



## JUMP+ Plan

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## HENG LEASING AND CAPITAL PUBLIC COMPANY LIMITED

(HENG)

Year 2026 - 2028

This report was approved by the board of directors on 10/02/2026

and disseminated on 12/02/2026

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## HENG LEASING AND CAPITAL PUBLIC COMPANY LIMITED

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Financials / Finance & Securities

CG Report :

SET ESG Ratings: **AAA**

Anti-Corruption Certification (CAC): **Yes**

### Business Type

Provide hire purchase, personal loan under supervision with vehicle registration as collateral, home and land loans, personal loan under supervision which is not loan with vehicle registration as collateral, nano finance and non-life insurance and life insurance broker.

Financial Statement				
Year	2025	2024	2023	2022
<b>Income Statement (MB)</b>				
Revenues	2,152.60	2,860.72	2,877.73	2,124.36
Expenses	1,775.16	2,237.52	1,911.29	1,330.50
Net Profit	33.98	72.98	422.01	461.12
<b>Balance Sheet (MB)</b>				
Assets	9,176.68	13,087.97	15,673.20	12,263.65
Liabilities	4,100.17	7,847.53	10,257.11	7,019.30
Shareholders' Equity	5,076.52	5,240.44	5,416.09	5,244.34
<b>Cash Flow (MB)</b>				
Operating	4,226.40	2,814.27	-2,000.47	-2,021.46
Investing	14.80	-19.72	-60.12	-46.57
Financing	-4,220.60	-3,190.78	2,380.44	1,717.22
<b>Financial Ratio</b>				
EPS (Baht)	0.01	0.02	0.11	0.12
GP Margin (%)	N/A	N/A	N/A	N/A
NP Margin (%)	1.58	2.55	14.66	21.71
D/E Ratio (Times)	0.81	1.50	1.89	1.34
ROE (%)	0.66	1.37	7.92	9.17
ROA (%)	3.39	4.33	6.92	7.23

### JUMP+ Plan

#### Business Plan

##### Target in 2028

Net Profit **240.00** million Baht

Strategic Plan	Growth	Profitability & Efficiency	Stability
1. Strategic Plan 2026: Precise Lending and Elevating Collection to Excellence			

#### Governance Plan

- Enhancing anti-corruption and fraud prevention efforts
- Enhancing whistleblowing mechanisms
- Enhancing the prevention of insider information

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**Section 1**  
**Business Plan**

# Business Plan

## Target in 2028

Topic	YE/2022	YE/2023	YE/2024	Target in 2028
Net Profit (million Baht)	461.12	422.01	72.98	<b>240.00</b>

By 2028, Heng Leasing and Capital Public Company Limited aims to create "financial sustainability" by rebalancing its loan portfolio from quantitative expansion to qualitative efficiency improvement, coupled with stringent cost management and debt collection, with the goal of restoring profitability to a strong and consistent level.

### Approaches to achieve goals

**Asset Quality Improvement:** By considering loans based on Responsible Lending principles to ensure that customers genuinely have the ability to repay debts, focusing on loan products with clear objectives and verifiable income.

**Enhancing Collection Effectiveness:** The company aims to improve debt collection efficiency through systematic process improvements, defining strategies and follow-up methods appropriate for each debt aging period. Payment behavior data is analyzed for pre-delinquency follow-up (Early Follow-up / Early Warning). Systems are developed to increase convenience and speed in operations and collection management. These actions will adhere to Market Conduct principles to ensure debt collection is appropriate, fair, and maintains good long-term relationships with customers.

**Adherence to Governance and Sustainability (Governance & ESG):** Business operations will continue to uphold principles of transparency and social responsibility to maintain the AAA standard of SET ESG Ratings, which is a crucial foundation for building investor confidence.

## Growth plan/Increase business value

### Strategic Plan 2026: Precise Lending and Elevating Collection to Excellence

#### 1. Quality Lending Strategy

To mitigate the risk of non-performing loans (NPLs) from the outset, the company aims to improve its credit assessment process to be more thorough and aligned with customers' repayment capabilities, with the following key approaches:

**Selection of target customer groups:** Focusing on customer groups with clear and verifiable occupations and income sources, such as farmers with farmer registration books, and customers from car tent partners and agricultural stores, who have basic income data and spending history that can be appropriately used for credit consideration.

