

## WHISTLEBLOWING POLICY

The Company encourages all Company personnel to implement, in accordance with the good Corporate Governance and Ethical Standards and Code of Business Ethics principles, as well as to ask questions on, any relevant matters or concerns on the Ethical Standards and Code of Business Ethics. Furthermore, any inquiries or complaints can be sent to the Audit Committee, Managing Director, Company Secretary, Human Resources Department or direct supervisor.

The Company shall treat all Company personnel equally, transparently, and give fair judgment in a timely manner. The name of any complainant shall be protected and kept confidential during and after the investigation process.

### 1. Objectives

- 1.1 To encourage Company personnel to operate correctly, transparently, rightfully and accountably in accordance with the principles of good Corporate Governance, Ethical Standards and the Company Code of Business Ethics. Everyone is expected to report in good faith any act contrary to, or suspected to be in violation of, such matters to the Company. The Company shall improve or modify operations to be correct, suitable, transparent, fair and consistent with the Securities and Exchange Act which protects the persons giving information in good faith to the complaint receiver.
- 1.2 To ensure that supervisors and the Human Resources Department of the Company are responsible for managing, providing advice and monitoring that the various actions of staff are performed correctly. Additionally, the complainants shall be protected if they have acted in good faith.

### 2. Channels of notifying suspicions or complaints

- 2.1 In cases of doubt or discovering actions violating the principles of good practice concerning the following matters:
  - Violation of compliance with the principles and practice guidelines of good Corporate Governance Policy
  - Violation of the rules and regulations of the Company
  - Not being treated fairly at work
  - Fraud
- 2.2 Discovery of acts that cause suspicion and have a bad effect on the Company

### 3. Channels of notifying suspicions or complaints for stakeholders

#### 3.1 Mail:

##### **Audit Committee**

Frasers Property (Thailand) Public Company Limited

Suite 1308, 13/1<sup>th</sup> Floor, Sathorn City Tower, 175 South Sathorn Road, Thungmahamek, Sathorn, Bangkok, 10120

#### 3.2 E-mail address:

Audit Committee : FPT.AuditCommittee@frasersproperty.com

#### 3.3 Website: [www.frasersproperty.co.th/en/home](http://www.frasersproperty.co.th/en/home)

### 4. Conditions of accepting notification of suspicions or complaints

4.1 Detail of notifying clues or complaints must be true and adequate for further investigation process.

4.2 Informers or complainants can choose to be anonymous and not disclose their address and contact number if they consider that they may be unsafe or potentially suffer harm. However, if informers or complainants disclose their name, the process of reporting the investigation progress, asking for additional useful information related to the complaints, and reducing the damage can all be done more quickly.

4.3 All received evidence shall be kept confidential and the name of the person notifying suspicions or complaints will not be disclosed without their permission.

4.4 The right of informers or complainants, both Company employees and outsiders, will be protected.

4.5 The period of the complaint process will depend on the complication of the complaint, sufficiency of the evidence, and the explanation of the respondent.

4.6 The person responsible for receiving complaints, being relevant to the investigation process, must keep relevant documents as confidential as possible and disclose only information as needed, with consideration of safety for the complainant or the person coordinating in the investigation.

4.7 The Company shall not accept a fraud complaint in events as follows:

4.7.1 The investigation committee finishes the investigation process and has no new significant evidence.

4.7.2 The respondent was discharged from the Company more than five years before the complaint was made.

4.7.3 Fraud or complaints which have insufficient evidence to undertake the investigation process.

4.7.4 The date on which the fraud happened is more than five years before the date of the complaint and presently cannot find sufficient evidence to undertake any further investigation.

## 5. Relevant persons

5.1	Informers	The person reporting suspicions or complaints
5.2	Complaint receiver	Audit Committee
5.3	Complaint coordinator	The person receiving preliminary information, coordination and collection of the investigation results. (Company Secretary, Human Resources department)
5.4	Person responsible for complaint	Direct supervisor of the respondent or the upper direct supervisor of the respondent's department.
5.5	Person responsible for regulation	Human Resources department
5.6	Managing Director	
5.7	Audit Committee	

## 6. Process of dealing with the matters of complaint

6.1 Registration and submission of matters

6.1.1 The Complaint Coordinator registers the complaint and fixes the date of reporting back any progress with the said matter to the complainant as follows:

- In the event of serious impact on the reputation of the Company, take action as urgently as possible.
- For other cases, take action quickly.
- For general inquiries such as questions about share price, dividend payment, there is no need for registration of these matters. However, the matters shall be submitted to the departments directly responsible to answer questions from inquirers.

