



Whistle Blowing Policy

Group Lease Public Company Limited

And subsidiaries

Thailand

-Translation-

Group Lease Public Company Limited

Whistle Blowing Policy

(Amended (1) by the resolution from the Board of Directors' Meeting No. 11/2019

Held on 17th September 2019)

Rational and Principle

Group Lease Public Company Limited (the “**Company**”) realizes the importance of conducting business based on transparency and free from bribery or corruption. Therefore, the Company has provided channels for both outsiders and its own directors management and employees, who may suspect or have observed any unethical practices on the part of the Company’s directors or its employees, such as, bribery, corruption, violation of the law, corporate rules and regulations or good governance, including the Company’s Code of Business Ethics, which might adversely affect the business interests of the Company.

Objectives

1. To encourage directors, management, employees and all stakeholders of the Company to report any misconduct or any fraudulent acts related to the Company.
2. To provide secure and confidential channels for reporting misconduct or fraudulent acts.
3. To prevent misconduct and fraudulent acts in the Company and help to detect and reduce losses that may arise as a result of misconduct and fraudulent acts.
4. To enhance the good image and ethical practices of the Company and its directors, management and employees.

Criteria for Considering Complaints:

1. Complaints or information reported should involve unethical practices such as fraud, bribery or corruption whether they directly or indirectly violate the law, the Company’s rules & regulations, the corporate governance policy, and the Company’s Code of Business Ethics, as well as other illegal practices which might adversely affect the Company’s image.
2. The whistleblower, whether he/she is the Company’s employee or an outsider, shall willingly provide his/her name, address and telephone number or other contact channel by which he/she can be contacted for further information, whereby his identity shall be treated with the strictest confidentiality.
3. If the name and contact address of the whistleblower is not provided, such complaints shall be disregarded.

Reporting Procedure

Any employee or an outsider who observes any suspicious act of corruption or bribery or a suspected violation of the law, the Code of Business Ethics or the good corporate governance policy of the Company may report suspicions or complaints together with related details and evidence to the Company via 3 channels as detailed below:

1. By postal mail box addressed to:

Chairman of the Corporate Governance Committee
Group Lease Pcl.
P.O Box 149, Bang Sue,
Bangkok 10800

2. By e-mail address: whistleblowing@grouplease.co.th
3. By LINE ID: GLWhistleblowing with QR Code



The Whistleblowing Policy shall be announced together with the above channels to the directors, management and employees via the intranet system and shall be disclosed on the Company's website and in the Company's Annual Report for outsiders' acknowledgement.

Procedure for Investigation

1. In the case of complaints received via the postal mail box, the Internal Audit Manager shall be responsible for opening the said post office box and collecting the incoming complaint letters. In the case that complaints are received via e-mail and LINE, the receiver will be Chairman of the Corporate Governance Committee.
2. The Internal Audit Manager shall be the person who opens the complaint letters in the presence of at least 2 other witnesses assigned by the Chief Operating Officer in the interests of transparency and to avoid any conflicts of interest. If the complaint is against any of the assigned persons, he should be considered as having conflict of interest and therefore shall not be allowed to be in the committee for the next process.
3. All of the complaints received via the postal mail box as well as via e-mail and LINE received by the Chairman of the Corporate Governance Committee shall be categorized into related or non-related according to the criteria of consideration abovementioned and registered by the Internal Audit Manager accordingly.
4. Those complaints that comply with the criteria of consideration shall then proceed to the investigation stage. The Chief Operating Officer shall be authorized to appoint Investigation

Committee members as deemed appropriate. However, members of the Investigation Committee should include the Human Resources and / or Legal Manager to provide legal advice on disciplinary action or penalties (if any)

5. After investigation, if the Investigation Committee has reason to believe from the presented evidence that the accused person is guilty, such person shall be provided with the opportunity to make a defense statement. The defense statement shall be made in writing and submitted together with related documents (if any) in order to prove his/her innocence in line with the Company's rules regarding the filing of complaints.
6. The Investigation Committee shall conclude the investigation result and may recommend the disciplinary action or penalties to the Chief Operating Officer, who shall have the authority to decide on the proper penalties for the guilty person in line with the set Company's rules or to proceed with legal action if such action is in violation of the law.
7. The Internal Audit Manager shall summarize the case and report to the Audit Committee for acknowledgement in the next Audit Committee meeting with the exception of a reported case which is deemed to have a significant impact on the Company's image or in the case where the director or a key member of the Company's management is the accused person, which needs to be reported immediately to the Audit Committee for investigation or for further instruction as deemed appropriate.
8. At yearend, the Internal Audit Department shall produce a summary of the complaints on corruption cases and disclose it in Form 56-1 and in the Company's Annual Report as well as in the Corporate Governance Report.

Protection of the Whistleblower

In order to protect the rights of the whistleblower or those who reveal the information, the Company shall take appropriate steps to conceal the identity and address or other information that can lead to the identity of the whistleblower. An employee who discloses their suspicions, if it is done in good faith, will not be penalized or subject to disciplinary action or demotion, suspension or layoff or any other actions that may have an adverse effect on such employee. The information on alleged unethical practices or illegal acts, or complaints or suspicions and documents disclosed by whistleblower shall also be kept confidential and only those who are involved in the investigation process can have access to such information, with the exception being in the case where the disclosure is for legal purposes which can only be disclosed with the approval of the Chief Operating Officer.

Effective Date

The Whistle Blowing Policy (Amended no. 1) shall be effective on 18th September 2019.

(Mr. Skol Hansuthivarin)
Chairman of the Board of Directors
Group Lease Public Company Limited