**Comprehensive assessment of repayment ability:** Utilizing data from internal systems in conjunction with on-site evaluations (Site Visit) and the experiential knowledge of loan officers to carefully assess customers' repayment capabilities under the company's risk management policy.

**Appropriate control of credit limits and loan terms:** Controlling nano-finance credit limits not to exceed necessity and customers' repayment capabilities, and setting effective interest rates according to Bank of Thailand criteria to ensure customers' ability to repay throughout the contract period.

**Responsible Lending:** Adhering to responsible lending principles by not encouraging customers to incur debt beyond their capacity and focusing on products that support sustainable livelihoods and income generation.

#### 2. Debt Collection and Asset Quality Management Strategy

In 2026, the company aims to enhance debt collection to be more systematic and continuous, focusing on improving operational processes and utilizing existing system data to support appropriate debt monitoring:

Cash Flow Matching: Adjusting repayment schedules to align with customers' actual income cycles, such as agricultural loans with repayment cycles set according to harvest seasons, to reduce the likelihood of default.

Close monitoring of debtors in the early stages (Early Follow-up / Early Warning): Increased attention to monitoring debtors who begin to show late payment behavior, using payment history data from internal systems. This enables the collection team to follow up, provide advice, and assist customers from an early stage, before the debt develops into long-term arrears.

Developing the potential of the debt collection team: Enhancing the skills of the debt collection team to focus on fair and appropriate negotiation, in line with the Market Conduct policy, to maintain good long-term customer relationships while increasing debt collection efficiency.

Utilization of IT systems to support debt collection: Employing SMS notification systems to remind customers of payment due dates and developing data summarization and reporting from existing IT systems to facilitate more convenient and systematic work tracking and performance reporting.

### 3. Product Development and Innovation

Focus on low-risk products with clear objectives:

Purpose-Driven Loan: Loans for specific uses: such as "Klaai Ron" loans (seasonal relief loans) or loans for agricultural production factors, which are loans with clear objectives, making it easier to assess the appropriateness of capital utilization compared to general cash loans.

#### This plan will promote and develop the organization in the following dimensions

- Growth
- Profitability & Efficiency
- Stability

#### Targets

##### Corporate Financial Targets

Topic	Latest data		Targets		
	YE/2024	YE/2025	2026	2027	2028
Net Loans and Accured Int. (MILLION BAHT)	12,314.46	8,609.91	6900	5700	5800

##### Strategic Initiative

Strategic Initiative	Year	Expected Outcomes
1. Quality Lending Strategy	2026	• 1,800 million Baht
	2027	• 2,200 million Baht
	2028	• 3,700 million Baht
2. Debt Collection Strategies and Asset Quality Management	2026	• NPL 7.5%

Strategic Initiative	Year	Expected Outcomes
	2027	• NPL 6.5%
	2028	• Non-Performing Loan 4.5%

**Risk Management**

**Risk 1**

Credit Risk

**Risk Characteristic**

- The company's primary income is derived from providing loans to a large number of retail customers.
- Debtors may experience a reduced ability to repay debt due to economic conditions and external factors.
- Default on debt payments by debtors may result in non-performing loans (NPLs).
- The company must exercise discretion in assessing the quality of debtors and setting aside provisions for credit losses.

**Risk Impact**

- Interest income decreased
- Increased provision for credit losses
- Impacted the company's operating performance and financial position

**Risk Management**

- Establish a stringent credit approval policy
- Assess customers' ability to repay debt appropriately
- Continuously monitor debtor quality and repayment status
- Regularly review and improve the credit risk management process

**Risk 2**

Liquidity Risk

**Risk Characteristic**

- The company's business requires a significant amount of working capital.
- The company relies on funding sources from financial institutions.
- Uncertainty in accessing funding sources may affect operations.

