints, reports, or grievances are considered disciplinary offenses and may be subject to legal penalties for violating the law.

9. Communication

- 9.1 The company will arrange communication and dissemination of policies regarding reporting misconduct and complaints, including channels for reporting to company personnel through internal communication channels (Share Point) and the company's website www.globalhouse.co.th
- 9.2 The company will communicate and disseminate its policies on receiving complaints and reporting misconduct to stakeholders through various channels such as the company's website and annual reports (56-1 One Report).

10. Policy Review

The Company will consider and review this whistleblowing policy as appropriate or at least every 2 years.

Announced on February 9th, 2024.

(Mr. Witoon Suriyawanakul)
Chief Executive Officer
Siam Global House Public Co., Ltd.