

**-Unofficial Translation for those who unfamiliar with Thai-**  
**Whistle Blowing Policy**  
**B.E. 2561**

**AIRA & AIFUL Public Company Limited**

## Whistle Blowing Policy

### A. Rational

AIRA & AIFUL Public Company Limited (“Company”) As a provider of personal loan with the company's vision is to be a personal loan company, the fastest growing in the country, Thailand, coupled with efficient growth. Encourage and prioritize the business operating in an honest and ethical manner, as well as compliance with the relevant laws and regulations strictly. The Board of Directors has approve whistle blowing policy in order for Misconduct and fraud channel for the executive staff and stakeholders to complaints, regards whistle-blowing rules & regulations, ethics, financial reporting ,the internal control system fault and fraud company.

### B. Objective

The policy is intended to

- 1.) To encourage and support directors, management and all employees of the Company, as well as stakeholders can claim and whistle-blowing regards illegal activities, misconduct and fraudulent related to the Company.
- 2.) Define the safety channel and confidential information in the complaint, helping of whistle blower confident to report.
- 3.) Protection of employees who report or complaints whistle blowing case, as well as cooperation or assistance to provide the information in order not to harassing, threatening.
- 4.) Suppression of illegal, misconduct, fraudulent and corruption which it may occur in the company and helping to detect and mitigate the damage caused by the misconduct or fraudulent.
- 5.) To promote the image and having good ethics of the company and the employees.

### C. Scope of Enforcement.

This policy shall apply to all directors, executives officer and employees of the Company, including persons or entities who interact with the company covering misconduct and corruption (either depicted or suspect) that are associated with directors, executives officer , employees , customers, vendor shareholders and stakeholders which has business relationship with the Company.

In case of any message or any content in the policy is inconsistent with the law, it can enforce only not violate or conflict the applicable law.

## Chapter 1

### General Provision

**Article 1.** In this policy

**“Company”** means AIRA & AIFUL Public Company Limited

**“Employee”** means all employees of AIRA AND AIFUL PUBLIC COMPANY LIMITED

**“Line Manager”** means the employee in the level of management or manager level above who can be trust by subordinator to inform and/or report whistle blowing case.

**“Vendor or Supplier”** means individuals or juristic person who have relationship or business transaction with the Company, or who is a beneficial person by having business transaction or business relation with the Company, including person who has been assigned or authorized to carry on a business relationship with the Company.

**“Misconduct”** means the acts or omission of management or employees, those action shall be violated to the company ethic, internal working rules and regulations and/or policy as well as applicable law related to company business.

“**Fraud or corruption**” means the intentionally illegal action in order to get the benefit or advantages, unlawful to themselves whether directly or indirectly action including corruption, fraudulent, or furnishing financial statement.

“**Whistle Blowing**” means the act of telling the authorities or the public that the organization you are working for is doing something unethical or illegal, corruption, fraudulent.

“**Whistle Blower**” means directors , managements , employees of the company including stakeholder inform or report the illegal, corruption, fraudulent case within the company by good faith.

## Chapter 2

### Roles and Responsibility

#### Article 2. Board of Director

The Company Board of Director has approved the policy as a guideline framework in written align with company code of conduct.

#### Article 3. Management and Line Manager

3.1) Act as a good role model, as well as monitoring and encouraging subordinates to follow the code of conduct. Regulations and policies of the company;

3.2) to promote and provide risk management environment system and internal control are adequate and effective to prevent misconduct and corruption in their own responsibility;

3.3) to ensure that all employees in the work unit had to acknowledge this policy;

3.4) created the proper environment to build trust with the complainant to complaint;

3.5) when found the illegal activities, misconduct and/or fraudulent, notify the Compliance Department via the channel stated in the policy.

**Article 4. Employees**

4.1) acknowledged and action follows the policy;

4.2) report to line manager or define channel stated in the policy when found the illegal activities, misconduct and/or fraudulent;

4.3) Cooperation and assistance to the relevant authorities of the companies when needs case investigation.

**Article 5. Compliance Department**

5.1) provide advice regards the policy to the management and all employees including communication and training to all employees about the methodology process of whistle blowing and channel for reporting;

5.2) Act as coordinate person to receive the case and inform the result of case progress to whistleblower and complainant, however; it shall be keep confidential and disclose as necessary;

5.3) Prepare summary whistle blowing case report submitting to Chief Executive Officer (CEO).

**Article 6. Internal Audit Department**

6.1) Prepare summary report of whistle blowing case submitting to Audit Committee (AC) by quarterly.

**Chapter 3**

**Whistle Blowing Reporting Channel**

**Article 7.** When found the whistle blowing case and/or suspect case occur, it shall report through proper channel as following;

1. Trustworthy Line Manager in all level
2. Company Website

3. Email to Compliance Department via specific email setting for whistle blow case
4. Submit written letter to Chairman of Audit Committee following the address  
**AIRA & AIFUL Public Company Limited No. 319 Charmchuri Square  
Payathai District Bangkok 10330**

**Article 8.** In case Whistleblower is a line manager receiving the case and/or found the case, he or she shall be required to inform compliance department.

