

Whistle-blowing Policy

Pro Inside Public Company Limited

This Whistleblower Policy is intended to support and encourage the Company's Personnel at every level, shareholders, customers, business partners, or other stakeholders doing business with the Company, to be able to report to the Company acts relating to violations of the law, government regulations, breaches of the code of conduct, ethical misconduct, embezzlement, or fraud by an employee or other person — whether an act that actually occurred or a suspicious event — that has caused, or may cause, monetary or non-monetary damage to the Company. This is intended to promote a "Speak Up" culture, which is a key mechanism for preventing wrongdoing, fraud, and corruption, and which results in the Company's business operations being credible, correct, transparent, and fair.

Objectives

To prevent risk and damage that may occur to the Company, as well as to stakeholders, from acts that violate the law or breach the Company's code of business conduct, or from the misconduct of the Company's Personnel, and to ensure that handling of complaints or whistleblowing tips follows a clear structure in accordance with the principles of good corporate governance.

Application

This policy applies to all personnel of Pro Inside Public Company Limited, namely directors, executives, employees, and workers, as well as all relevant stakeholders, including but not limited to business partners, customers, partners, various advisors, shareholders, and any other person doing business with, or having a business relationship with, the Company.

Scope of Complaints or Tips

The Company's Personnel at every level, and relevant stakeholders, shareholders, customers, business partners, or other persons doing business with, or having a business relationship with, the Company, must report to a supervisor or report a tip through the designated channel promptly, where there is doubt and/or where conduct giving reasonable grounds for suspicion is discovered, as follows: (1) fraud and corruption; (2) violation of the law, the Company's articles of association or regulations, and the Company's code of business conduct; and (3) conduct constituting a violation of human rights, discrimination, harassment, or an act contrary to good morals or ethics.

Channels for Reporting Tips or Whistleblowing

Reports may be submitted through 3 channels, as follows:

1. By e-mail, to: whistle-blower@proinside.co.th

2. By post, addressed to: the Audit Committee, Pro Inside Public Company Limited, No. 55, A.A. Capital Ratchada Building, 5th Floor, Ratchadapisek Road, Din Daeng, Din Daeng, Bangkok 10400
3. Online, at: <http://www.proinside.co.th/contact/whistleblowing>

Tips or complaints should be reported in polite language, clearly stating the facts or circumstances in a verifiable manner. Consideration of tips or complaints shall be conducted transparently and fairly; every stage shall be under the oversight of the Audit Committee, and any information received by the Audit Committee shall be kept confidential.

Guidelines for Handling Complaints

1. A reporting person should report to the Company any tip discovered or suspected promptly.
2. A whistleblower should provide clear information: the reporter's name, address, telephone number, date and time, the location where the incident occurred, details of the incident, and a telephone number or e-mail address at which they can be contacted, so that the investigating officer can provide updates or ask further questions for the purpose of the fact-finding investigation. The Company shall keep confidential the name, address, or any information that could identify the complainant or the person providing information, and shall retain the complainant's and informant's information confidentially, limiting access to such information only to the person responsible for investigating the complaint, to the extent permitted by law, in order to protect the reporting person's rights. However, the reporting person may choose whether or not to disclose their name, but a reporting person who cannot be contacted may not receive updates on the progress of the fact-finding investigation and the Company's actions.
3. When a tip is reported through a channel the Company has designated, the recipient will confirm receipt of the tip back to the reporting person (where the reporting person has disclosed their identity) within 3 business days, and will report the received complaint to the Audit Committee. The Audit Committee may delegate the appointment of an investigation committee, person, or trusted unit to conduct the fact-finding investigation. The person responsible for the investigation and fact-finding must be independent and have no interest connected with the whistleblower or complainant, or with the matter reported or complained of.
- Where the matter concerns a violation of the law, the Company's regulations, articles of association, or code of conduct, the matter shall be presented, together with an opinion and a proposed correct course of action, to the person with authority to act within the Company for consideration; and in the case of an important matter — such as one that affects the Company's reputation, image, or financial position, conflicts with the Company's business policy, or involves a senior executive, among other things — the matter shall be presented to the Audit Committee or the Board of Directors for consideration.

1. In the process of investigating a matter reported as a tip or complaint, the adequacy of the facts shall be considered, and the Company shall proceed as quickly as possible. A timeframe of 30–60 days has been established for considering and investigating complaints, depending on the detail and complexity of the fact-finding for each matter. Where the whistleblower has disclosed their identity, the Company will inform them of the outcome within 7 business days from the date the conclusion is reached.
2. Where the fact-finding investigation finds that the available information or evidence gives reasonable grounds to believe that the accused actually committed the alleged act, the Company shall give the accused the right to be informed of the allegation and the right to defend themselves, by seeking additional information or evidence demonstrating that they were not involved in the alleged act. Management, the Audit Committee, or the Board of Directors shall consider action against the wrongdoer, mitigate the damage, and provide fairness to the injured party, and the outcome of such consideration shall be reported to the Audit Committee and the Board of Directors.
3. The Company's Personnel must cooperate and provide facts in the investigation process, whether conducted internally or externally. Violation of, or non-compliance with, the Company's policy and practice guidelines shall be considered for disciplinary penalties under the work regulations established by the Company, and the person concerned must be responsible for compensating the Company, or any person affected by such conduct, for the resulting damage; and where such conduct is also unlawful, the Company shall also consider proceeding under the relevant law.
4. Where it is proven that a complaint received was false information, submitted with dishonest intent, distorting facts, defaming another person, or with intent to bully or deliberately cause damage to another person or the Company, the complainant or whistleblower shall be deemed to have breached the Company's code of business conduct, and shall be subject to penalties under the regulations or applicable law.

Whistleblower Protection Measures

1. A whistleblower or person cooperating in a fact-finding investigation is not required to identify themselves, if they believe that disclosing their identity may result in danger or any impact on themselves or those close to them.
2. Any information that could identify the whistleblower or the person cooperating in a fact-finding investigation shall be kept confidential. The Company shall proceed with as much care as necessary for the purpose of fact-finding, giving primary regard to safety and the impact on the whistleblower, the person cooperating in the investigation, and any related persons.

3. A whistleblower and any person who cooperates in an investigation or provides information in good faith will not be subject to disciplinary action, accusation, salary reduction, demotion, or reduction in position, for having genuinely and in good faith provided information to the Company that is not a malicious defamation of another person, and shall be protected from any act that causes them to be affected or unsafe, such as intimidation, harassment, obstruction, interference with work, or any act constituting bullying or unfair treatment.
4. The Company will not demote, penalize, or take any negative action against an employee who refuses to engage in corruption, even where this causes the Company to lose a business opportunity.
5. Where a whistleblower or a person cooperating in an investigation believes they have been intimidated, harassed, obstructed, had their work interfered with, or subjected to bullying or unfair treatment, this should be reported through the above whistleblowing channel. The whistleblower or person cooperating in the investigation may also request that the Company establish any additional appropriate protective measures.

Contact Channel for Inquiries

For inquiries or requests for advice or guidance on compliance with the Whistleblower Policy and anti-corruption measures, contact may be made by e-mail at: whistle-blower@proinside.co.th

Mr. Wisudhi Srisuphan

Chairman of the Board