**Risk Impact**

- The company may not be able to secure sufficient funding for business operations
- affect the ability to expand business
- may face risks related to timely debt repayment

**Risk Management**

- Manage cash flow prudently
- Maintain good relationships with financial institutions
- Closely monitor liquidity status and debt obligations
- Plan capital management in alignment with the business structure

**Risk 3**

Interest Rate Risk (Interest Rate Risk)

**Risk Characteristic**

- Interest rate fluctuations in the financial market
- The company's financial costs may change in accordance with interest rates
- Net Interest Margin may be impacted

**Risk Impact**

- Interest costs increased
- Profit margins decreased
- Operating performance fluctuated

**Risk Management**

- Manage debt structure appropriately
- Continuously monitor interest rate trends
- Consider appropriate funding sources and financial terms

**Risk 4**

Operational Risk (Operational Risk)

**Risk Characteristic**

- Errors arising from operational processes, personnel, or systems
- Risks from inadequate internal controls
- Risks associated with the use of information technology systems

**Risk Impact**

- result in financial damage
- affect operational efficiency
- affect the company's reputation

**Risk Management**

- Establish appropriate internal control systems.
- Clearly define duties and responsibilities.
- Develop information technology systems and security measures.
- Continuously monitor and assess operational risks.

## **Section 2**

### **Governance Plan**

## Section 2 Governance Plan

### Accountability and Transparency Governance

#### Enhancing anti-corruption and fraud prevention efforts

1. Fostering a Corruption-Free Organizational Culture (Tone from the Top)
  - Leadership by Example: Senior executives must set an example of commitment to transparent business operations to instill awareness among personnel within the organization.
  - Public Declaration of Intent: Continuously proceed with the certification process to become a member of the Private Sector Collective Action Coalition Against Corruption (CAC), to affirm non-involvement in corruption, both directly and indirectly.
2. Strict Enforcement of Policies and Guidelines
  - Gift-Giving and Receiving Policy: The value of customary gifts must not exceed 3,000 Baht and must not result in undue advantage or inappropriate benefits.
  - Political Neutrality: The company must maintain neutrality, refraining from providing financial or material support to political parties or politicians in exchange for any special privileges.
  - Prohibition of Facilitation Payments: No money or benefits shall be paid to government officials to induce or expedite actions in the performance of their duties.
3. Personnel Development and Awareness Building
  - Mandatory Training Courses: All employees at every level are required to attend the "Driving the Organization Towards a Corruption-Free Enterprise (Anti-Corruption)" course and the "Honesty & Transparency for Efficiency and Sustainability" course annually.
  - New Employee Orientation: All employees must acknowledge and sign off on the Anti-Corruption Policy and Business Ethics content upon commencing employment.
4. Whistleblowing System and Informant Protection
  - Diverse Reporting Channels: Whistleblowing channels are provided via hotline 1361, the company website, or email whistleblower@hengleasing.co.th.
  - Protection Measures: Whistleblowers acting in good faith will be protected from termination of employment, unfair transfers, or harassment interfering with their work.
  - Confidentiality: Personal information of whistleblowers and details of complaints will be kept strictly confidential.
5. Auditing and Proactive Risk Management
  - Regular Risk Assessment: The Risk Management Department must continuously test and assess corruption risks to update measures in line with changing circumstances.
  - Independence of Audit Unit: The Internal Audit Department is responsible for auditing operations according to the annual plan and reporting significant findings directly to the Audit Committee.
  - Strict Penalties: In the event of policy violations, disciplinary actions will range from warnings to termination of employment, and legal proceedings will be initiated if clear wrongdoing is established.

#### Targets

Topic	Current Status	Targets		
		2026	2027	2028

The company has established an anti-corruption policy and practices.	Complete	-	-	-
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Topic	Current Status	Targets		
		2026	2027	2028
<ul style="list-style-type: none"> <li>An anti-corruption and anti-bribery policy has been developed to comprehensively cover the organization's business operations, formally approved by the Board of Directors, and supported by clear and practical implementation guidelines</li> </ul>	Complete	-	-	-
<ul style="list-style-type: none"> <li>The company conducts regular monitoring and evaluation of compliance with its anti-corruption and anti-bribery policy and procedures. Audit results are reported by internal auditors to the Board of Directors at least annually. In the event of any violations, corrective actions and preventive measures are clearly defined to prevent recurrence</li> </ul>	Complete	-	-	-
<ul style="list-style-type: none"> <li>The company conducts an annual review of its anti-corruption and anti-bribery policy and practices with the Board of Directors</li> </ul>	Complete	-	-	-
Achieve CAC certification from the Thai Institute of Directors (Thai IOD)	Certified	-	-	-
Implement and verify that all critical Tier 1 business partners have anti-corruption policies and conducting training for business partners every quarter.	-	Training for business partners every quarter.	Training for business partners every quarter.	Training for business partners every quarter.