**Article 9.** Whistleblower should fill in the complaint & misconduct and Fraud report form (**attachment 1**) as adequate and necessary in order to fact finding investigation, in addition; whistleblower shall disclose the name-surname address or contact information. However; Whistleblower yourself can have a right to disclose or close the name.

#### Chapter 4

##### Whistleblowing case receiving process

**Article 10.** The Company by the Whistle Blowing Committee may set up fact finding sub-committee to investigate whistle blow case and consideration as proper and necessary.

**Article 11.** The fact finding committee as refer on Article 10 shall composed of Vice President or equal to head of department from Internal Audit Department, Compliance Department, Legal Department, Human Resource Department and Complainant Department. (However, the committee member shall not be conflict of interest).

The Whistle blowing investigation process and fact finding shall be independent and impartial, in order to obtain evidence which can be used to confirm or contradict with the information received, including disciplinary action up to and/or legal prosecution against offenders in accordance with the rules and regulations of the company and applicable law.

## Chapter 5

### Protection Measurement for Whistleblower

**Article 12.** The Company shall have protection measurement for whistleblower in order to prevent bullying, threatening or destroying evidence as follows;

- 1) Protect and not allow having bullying to the Whistleblower including cooperation person who provide information in a good faith.
- 2) It shall not disclose whistleblower or compliant in the status of investigation and fact finding state.
- 3) The company shall keep information as confidential and disclose information whistleblower and/or related person as much as necessary under reasonable situation,
- 4) Whistleblower and/or petitioner who involving the case may request the company provide protection measurement.

## Chapter 6

### Policy Maintaining

**Article 13.** The Board of Director shall appointment the whistleblowing committee acting as policy maintaining and has an authorization to set up fact finding committee including issue related rules and regulations, company announcement and give power attorney as proper and necessary under the objective of this policy.

In case is no whistleblowing case arising in each year , the whistleblowing committee shall be required to have a meeting at least 1 time per year or more as proper and necessary.

## Chapter 7

### Disclosure and reporting

**Article 14.** The company shall disclose the whistle blowing policy and resulting on the annual reporting and company website, to follow company corporate governance.

**Article 15.** The company shall inform the summary result of consideration and punishment to Audit Committee and the Board of Directors.

## Chapter 8

### Policy reviewing

**Article 16.** Legal and Compliance Division shall update and review the policy by annually as regularly and proposed the reviewing to the Board of Directors for approval.

## Chapter 9

### Punishment

**Article 17.** When the person who, willfully or negligently, unfollows or breach the policy including threatening disciplinary action, or discrimination., disclose information of whistleblower and/or related person caused the damaging and unsafety or caused any violations. Those can be considered as disciplinary actions, and shall be liable for company damaging, or who have been affected by such action as well as liability in civil and criminal prescribed by law.

This policy shall be enforcement on 8 August 2018 onward



แบบแจ้งเรื่องร้องเรียน/เบาะแสการกระทำผิดและการทุจริต  
COMPLAINT & MISCONDUCT AND FRAUD REPORT FORM

วันที่รายงาน: \_\_\_\_\_

Date of report

ชื่อ- นามสกุล \*(เลือกที่จะไม่เปิดเผยได้): \_\_\_\_\_

(Whistleblower's name (Optional))

ที่อยู่: \_\_\_\_\_

(Address)

หมายเลขโทรศัพท์: \_\_\_\_\_ อีเมล: \_\_\_\_\_

(Telephone)

(E - Mail)

บริษัทที่เกี่ยวข้อง: \_\_\_\_\_

(Name of involved company)

วันที่เกิดหรือพบเห็นการกระทำผิด: \_\_\_\_\_

(Date of incident (and/or date misconduct or fraud was discovered))

โปรดระบุรายละเอียดเรื่องร้องเรียนของท่าน หรือ ลักษณะการกระทำผิดหรือการทุจริต:

(Please provide full details of the type of misconduct or fraud committed or suspected)

\_\_\_\_\_  
\_\_\_\_\_

ชื่อ-นามสกุล ตำแหน่งของบุคคลหรือกลุ่มบุคคล และมูลเหตุที่ทำให้ท่านเชื่อว่ามีส่วนเกี่ยวข้องกับเหตุการณ์:

(Name(s) and job title(s) of person(s) who is believed to be involved and the basis for your belief)

\_\_\_\_\_

มูลค่าของเงินหรือทรัพย์สินที่เกี่ยวข้อง / ประมาณการความเสียหายที่คาดว่าจะเกิดขึ้น (ถ้ามี):

Where money or other valuable assets are involved, estimate the suspected loss (if any)

\_\_\_\_\_

หมายเหตุ: โปรดแนบเอกสารเพิ่มเติม (ถ้าจำเป็น)

(Remark: Please attach additional document(s) (if any))