



Whistle Blowing

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Laguna Resorts & Hotels Public Company Limited (“LRH”) Group sets out its Whistle-Blowing Policy & Procedure as follows:

Whistle-Blowing Policy

The Whistle Blowing Policy (the ‘Policy’) of LRH Group is to encourage and enable associates and third parties, such as customers, vendors, contractors and other stakeholders to raise any serious concerns below.

The Policy is designed to enable associates or third parties to raise concerns without fear of reprisal, discrimination or adverse consequences. The Policy allows LRH Group to address such concerns by taking appropriate action including, but not limited to, disciplining or terminating the employment and/or services of those responsible.

However, while the Policy is meant to protect genuine whistle-blowers from any unfair treatment as a result of their report, it strictly prohibits frivolous and bogus complaints. The Policy is also not a route for taking up personal grievances.

Scope

- Unusual/questionable accounting or auditing practices
- Disclosure matters
- Internal controls lapses or override
- Insider trading
- Conflict of interest
- Serious breaches of Group policy
- Collusion with competitors
- Unsafe work practices or
- any other matters involving fraud, corruption and employee conduct

Whistle-Blowing Channel

Group Internal Audit

- Hotline : +66 76 372400 ext. 6155
- Email : ethics@lagunaresorts.com
- Website : www.lagunaresorts.com

Whistle-Blowing Reporting Procedures

All concerns or irregularities raised will be treated with confidence and every effort will be made to ensure that confidentiality is maintained throughout the process.

Concerns are better raised in writing. The written report should clearly set the background and history of the matter, giving names, dates and places wherever possible and the reasons for the concerns.

All concerns or reports raised by whistle-blowers will be directed to Head of Group Internal Audit, the Receiving Officer, who is responsible for maintaining a centralized repository of all reported cases and ensuring that issues raised will be professionally and independently addressed, accessed and investigated and properly resolved.

All matters reported will be reviewed within a reasonable timeframe, after which a decision shall be made whether to proceed with a detailed investigation. Consultation is sought from the Whistle Blowing Evaluation Team which comprises members of the Audit, Risk and Corporate Governance Committee and the Head of Group Internal Audit. Result and conclusions of the investigation shall be reported to the Board of Directors.

Mechanism to Protect Whistle-Blowers

Genuine whistle-blowers will be adequately protected. If a whistle-blower believes that he or she is being subjected to discrimination, retaliation or harassment for having made a report under this Policy, he or she should immediately report those facts to the Whistle Blowing Evaluation Team. Reporting should be done promptly to facilitate investigation and the taking of appropriate action.

At the appropriate time, the party making the report may need to come forward as a witness. If an associate or third party makes an allegation in good faith but it is not confirmed by the investigation, no action will be taken against him or her.

However, if an associate has made an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against him or her. Likewise, if investigations reveal that the third party making the report had done so maliciously or for personal gain, appropriate action, including reporting the matter to the police, may be taken.

Managing of Reports/Concerns

It is within the sole discretion of the Whistle Blowing Evaluation Team to assign any personnel of the Group to perform the investigation and/or outsource the investigation, where necessary. All

information disclosed during the course of investigation will remain confidential, except as necessary or appropriate to conduct the investigation and to take any remedial action, in accordance with any applicable laws and regulations.

LRH Group reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him or her and be provided with an opportunity to reply to such allegations. Associates who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.

If, at the conclusion of an investigation, the Group determines that a violation has occurred or the allegations are substantiated, effective remedial action commensurate with the severity of the offence will be taken.

Amendment to the Policy

LRH Group reserves the rights to update this Policy as and when it deems necessary.