**Strategic Initiative**

Strategic Initiative	Year	Expected Outcomes
Creating a corruption-free organizational culture.	2026	• None of corruption.
	2027	• None of corruption.
	2028	• None of corruption.

**Risk Management**

**Risk 1**

Anti-Corruption and Bribery Enhancement Plan

**Risk Characteristic**

The potential risks arising from the implementation of the anti-corruption and bribery enhancement plan are as follows:

- Risk from nominal compliance (Paper-based Compliance): Measures are well-defined in policies but may lack actual enforcement in practice, making it unable to truly prevent corruption occurring on-site.
- Fear of Retaliation: If employees do not trust confidentiality protection measures or remedial measures, it will result in no one daring to use whistleblowing channels when witnessing misconduct.

3. Inconsistency in leadership examples (Tone from the Top Gaps): If executives or supervisors do not strictly set an example, employees will develop an attitude that policies are merely ceremonial and will reduce the importance of compliance.
4. Complexity of Corruption: Corruption may evolve into more complex network relationships or conflicts of interest, which may be difficult for normal auditing systems to detect.
5. Monitoring Gaps: For organizations with numerous branches, comprehensive and thorough oversight may have limitations, leading to risks of local corruption that the central authority cannot adequately monitor.

### **Risk Impact**

The potential impacts if corruption and bribery risks are not managed effectively are as follows:

1. Downgrade of Sustainability Rating (ESG Impact). If systemic corruption occurs or is detected later, it may result in a downgrade of the SET ESG Ratings from AAA, which would affect the confidence of institutional investors and sustainability-focused funds, who are the company's major shareholders.
2. Legal & Regulatory Penalties. Allowing corruption to occur may lead to investigations by the SEC or the Anti-Money Laundering Office (AMLO), which carry both civil and criminal penalties, and may also disqualify the company from participating in various support programs.
3. Financial Loss and Asset Quality. Corruption in the loan approval or debt collection process (e.g., accepting bribes to approve substandard loans) will directly lead to a surge in Non-Performing Loans (NPLs), significantly impacting the company's net profit and cash flow.
4. Organizational Culture Erosion. If employees perceive that wrongdoers are not punished or whistleblowers are not protected, honest employees will become demoralized, leading to the departure of quality personnel and making it more difficult to build a transparent organization in the long run.
5. Loss of Stakeholder Trust. In the leasing business, trust is paramount. If there are reports of corruption, business partners (such as various platforms or agricultural partners) may hesitate to collaborate, and customers may lose confidence in conducting transactions with the company.

### **Risk Management**

1. Measures for "Leadership and Organizational Culture" (Addressing Tone from the Top)

Integrity Dashboard & Executive KPIs: Mandate transparency as part of the Key Performance Indicators (KPIs) for senior executives and branch managers, requiring concrete quarterly reports on compliance with anti-corruption policies.

Public Pledge & Certification: Continuously push for the company to receive certification from CAC (Collective Action Against Corruption of the Thai Private Sector) and declare a "No Gift Policy" during all festive seasons, emphasizing the traditional gift acceptance criteria not to exceed 3,000 Baht as stipulated by the policy.

2. Measures for "Protection and Building Trust" (Addressing Fear of Retaliation)

Independent Reporting Platform: Develop or utilize an external whistleblower reporting system (Third-party platform) to ensure anonymity and build confidence that information will not be accessed by accused individuals within the organization.

Anti-Retaliation Guarantee: Issue a commitment statement from the Board of Directors to protect whistleblowers from harassment or unfair transfers, with the highest disciplinary penalties for those who attempt to identify or threaten whistleblowers.

3. Measures for "Technology and In-depth Monitoring" (Addressing Complexity & Monitoring Gaps)

Forensic Data Analytics: Implement AI or Data Analytics systems to detect unusual lending and debt collection behaviors (Red Flags), such as repeated loan approvals for the same group of individuals or abnormal relationships between employees and local business partners.

Surprise Compliance Audits: Establish a rapid response audit team (Mobile Audit Team) to conduct unannounced random inspections of branches, focusing on verifying document accuracy and detecting potential hidden benefits in on-site processes.

