

Whistle Blowing Policy
Thai Life Insurance Public Company Limited

1. Overview

Thai Life Insurance Public Company Limited (the “**Company**”) has established a policy and guidelines of whistle blowing in order to prevent risks and damages that may impact stakeholders from the offense of laws or code of conduct or behavior on duty of Board of Directors, Management or Staff and third parties. Furthermore, this shall be a practice guideline, which has a clear, honest, transparent and compliant with the relevant laws, rules and regulations.

2. Scope of policy

2.1 Behavior related to any action to seek unlawful benefits including fraud, theft, misappropriation, corruption, and bribery.

2.2 Fraudulent behavior or distortion of financial report which have an intention to deceive others by displaying false messages or concealing the true message which should be informed.

2.3 Behavior related to the transactions that violate the relevant laws and notifications, the Company’s Good Corporate Governance Policy, and the Code of Conduct.

2.4 Behavior related to discrimination or unethical.

3. Definition

3.1 “Board of Directors”	Means	Board of Directors of the Company
3.2 “Audit Committee”	Means	Audit Committee of the Company which has qualifications and duties in accordance with the relevant laws and notifications.
3.3 “Management”	Means	Chief Executive Officer, and the first four executive level positions which count downwards and those who hold positions equivalent to those of the fourth executive level positions and shall include persons who hold the highest management level position of accounting or finance section at the level of department director or higher or equivalent.
3.4 “Staff”	Means	The Company’s employees at all levels whether they are full-time employees, temporary staff or contract employee.
3.5 “Misconduct”	Means	Acts that violate or do not comply with the relevant laws and notifications, policies, regulations, orders or regulations of the Company which includes the Good Corporate Governance Policy, and the Code of Conduct, discriminatory actions or unethical.
3.6 “Fraud”	Means	Any act or omission to seek unlawful benefits for oneself or others such as fraud or distortion of financial report which is intentionally to deceive others by displaying false messages or concealing the true message which should be informed, internal fraud, theft, misappropriation, corruption, and bribery, etc.
3.7 “Whistleblowing”	Means	Providing information or complaints related to misconduct or fraud, or actions that may lead to misconduct or fraud, whether they are affected or damaged by such circumstance or not.

4. Channel for whistle blowing

Witnesses, suspects, or those who become aware of misconduct or fraud or behavior that may lead to misconduct or fraud, whether they are affected or damaged by such circumstance or not can inform the clues or complaint via the following;

- 4.1 E-Mail whistle@thailife.com
- 4.2 Postal To the Audit Group
Thai Life Insurance Public Company Limited
No. 123 Ratchadaphisek Road, Din Daeng Subdistrict,
Din Daeng District, Bangkok, 10400.
- 4.3 Online <https://investor.thailife.com/en/corporate-governance/whistleblowing-form>

5. Whistleblowers

Those who encounter circumstance, acknowledge or notice suspicious issue in good faith whether they are affected or damaged by such circumstance or not that the Board of Directors, Management, Staff or any person acting on behalf of the Company are misconduct or perform any fraud or conduct that may lead to any misconduct or fraud. They can inform the clues via the provided channel in order to carry out the process by the related person as specified by this policy.

6. Conditions for Considering Receiving Clues

- 6.1 In the case that the investigator has considered and opined that clues are not sufficient for the investigation, not clear regarding the unidentified witnesses, evidences or behavior leading to misconduct or fraud for fact investigation. The investigator will prepare a summary report of facts and reasons to support the investigating the discretion of investigators.
- 6.2 Whistleblower can choose not to reveal name and contact information if such disclosure will be the cause of insecurity or any damage, but if there is a self-disclosure that will allow the Company to be able to report the progress, to ask for more useful information including clarification the fact or to mitigate the damage more convenient and faster. The Company will not disclose the identity of whistleblower. Moreover, to prevent the use of whistle blowing process to be a tool to persecute others, in the case that the whistleblower is an anonymous person, the Company will consider all the facts and evidences. If there is not enough information, the Company may consider suspending the further actions.
- 6.3 The whistleblower and accused person will be protected according to the Company's measures.
- 6.4 The duration of the proceedings regarding the received clues depends on the complexity of such clues, data adequacy, evidences, documents received from the whistleblower, including evidences, documents, and explanations from the accused person.

7. Responsible Person for Investigation when receiving clues

- 7.1 In the case of whistle blowing regarding behavior under item 2.1 or 2.2, the Audit Group or the person who is appointed by the Company will be an investigator.
- 7.2 In the case of whistle blowing regarding behavior under item 2.3 or 2.4, the Human Resources Group or the person who is appointed by the Company will be the investigator.
- 7.3 In the case of whistle blowing regarding behavior under item 2.1 - 2.4 is a complex issues and involves many parties, the investigator may propose to the Chief Executive Officer in order to appoint a working group for the investigation.
- 7.4 In the case of the head of Audit Group or the head of department who is the accused person and receives the clues, the investigator shall propose the issue to the Chief Executive Officer in order to appoint a working group for investigation.

