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Whistleblowing Policy

Objectives

The Company and its subsidiaries are determined that the Company and its subsidiaries and the executives adhere to the standards of good practices so that if any improper behavior occurs, such behavior must be investigated. Appropriate actions must be taken to maintain the reputation of the Company and its subsidiaries.

The objectives for establishing a whistleblowing policy is to be a mechanism for employees of the Company and its subsidiaries as well as outsiders in whistleblowing various issues without discrimination, or any retaliation or threat. This whistleblowing policy will be a practical guideline for employees who wish to report issues related to wrongful behavior, abnormal behavior or inappropriate behavior that occur within the Company and its subsidiaries which must be kept confidential.

The Company and its subsidiaries have set up a whistleblowing method to be confidential so that employees who witness or are concerned about the occurrence of wrongful or abnormal behavior within the Company and its subsidiaries or employees who wish to propose various ideas to the Company and its subsidiaries can do so more conveniently.

Whistleblowing Method

Events that may lead to the use of this mechanism, may cover misconduct in various manners. This includes, but is not limited to the following events.

- Criminal acts or inciting to commit an offense.
- Any random actions which includes corruption, bribery and blackmail.
- Non-compliance with legal or regulatory duties.
- Acts, behaviors or omissions in accounting, reports, records and guidelines and/or financial reporting or internal control that is suspicious or does not meet the standards or general practices.
- When an event is harmful to the health or safety of any person.
- When events cause damage to the environment.

- Acts that are a serious offense.
- Acts that are intended to damage or cause the Company and its subsidiaries to lose benefits.
- In the case that it is not possible to resolve or take reasonable steps to report matters that may cause unavoidable expenses or serious damage to the Company and its subsidiaries.
- Intentionally hiding various types of offenses.

If an employee witnesses any incident that whistleblowing is necessary, according to this method (such as the occurrence of the above events), the employee should make written contact or contact through electronic mail at ethics_hotline@indexlivingmall.com.

Investigation Periods

Investigations will begin as quickly as possible based on the seriousness of the allegations/complaints and the investigation will proceed with caution so that the quality and details of the investigation are not affected. The initial examination will find a conclusion of the investigation and will proceed within 2 weeks.

The Investigation Process

The investigation of misconduct and corruption must be done with fairness and without any prejudice in order to know the facts or prove whether the alleged person has committed a crime or fraud or not. The investigation must also must maintain the interests and reputation of the one accused.

The Internal Audit Department/Investigation Committee is responsible for investigating facts, evaluating and verifying the initial information received with any relevant department. When examining such information, the Internal Audit Department/Internal Investigation Committee can check emails, documents as well as any other information of the Company and its subsidiaries and able to inquire information from the one who provided information.

When investigating facts and verifying information and it is found that the information received has factual evidence that there may be a misconduct or fraud, the Internal Audit Department/Investigation Committee shall operate with any relevant departments to propose such matters to the senior executives or authorized persons of the Company and its subsidiaries in order to conduct disciplinary action or punishment according to the regulations of the Company and its subsidiaries.

Penalties

Whoever does not comply with this policy, whether intentionally or negligently, in areas that include bullying, threatening disciplinary action, or discriminating due to the complaint of a whistleblower, complainant,

or persons related to the complaint according to this policy, they shall be deemed to have committed a breach of discipline and must be responsible to compensate for any damages to the Company and its subsidiaries or those affected by such actions, and they may also be liable for legal penalties.

Keeping Information Confidential and Protecting the Rights of Complainants or Whistleblowers

This policy is designed to ensure that the complainant or whistleblower's complaints will be responded to seriously and they will not suffer as a result of reporting a complaint or whistleblowing with good intentions. They will not be forced to change job positions, job descriptions, be relocated, suspended or receive any bullying. The complainant or whistleblower should carefully collect information and take into account the accuracy of the information disclosed.

Complainants or whistleblowers can provide information without revealing their identity. The Company and its subsidiaries will not disclose the identity of the whistleblower and will keep the identity confidential throughout the investigation period. In addition, the person who has received the complaint or information related to this case must keep the complainant's information or any related information confidential without disclosing any information to any other persons by considering the safety and not damaging the complainant, whistleblower, information source, or any related person. The only exception is in the case it is necessary in the operation process according to the regulations of the Company and its subsidiaries or as required by law. If there is a deliberate violation of the information released, the Company and its subsidiaries will take disciplinary action and/or legal action against those who violate the regulations depending on the case.

In addition, the Company and its subsidiaries will not allow any action in response to employees who are complainants or whistleblowers and disciplinary action will be taken against any person who is found to have committed such retaliation. In the case that the complainant sees that he or she may be unsafe or suffering any damage, the complainant can request that the Company and its subsidiaries to determine appropriate protection measures. The Company and its subsidiaries will take appropriate steps to prevent any problems in the work environment and/or working relationship of any employees who have revealed their identity and blew the whistle for the benefit of the Company and its subsidiaries to suffer the effect.

This policy will only be effective if the disclosure of information is done in with good intention in the case the employee's motivation to disclose information comes from a real concern that there may be some wrongdoing and in that the employee reasonably believes that the disclosed information and any allegations made are actually significant.

In the case that employees disclose dishonest information (such as disclosing information about personal grievances or intentionally causing disunity within the Company and its subsidiaries), or information that employees do not truly believe is true (such as rumors), or in the case of disclosure of information for personal gain, such actions are considered a disciplinary offense and may be considered a serious offense. The

Company and its subsidiaries will conduct an investigation into the matter to consider any punishment in accordance with the regulations of the Company and its subsidiaries.

-- Mrs. Kannikar Chalitaporn--

(Mrs. Kannikar Chalitaporn)

Chairman of the Board of Directors

Index Living Mall Public Company Limited