#### 4. Measures for "Area-Level Management" (Addressing Operational Gaps)

Regional Compliance Champions: Appoint "Transparency Representatives" in each region to monitor, supervise, and advise branch employees, helping to bridge the gap between headquarters and remote branches.

Conflict of Interest Cross-Check: Integrate the conflict of interest database with the operational system. If a transaction that may involve a conflict of interest occurs, the system will immediately suspend the transaction and notify the central unit for verification.

#### 5. Measures for "Transparency and Disclosure" (Addressing Paper-based Compliance)

Transparency Report: Prepare a summary report of complaints and their management (anonymously), to be published internally and in the One Report, demonstrating that policies are genuinely enforced and offenders are decisively penalized.

Standardized Procurement: Upgrade the procurement system to be fully electronic (E-Procurement) to reduce personal discretion and enhance transparency in the vendor selection process.

### Enhancing whistleblowing mechanisms

#### Enhanced Accessibility

- Maintain and Improve Existing Channels: Retain suggestion boxes, postal mail, email (whistleblower@hengleasing.co.th), hotline 1361, and the company website.
- Anonymous Reporting System: Develop a website-based system that allows whistleblowers to choose to remain anonymous if they believe disclosure would compromise their safety.
- Detail Specification: Whistleblowers are required to provide sufficient evidence and information for investigation to ensure maximum efficiency of the process.

#### Robust Protection & Confidentiality

- Confidentiality: Whistleblowing information and the personal data of the whistleblower will be kept strictly confidential and accessible only to relevant parties.
- Disciplinary Protection: Guarantee that there will be no changes in job position, workplace, intimidation, termination, or unfair treatment of whistleblowers acting in good faith.
- Compensation and Redress: Whistleblowers or related parties are entitled to protection and compensation in accordance with appropriate and fair procedures if they suffer damages.

#### Efficient & Transparent Process

- Prompt Response: The recipient must forward the matter within 3 business days from the date of notification.
- Independent Investigation: The audit committee will consider appointing an investigation committee if the matter is found to have merit.
- Clear Timeframe: The investigation committee must conduct an investigation and propose solutions to the audit committee within 30 business days.
- Reporting Results: Upon completion of the consideration, the whistleblower must be informed of the outcome, and the information must be kept confidential.

#### Whistleblowing Culture

- Organization-wide Communication: Continuously disseminate policies through the 56-1 One Report and the company website.
- Training: Include whistleblowing topics in the new employee orientation program and the annual business ethics course.
- Decisive Penalties: Disciplinary actions ranging from warnings to termination for offenders, including those who intentionally provide false information to cause harm.

### Targets

Topic	Current Status	Targets		
		2026	2027	2028
The company has established a whistleblowing policy and procedures for reporting misconduct.	Complete	-	-	-
<ul style="list-style-type: none"> <li>The company has established a formal, written whistleblowing policy and procedures, which have been approved by the Board of Directors</li> </ul>	Complete	-	-	-
<ul style="list-style-type: none"> <li>Appointment of an impartial recipient for whistleblowing reports.</li> </ul>	Complete	-	-	-
<ul style="list-style-type: none"> <li>All complaints are thoroughly investigated, and outcomes are reported to the Board in a timely manner, with appropriate corrective and preventive actions in cases of confirmed misconduct to avoid recurrence.</li> </ul>	Complete	-	-	-
<ul style="list-style-type: none"> <li>The whistleblowing policy and procedures reviewed by the Board of Directors at least annually.</li> </ul>	Complete	-	-	-
Reduce the complaint resolution time.	-	Completed in 15 Days	Completed in 15 Days	Completed in 15 Days

**Strategic Initiative**

Strategic Initiative	Year	Expected Outcomes
Strategies to enhance whistleblowing processing.	2026	<ul style="list-style-type: none"> <li>Faster processing.</li> </ul>

**Risk Management**

**Risk 1**

Potential risks from the implementation of an enhanced plan for reporting misconduct.

**Risk Characteristic**

The potential risks that may arise from implementing an enhanced Whistleblowing plan within an organization are as follows:

**Confidentiality Risk:** If personal information of whistleblowers is leaked, whether intentionally or due to system error, it will severely erode the trust of employees and stakeholders, rendering this channel unusable in the future.

