



WHISTLEBLOWING POLICY

of

SISB PUBLIC COMPANY LIMITED

Whistleblowing Policy

1. Objectives

SISB Public Company Limited, its subsidiaries and all schools under SISB's Management "**the Company**" is committed to operating its business with integrity, transparency, morality and in accordance with good corporate governance principles including anti-corruption in any form, the Company has set up a whistleblowing policy or a complaint as a "policy" to support and as a working channel for directors, executives, employees, as well as stakeholders. All groups of the company can report complaints in good faith, in case of seeing any action or suspected of fraudulent or illegal acts, violations of the rules, regulations, policies and code of conduct of the Company, inequality of practice in order to be correct, appropriate, transparent and fair. All information of the whistleblower or complainant and the matter will be kept confidential to prevent cases of rights violations

2. The scope of whistleblowing or complaints

The whistleblower or complainant reports the matters of

1. Illegal acts, non-compliance with corporate governance policy, ethics, anti-corruption business operation
2. Violation of regulations and article of association of the Company
3. Conduct inaccurate financial reports, defective internal control system and preparation of false financial documents
4. Actions that are conflicts of interest

3. How to report or complain

In order to treat all stakeholders equally and with fairness in accordance with the principles of supervision of the business, the Company has provided a channel for receiving whistleblowing or complaints showing that there are stakeholders who have been affected or are at risk by the Company's business operation or the practice of directors, executives, employees or employees of the Company in illegal or ethical conduct including any behavior that may imply corruption, unequal treatment or lack of caution and indiscretion.

Whistleblowers or complainants can report wrongdoing through the following methods. They must provide specific details regarding the name of the alleged wrongdoer and the incident of wrongdoing, with reliable information and supporting evidence (if any), as well as Whistleblowers or complainants' name, address, and contactable telephone number clearly. This is to enable the Company to inform them of the investigation results, report progress, clarify facts, or mitigate damages conveniently and promptly. The reporting methods are as follows:

- (a) In the event that the reported individual holds a position from Chief Executive Officer (CEO) upwards, reports should be made to the Chairman of the Board of Directors and/or the Audit Committee through the following reporting channels:

1. By mail

Chairman of the Board of Directors and Audit Committee
SISB Public Company Limited
498/12 Soi Ramkhamhaeng 39 (Tepleela 1)
Kwang Wang Thonglang, Khet Wang Thonglang Bangkok 10310

2. Email to **Chairman of the Board of Directors and Audit Committee** at whistleblow@sisb.ac.th
3. Suggestion Box located at the Company's Head Office.
4. Company Website www.sisb.ac.th under the topic "Whistleblowing / Incident Report".
5. Other communication channels such as chat applications.

(b) In the event that the reported individual holds a position below the Chief Executive Officer (CEO), reports should be made to the Chief Executive Officer through the following reporting channels:

1. By mail

Chief Executive Officer

SISB Public Company Limited

498/12 Soi Ramkhamhaeng 39 (Tepleela 1)

Kwang Wang Thonglang, Khet Wang Thonglang Bangkok 10310

2. Email to **Chief Executive Officer** at whistleblow@sisb.ac.th

3. Suggestion Box located at the Company's Head Office.

4. Company Website www.sisb.ac.th under the topic "Whistleblowing / Incident Report".

5. Other communication channels such as chat applications.

The Company designates one Executive Director or/and the Head of Compliance to receive suggestions, complaints regarding misconduct, and reports of corruption/fraud. This designated person/team shall proceed to submit the matter to the Chairman of the Board and/or the Audit Committee and/or the Chief Executive Officer, as well as be responsible for tracking the results and communicating the final outcome of the complaint or corruption report until the process is complete.

However, whistleblowers or complainants can choose to remain anonymous if they believe that disclosure could lead to insecurity or any form of harm. Whistleblowers and complainants can also submit reports or provide information through more than one channel. However, self-disclosure enables the Company to provide feedback on the progress or further details regarding the reported matter or information provided.

The Company classifies information related to whistleblowing and complaints as highly confidential and requires that the security of this information be maintained.