6.1.2 The Complaint Coordinator records information from the complainant as follows:

- Complainant's name, except in the case of anonymity
- Complaint date
- Name of the person or cause of complaint
- Other relevant information

6.1.3 After registration of complaint, define the confidentiality level in accordance with the nature of the matter (except for general inquiries) and proceed as follows:

- Submit to the relevant person responsible for that complaint so as to supervise the investigation according to their level of authority.
- Submit a copy of the matter to the Human Resources Department as preliminary information to prepare for providing advice on disciplinary or other actions.
- Submit a copy of the matter to the Managing Director and Audit Committee for acknowledge.

6.2 Gather facts and order

6.2.1 The person responsible for that complaint shall undertake to find facts and advise the relevant person to behave or practice suitably. If a disciplinary action must be imposed, consult with the Human Resources Department so that the punishment is in accord with the Company's punitive measures. If the person responsible for that complaint has no power to order punishment, the matter should be submitted to a higher level, until it reaches the correct level of authority. This may vary case by case. The results of the investigation, the action taken and the punishment for that case must be submitted to the Managing Director through the relevant superiors for acknowledgement or further action.

6.2.2 Regarding a complaint by an anonymous person and inability to find sufficient additional information, the person responsible for complaint shall submit a report on the results of information verification and comments on that complaint to the Managing

Director through the relevant superiors so as to seek guidelines for appropriate action. If the Managing Director considers that it is unfeasible to act on the complaint, that complaint shall be dropped. Furthermore, the person responsible for complaint must submit a copy for the Complaint Coordinator to acknowledge so as to report to the Audit Committee.

6.2.3 If the person responsible for that complaint finds, after investigation, that the respondent is not guilty, or that the matter arises from a misunderstanding, or if advice has already been provided to the respondent or the relevant person to behave appropriately, or if examination reveals that the matter should be closed without any penalty, the person responsible for that complaint shall submit the said matter to their superiors so as to request approval for closing the case, and submit a copy to the Complaint Coordinator to inform the complainant. The Coordinator shall report to the Managing Director and Audit Committee.

### 6.3 Investigation

6.3.1 If the person responsible for that complaint and the Human Resources Department consider that disciplinary action must be imposed, the Human Resources Department shall submit the matter to the Managing Director for further investigation into the facts.

6.3.2 According to Managing Director's orders, the person responsible for that complaint shall be notified of the outcome so as to follow the next steps.

### 6.4 Notifying conclusive results to the complainant, improvements and modifications

6.4.1 The person responsible for that complaint shall follow the orders of the Managing Director, and proceed to recommend appropriate behavior or practice. The Complaint Coordinator shall be informed about the results of the action.

6.4.2 The Complaint Coordinator notifies the complainant of the results and records the results of action on the complaint by informing the Audit Committee on a quarterly basis.

6.4.3 The Complaint Coordinator follows the results of improvements and modifications (if any) and reports to the Managing Director and the Audit Committee for acknowledge.

## **7. Complaint in bad faith**

For Company personnel, if notification of suspicions or complaints proves to have been made in bad faith, disciplinary action shall be imposed. For an outsider who acts and causes damage to the Company, legal proceedings shall be taken against that person.

## **8. Measures to protect the informers or complainants**

8.1 The Company shall keep information and the identity of the informers, complainants and respondents confidential.

8.2 The Company shall disclose information as necessary, taking into account the safety of, or threat to, the informers or relevant persons.

8.3 Any persons suffering harm shall be treated with right and fair procedures.

8.4 In the event that the complainant or other persons cooperating in the investigation consider that they may be unsafe or potentially suffer harm, the complainants or persons cooperating in the investigation can request that the Company adopt appropriate protection measures. The Company may adopt the protection measures without the request of complainants or persons cooperating in the investigation if the situation is considered to be unsafe.

8.5 The Company shall not do anything which is unfair to the informers or the complainants, including changing their job or office, suspension from work, intimidation, interference with work, dismissal or any other actions that appear to be unfair treatment of the informers, complainants or persons cooperating in the investigation.

## **9. Punishment**

Since the Anti-Corruption Policy and Measures form part of work discipline, directors, management and personnel of the company who violate them will be subject to investigation and disciplinary action under TICON's regulations, as well as those of the Public Limited Companies Act, Securities and Exchange Act and the law.