**Retaliation Risk:** Despite protection policies, in practice, whistleblowers may face harassment in forms that are difficult to verify, such as social exclusion at work, unfair performance evaluations, or pressure from supervisors, which affects employee morale and spirit.

**Malicious Reporting Risk:** This channel may be used as a tool to attack or harass colleagues or supervisors with false information, to damage the reputation of others or for personal gain.

**Investigation Capacity Risk:** If the investigation process is delayed, lacks independence, or investigators lack the skills to uncover facts, whistleblowing will not lead to the resolution of actual problems, and offenders may become aware of the investigation.

Inaction Risk: If whistleblowers do not see changes or concrete punishment for offenders, a negative attitude will arise, believing that reporting will not improve anything, which will destroy the organization's culture of transparency in the long run.  
Information Gap Risk: In cases of anonymous whistleblowing, if the whistleblower provides insufficient information and the working committee cannot contact them for further details, the investigation may have to be terminated without a conclusion.

### **Risk Impact**

If the risks associated with the whistleblowing system are not managed appropriately, it will affect the company in various aspects as follows:

#### 1. Impacts on Trust and Sustainability Rating (ESG & Reputation)

Loss of ESG score: If a scandal occurs regarding the leakage of whistleblower information, it will directly impact the company's AAA SET ESG Ratings, which is a crucial strength for attracting investors.

Crisis of confidence: All stakeholder groups will lose trust in the company's governance, severely damaging the organization's image of "transparency."

#### 2. Financial and Asset Quality Impacts (Financial & Asset Quality)

Increase in Non-Performing Loans (NPLs): If the whistleblowing system fails to prevent corruption in the loan approval process, it will lead to an increase in bad debts.

Increased operational costs: Inefficient investigations or false whistleblowing for harassment purposes will cause the company to waste resources and management time unnecessarily.

#### 3. Legal and Regulatory Impacts (Legal & Regulatory)

Punishment from regulatory bodies: Failure to maintain confidentiality or protect whistleblower rights may lead to the company being found in violation of the Personal Data Protection Act (PDPA) or regulations of the Securities and Exchange Commission (SEC).

Risk of lawsuits: Individuals who have been treated unfairly or threatened due to whistleblowing may file lawsuits to claim damages from the company.

#### 4. Impacts on Organizational Culture and Human Resources (Internal Culture & Talent)

Honest employees will lose morale and motivation when they see that wrongdoing goes unpunished or that those who do good are not protected, leading to the resignation of quality personnel. Furthermore, if the whistleblowing channel is used for harassment, it will create distrust and destroy team cohesion.

### **Risk Management**

#### 1. Technology and Data Security Measures (Addressing Confidentiality Risk)

Encrypted Reporting System: Utilize an information system with advanced data encryption to prevent unauthorized access by external parties.

Access Restriction: Grant access rights only to directly responsible personnel to view the details of complaints, in order to maintain the privacy of whistleblowers.

Anonymous Communication Channel: Develop a channel where whistleblowers can communicate interactively with the working committee without revealing their identity (Two-way Anonymous Communication) to help address issues of insufficient information.

#### 2. Whistleblower Protection Measures (Addressing Retaliation Risk)

Concrete Protection Policy: Establish regulations strictly prohibiting changes in job position, workplace, intimidation, or termination of whistleblowers acting in good faith.

Post-Reporting Monitoring: Establish a system for periodically monitoring the employment status and performance evaluation history of whistleblowers to ensure they are not subjected to unfair treatment.

Penalties for Harassment: Impose the highest disciplinary penalties for those who attempt to identify or harass whistleblowers.

### 3. Investigation Process Measures (Addressing Investigation & Malicious Reporting Risk)

Independent Investigation Committee: Appoint an investigation committee that is impartial and has no vested interest in the reported matter to ensure fair consideration.

Clear Timeframe Definition: Enforce a clear timeframe for investigation and conclusion within 30 business days to prevent delays and interference.

False Information Screening Measures: Impose disciplinary penalties for those who intentionally provide false information to harass others, in order to maintain the credibility of the system.

### 4. Measures to Build Trust and Transparency (Addressing Inaction & ESG Impact)

Statistical Reporting of Results: Summarize the number of complaints and their management to the Board of Directors and publish them via the 56-1 One Report to demonstrate transparency.