The Company will conduct the audit with a written investigation record and not reveal the whistleblower or complainant name

4. Process of action when receiving complaints

When receiving complaints, The Company will proceed with the investigation and gathering of facts. The recipient of the whistleblowing report or complaint will submit the received information as follows:

(a) In the event that the reported individual holds a position from Chief Executive Officer (CEO) upwards, the matter shall be presented to the Chairman of the Board of Directors and/or the Audit Committee and/or the individual(s) or department(s) assigned by the Chairman of the Board of Directors and/or the Audit Committee to act as the "Investigator" maybe assign internal audit or designated unit to gather relevant facts and to inspect information received from the whistleblower or the complainant. In the case of the information found basis of truth, it will be presented to the Audit Committee and the Board of Directors to acknowledge and appoint the investigation committee for further consideration.

After the investigation committee is examined, it will give advice on actions taken to the Audit Committee and the Board of Directors to consider and impose penalties.

(b) In the event that the reported individual holds a position below the Chief Executive Officer (CEO), the Chief Executive Officer and/or the individual(s) or department(s) designated by the Chief Executive Officer to act as the "Investigator" shall proceed to gather the relevant facts. This includes reviewing and screening the information received from the whistleblower or complainant. If, upon

investigation, it is found that there is merit to the report, the assigned Investigator will present the matter to the Investigation Team for further consideration in the relevant aspects.

Following the Investigation Team's investigation of the facts, the Investigation Team shall have the authority to consider and determine appropriate corrective actions and to consider and impose penalties in accordance with the Company's work regulations, rules, or relevant laws. The Team will also gather information, summarize the investigation report, and report the investigation findings and outcomes to the Audit Committee for acknowledgment. This may be compiled into a summary report of whistleblowing reports and complaints on a quarterly or annual basis, with statistical information potentially disclosed through the Company's communication channels, such as the Company's website.

5. Investigations and penalties

If the information or evidence found good reason to believe that the accused has committed misconduct, corruption, violation of law or regulations or the Company, the Company will give the right to the accused to acknowledge the allegation and to prove self for more information or evidence. The offender whether they are directors, executives, employees or employees of the Company will be subjected to both legal and disciplinary penalties in accordance to Company's regulations

6. Measures to protect the whistleblower or complainant

6.1 In order to protect the rights of the whistleblower or complainant who act with good faith, the Company will not reveal the name and address and those who provide information will be kept confidential and accessible to those responsible for investigating the complaint.

6.2 The Company considers the information of whistleblowers or complainants to be confidential and will disclose it only to the extent necessary, considering the safety and potential harm to the whistleblower, complainant, or informant, as well as related individuals, under the Personal Data Protection Law. In this regard, the recipients of the complaint, investigators, and those responsible at every stage must maintain the received information as highly confidential and shall not disclose it to any other individuals under any circumstances. Violation of this will be considered a disciplinary offense and/or subject to legal penalties.

To protect data subjects acting in good faith as whistleblowers, complainants, or informants, the Company will conceal their names, addresses, email addresses, phone numbers, or any other information that could identify them and will keep their personal data strictly confidential, limiting access only to the investigators and those responsible for handling the investigation of the complaint.

The use and disclosure of personal data will be based on the consent of the data subject, and the personal data will be destroyed upon expiry of the retention period or upon the data subject's withdrawal of consent in accordance with the policy or the Personal Data Protection Law.

6.3 In case there is a complaint in regard of corruption of the director or executives, Audit Committee will be responsible to protect the whistleblower or complainant. The Company will not conduct any unfair practice relating to change of position, work, place of work or work suspense, threatening, disrupting performance, dismissing or taking other acts of nature. Information is kept confidentially and disclosed as required by law.

6.4 The Company will not penalize or take any negative action against complainants or employees who refuse bribery or corruption, even if such actions result in the Company losing business opportunities.

6.5 The Company will provide remedies to those who have suffered damage through appropriate and fair methods or processes.

6.6 The Board of Directors, Audit Committee, Chief Executive Officer, or their designees may consider implementing additional protection measures for complainants, whistleblowers, or those who cooperate in the investigation, as deemed appropriate, if it is perceived that there is a potential



risk of damage or insecurity to such individuals resulting from their reporting or whistleblowing under this policy.

7. Whistleblowing or false complaints

If the Company finds that whistleblowing or complaints or any giving verifiable word or information is an act of false intended to cause damage, in the case of being an employee of the Company, the individual will receive disciplinary action according to the Company's regulations or legal act for the otherwise.