



IFS Capital (Thailand)  
Public Company Limited

## IFS CAPITAL (THAILAND) PCL Whistleblowing Policy and Procedures

### Purpose of the Whistleblower Procedures

The Whistleblowing Policy and Procedures (the “**Policy**”) establish a procedure for all employees of IFS Capital (Thailand) PCL (the “**Company**”) and stakeholders alike to submit complaints or concerns (a “**Complaint**”) relating to any potential unethical or unlawful behavior, financial improprieties or to report perceived violations of law or the Company’s policy.

The aim of this policy is to ensure that all employees and stakeholders alike are confident that they can raise any matters causing them concern, with the knowledge that it would be taken seriously, be dealt with in the strictest confidence, and be acted upon without any fear of possible reprisals. Employees and stakeholders alike are therefore encouraged to submit their Complaints.

This policy applies to all employees of the Company including Directors, Executives permanent, contract and temporary employees and stakeholders alike (“**Complainant (s)**”).

### Confidentiality

The Company will take all reasonable steps to safeguard the identity of the whistleblower.

All Complaints shall be treated as confidential. All investigations will be conducted in a confidential manner, so that information will be disclosed only as needed to facilitate the investigation or otherwise as required by law.

Any whistleblower who makes a Complaint in good faith should not have fear of reprisals.

### Procedures

The details of how a Complaint can be made and how it will be handled are set forth below.

#### (A) Submission of a Complaint

- (i) Complainants are free to submit their Complaints confidentially in person directly to the Chairman of the Audit Committee via an e-mail: [whistleblowing@ifscapthai.com](mailto:whistleblowing@ifscapthai.com) or by a postal mail marked “**Private & Confidential**” addressed to:



**Chairman of the Audit Committee  
IFS Capital (Thailand) Public Company Limited  
1168/55, 20<sup>th</sup> Floor, Lumpini Tower, Rama 4 Road,  
Tungmahamek, Sathorn, Bangkok 10120**

- (ii) Such complaints shall include a complaint relevant to financial improprieties (such as questionable accounting, internal accounting controls or auditing matters).

(B) Action To be Taken

- (i) Before the person who receives the Complaint decides to proceed with the matter under this Whistleblowing Policy and Procedures, he would reconfirm with the Complainant that his identity is not to be disclosed.
- (ii) Upon confirmation of the Complainant, the person who received the Complaint shall take down the statement from the Complainant. To safeguard the confidentiality of the identity of the Complainant, the statement shall remain in the custody of the person who received the Complaint.
- (iii) In the event where an anonymous Complaint is received, the investigation of the Complaint will be carried out based on the information or documentation provided by the Complainant. In cases where there is insufficient information or documentation provided, it may not be possible to proceed with or properly conduct an investigation.
- (iv) The Chairman of the Audit Committee who received will consider the complaint by himself and / or appoint an investigation committee which is an independent party to take the following actions:
  - (a) Review and submit the Complaint to the Investigation Committee
  - (b) Oversee the progress of the conduct of the investigation by the Investigation Committee
  - (c) Determine a plan of action
  - (d) Summarize and report the investigation results
- (v) Once the investigation and evaluation of the Complaint has been completed, the Investigation Committee shall report to the Chairman of the Audit Committee on the results of its findings, the recommended plan of action (where appropriate) and the recommended disciplinary or remedial action, if any.
- (vi) The Chairman of the Audit Committee will propose the complaint, the results of its findings, the recommended plan of action (where appropriate) and the recommended disciplinary or remedial action, if any, to the Board for acknowledgement or approval.
- (vii) The action determined by the Chairman of the Audit Committee to be appropriate under the circumstance shall, where deems necessary by the Chairman of the Audit Committee, be brought to the Board for authorization or implementation.



- (viii) The Complainant who made the report will be kept informed of the final outcome of the matter.
- (ix) Reasonable and necessary steps will also be taken to improve the processes (if necessary) to prevent any improper conduct from occurring in future or to prevent any further violations of the Company's policy.

The Board of Directors, management and employees must understand and follow this Whistleblowing Policy and Procedures in order to achieve the Company's goals and objectives which effective since 18<sup>th</sup> February 2021 onwards.

A handwritten signature in blue ink, appearing to read 'R. Sim'.

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(Mr. Randy Sim Cheng Leong)  
Chairman of the Board of Directors

This Whistleblowing Policy and Procedures has been approved by the Board of Directors' Meeting No. 1/2021 held on 18<sup>th</sup> February 2021 and is superseded the previous version dated 7<sup>th</sup> May 2019.



## ACKNOWLEDGEMENT AND COMMITMENT

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I acknowledge receipt of the Anti-Corruption Policy, the Whistleblowing Policy and Procedures, and the Anti-Corruption Manual.

I have read and understand the code, and I agree to abide by its rules herein.

I understand that the guidelines contained in this document are merely a general overview of some of the Company's policies and procedures and that these policies and procedures, as well as any other policies and procedures which may be adopted by the Company, are subject to modification, discontinuation or change without notice.

ข้าพเจ้าได้อ่านและเข้าใจนโยบายต่อต้านการคอร์รัปชัน นโยบายการแจ้งการกระทำผิดและให้ความคุ้มครองผู้ร้องเรียน และคู่มือมาตรการต่อต้านการคอร์รัปชัน และข้าพเจ้ายอมรับเพื่อยึดถือปฏิบัติตามข้อบัญญัตินี้

ข้าพเจ้าเข้าใจว่าแนวทางที่ได้บัญญัติไว้ในเอกสารฉบับนี้เป็นเพียงการอธิบายโดยสรุปถึงนโยบายและระเบียบของบริษัทเท่านั้น ทั้งนี้ระเบียบและนโยบายดังกล่าวที่จะได้บัญญัติขึ้นอาจมีการปรับปรุง ยกเลิก หรือแก้ไข โดยไม่ต้องประกาศแจ้ง

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