Policy Reinforcement Communication: Develop public relations materials and annual training courses to ensure employees at all levels understand the rights and protections provided by the company.

Linkage with ESG Standards: Maintain whistleblower reporting standards in line with SET ESG Ratings criteria to preserve the AAA rating and build investor confidence.

## Enhancing the prevention of insider information

### 1. Awareness & Training

The best prevention begins with fostering a correct understanding among personnel at all levels:

Deep-dive Training: Provide training to directors, executives, and employees in accounting and finance regarding their duties to report securities holdings under Section 59 and the penalties stipulated by the Securities and Exchange Act.

Orientation and Acknowledgment: New directors and executives are required to acknowledge their reporting duties and sign an acknowledgment of the operational regulations concerning the use of inside information from their first day in office.

Reminder Communication: Regularly issue internal circulars notifying employees in advance about the securities trading blackout period.

### 2. Information Access Control

Restrict information to a "Need-to-Know Basis":

Chinese Walls: Restrict access to non-public information by implementing security systems to prevent material information from leaking to unrelated individuals, both internal and external to the organization.

Physical and Digital Security Systems: Utilize data encryption and restrict individual access rights in critical database systems to enable identification and tracking of data usage retrospectively.

### 3. Trading & Blackout Monitoring Measures

Intensify oversight during high-risk periods:

Enforcement of Blackout Period: Directors, executives, and employees with access to inside information are prohibited from buying or selling securities during the 1-month period prior to the disclosure of financial statements, and should wait at least 24-48 hours after the information has been publicly disclosed.

Pre-trade Notification System: Directors and executives are required to notify the Company Secretary of their intention to buy or sell securities at least 1 business day in advance of the actual transaction.

Prompt Reporting: Require reporting of changes in securities holdings to the Company Secretary within 3 business days, and report to the Board of Directors' meeting for acknowledgment every quarter.

4. Enforcement & Accountability

Establish stringent monitoring systems to prevent violations:

Independent Audit: The Corporate Governance (Compliance) department, in conjunction with the Company Secretary, shall periodically review securities trading activities of individuals with access to inside information to ensure no violations occur during the Blackout Period.

Clear Penalties: Implement disciplinary actions from the date of discovery, ranging from warnings to termination without compensation, if inside information is found to have been used for personal gain or for the benefit of others.

Transparent Disclosure: Summarize the number of holdings and changes in securities by directors and executives in Form 56-1

One Report to demonstrate transparency to the public.

**Targets**

Topic	Current Status	Targets		
		2026	2027	2028
The company has established a policy and procedures to prevent the misuse of insider information.	Complete	-	-	-
<ul style="list-style-type: none"> <li>A Board-approved written policy on insider information prevention has been clearly defined and implemented</li> </ul>	Complete	-	-	-
<ul style="list-style-type: none"> <li>A structured process is implemented to regularly monitor and review compliance with the insider trading prevention policy,with audits conducted at least annually.</li> </ul>	Complete	-	-	-
<ul style="list-style-type: none"> <li>The implementation of the insider information prevention policy is reviewed and reported to the Board of Directors at least annually. If any violations are detected,corrective actions and preventive measures are clearly outlined to prevent recurrence</li> </ul>	Complete	-	-	-
Internally disclose,on a per-transaction basis,the list of individuals who have access to inside information regarding any transaction that may affect the company's stock price and investor decisions.	-	Quarterly	Quarterly	Quarterly

**Strategic Initiative**

Strategic Initiative	Year	Expected Outcomes
Strategies to enhance prevent the misuse of insider information.	2026	• None of used Inside information case
	2027	• None of used Inside information case

Strategic Initiative	Year	Expected Outcomes
	2028	<ul style="list-style-type: none"> <li>• None of used Inside information case</li> </ul>

**Risk Management**

**Risk 1**

Plan to enhance the prevention of internal information use

**Risk Characteristic**

Potential risks that may arise from implementing the enhanced conflict of interest prevention plan are as follows:

Operational Gap: Due to the company's extensive branch structure, communicating and ensuring that all employees strictly understand and adhere to the same standards may be challenging.

Culture of Silence: Employees or executives may be concerned about personal relationships or deference, leading to reluctance in fully disclosing the names of related parties.