8. Process

8.1 Gathering facts

The Audit Group who receives clues shall collect the relevant facts and check clues in order to obtain the evidence for confirmation with the information received and send clues to the investigator within 10 business days from the receipt of information reported unless there is a reason that the action cannot be performed within the said period, so that investigator is enable to process and screen the information further.

8.2 Investigation process

8.2.1 In case of whistle blowing regarding behavior item 2.1 or 2.2, the investigator shall investigate the facts including to collect related witnesses and evidences, to propose such details of facts, related witnesses and evidences to the Chief Executive Officer to order or provide any orders or measures for suppression of contravention or fraud and to mitigate the damage for the affected person or provide any other order as appropriate.

8.2.2 In case of whistle blowing regarding behavior item 2.3 or 2.4, the investigation and various actions shall be in accordance with work regulations and regulations on personnel management of the Company.

8.3 Reporting of the investigation results

The Audit Group shall prepare a summary of the investigation report concerning the clues that has been informed, including the report of arrangement and reparation for the damage or suspension or termination of the investigation. The Audit Group also shall propose such reports to Audit Committee and the whistleblower, in the case that the whistleblower reveals his or her identity within 30 business days from the receipt of information reported unless there is a reason that the action cannot be performed within the said period.

9. Protection Measures of Whistle Blowing

9.1 The protection measures for whistleblower

In order to protect the whistleblower and the person who cooperates for the fact investigation from persecuting, intimidation or abuse of power, the Company has established the protection measures with the details as follows;

9.1.1 The Company will not do anything that is unfair to the whistleblower either by changing of the job position, job description or work place, suspending work, threatening, interfering during work, terminating employment or any other action that has an unfair manner to such person who informs clues regarding the misconduct or fraud or cooperates for the benefit in the fact check according to this policy.

9.1.2 The Company considers the information of the whistleblower and the person who cooperates in providing and scrutinizing the facts are the highest level of confidentiality. The Company will not disclose any part of information that could allow other people to identify such person. All information will be disclosed only to the person who has direct responsibilities as required by this policy unless it is in compliance with the laws.

9.1.3 In the case that the whistleblower or the person who cooperates for the fact investigation deems that they may be insecure or get into trouble, the whistleblower or the person who cooperates for the fact investigation can request the Company to specify an appropriate protection measures. Nevertheless, the Company may impose the protection measures without request from the whistleblower or the person who cooperates for fact investigation if it is prone to damage or insecurity.

9.1.4 The affected or damaged person will be mitigated through appropriate and fair procedures.

[Translation]

9.2 The protection measures for accused person

- 9.2.1 The investigator shall investigate and screen the clues to ensure whether the information is sufficient for further investigations or not. This is to prevent any person from using the whistle blowing process as a tool to persecute others.
- 9.2.2 Upon the investigation process, the investigator must give the accused person the right to be informed of the allegations and the right to prove oneself by providing the additional information or evidence to demonstrate that have he or she did not perform or was involved with such clues.
- 9.2.3 During the investigation of such clues, the Company shall not consider the accused person as an offender. However, in the case of having the reliable witnesses and evidences to believe that the accused person may be the offender, the Company shall provide the suitable measures in order to prevent further damage to the Company and Stakeholders.
- 9.2.4 When the investigation has been completed and it is concluded that the accused person is the innocent person, the Company may determine an appropriate and fair measures to remedy the impact on the accused person.

10. Penalty

Whoever does anything intentionally or negligently not comply with this policy including behavior of persecution, intimidation, disciplinary punishment or discriminated against by unjust methods due to the whistleblowing or from cooperating in the investigation of facts is considered a disciplined offense. This leads to disciplinary action according to the Company's regulations and if non-compliance with the policy is considered illegal, the violators must be prosecuted as required by law.

In addition, in the case that the investigation finds that whistleblower acted with malice, intended to persecute others or intentionally gave the false information and the whistleblower is a Board of Directors, Management, or Staff, the Company shall consider and investigate in accordance with the Company's personnel management regulations. If the whistleblower is a third party, customer, business partner which are the cause of the Company damaged, the Company may consider to take a legal proceedings.

11. Policy review and update

In the event of any change in laws, regulations, policies or guidelines that affects this Policy, or if this policy becomes inappropriate or insufficient for business operation, the Compliance Department shall propose the amendments as it may deem appropriate to the Board of Directors for consideration and approval.

(The policy shall be effective as of 14 August 2024 onwards.)