Identification Complexity: Legal requirements are complex. If the database system is not updated in real-time, errors may occur in screening items that fall under conflicts of interest.

Administrative Burden: Increased reporting procedures may be perceived as a burden, leading to delays in business operations or causing data entry to lack detail and not reflect reality.

System Limitation: If the IT system does not effectively support cross-checking of data, the proactive audit plan may only exist in name but lack practical depth in actual implementation.

**Risk Impact**

The potential impacts if these risks materialize can be divided into 5 main areas, as follows:

1. Loss of Credibility and Sustainability Rating (Reputation & ESG Impact). If an unverified conflict of interest occurs, it will directly impact the company's image as a "sustainable stock" and may lead to a downgrade of its SET ESG Ratings from AAA. This is a crucial factor that institutional investors and funds consider when making investment decisions. Losing this position will severely damage the credibility that has been built.
2. Regulatory Sanctions. Conducting related-party transactions without transparency or failing to comply with the disclosure criteria of the SEC and the Stock Exchange of Thailand may lead to fines, reprimands from regulatory bodies, or, in severe cases, affect the qualifications of directors and executives. This would impact the company's status in the JUMP+ project, which aims to enhance corporate governance.
3. Financial & Shareholder Loss. If business decisions are distorted to benefit cronies (e.g., procurement at inflated prices or providing loans to related parties without proper quality assessment), it will lead to higher company costs or an increase in non-performing loans. This will affect net profit and exploit minority shareholders who expect fair returns.
4. Decreased Operational Efficiency & Agility. The impact of "documentary burden" and "complex procedures" may delay business decision-making processes. If employees feel that the audit system merely creates workload but cannot genuinely prevent problems, a "tick-the-box" phenomenon will occur, where tasks are performed as a duty but lack qualitative diligence. This contradicts the plan to emphasize loan quality and efficient debt collection.
5. Internal Culture Erosion. If operational staff perceive that personal connections can override the system, it will lead to behavioral imitation or cause diligent employees to lose morale and motivation. This will result in the loss of talented personnel (Brain Drain) and make it more difficult to foster an anti-corruption culture in the future.

## Risk Management

To ensure that the plan for enhancing the prevention of conflicts of interest can be effectively implemented and mitigate the aforementioned risks, management measures should be divided into 4 main areas as follows:

1. Utilizing Technology and Automation (Digitalization & Automation) to reduce workload and enhance screening accuracy:

**Automated Red-flag System:** Integrate the Related Person Database with the credit approval system and Enterprise Resource Planning (ERP) procurement system. If a transaction is made with an individual or legal entity with a conflict of interest, the system will immediately issue an alert and suspend the transaction pending central review.

**User-friendly Reporting Platform:** Develop the UI/UX of the conflict of interest reporting system to be easy to use, with clear definitional explanations at each step, and support mobile transactions, to reduce the perception of it being a burdensome paperwork task.

2. Localized Governance to close enforcement gaps at the branch level:

**Regional Compliance Ambassadors:** Appoint executive-level employees in each area to serve as compliance representatives, acting as consultants and conducting initial checks for branches, thereby reducing confusion regarding definitions and the complexity of legal criteria.

**Case-based Learning Training:** Instead of theoretical training, use real-life simulated scenarios at the branch level (e.g., relationships with local agents or employees who are relatives of customers) to help employees visualize and understand correct management methods.

3. Fostering a Culture of Integrity to break down barriers of information concealment and deference:

**Safe Disclosure Incentives:** Publicly commend employees or departments that transparently and consistently report conflicts of interest, to foster the attitude that "disclosure protects the company and oneself," rather than being a wrongdoing.

**Non-Retaliation Policy:** Strongly communicate that reporting whistleblowing or disclosing relationships will not affect career advancement, along with having the highest level of confidentiality procedures.

4. Independent Oversight for transparency in the final stage:

**Data Mining Audit:** The internal audit department should utilize Data Analytics technology to randomly check for potentially hidden relationships between employees and contractors (e.g., using the same address or related bank account numbers), which might be missed through verbal reporting.

**Direct Reporting to the Audit Committee:** Summarize high-risk items or cases of information concealment for reporting to the Audit Committee and consider clear penalties as stipulated in the business ethics code.