

Wave Entertainment Public Company Limited

Whistleblower Procedures

Purpose of the Whistleblower Procedures

The Whistleblower Procedures establish a procedure for all employees of Wave Entertainment Public Company Limited (the “Company”) to submit complaints or concerns (a “Complaint”) relating to any potential unethical or unlawful behaviour, financial improprieties or to report perceived violations of law or the Company’s policy.

The aim of these procedures is to ensure that all employees are confident that they can raise any matters causing them concern, with the knowledge that it would be taken seriously, be dealt with in the strictest confidence, and be acted upon without any fear of possible reprisals. Employees are therefore encouraged to submit their Complaints.

These procedures apply to all employees of the Company including permanent, contract and temporary employees.

Confidentiality

The Company will take all reasonable steps to safeguard the identity of the whistleblower.

All Complaints shall be treated as confidential. All investigations will be conducted in a confidential manner, so that information will be disclosed only as needed to facilitate the investigation or otherwise as required by law.

Any employee who makes a Complaint in good faith should not have fear of reprisals.

Procedures

The details of how a Complaint can be made and how it will be handled are set forth below.

- (A) Submission of a Complaint
- (i) Employees are free to submit their Complaints confidentially in writing or in person, through letters, e-mails or telephone calls; or anonymously by internal or regular mail.
 - (ii) Employees are free to submit their Complaints to any of the following persons:
 - (a) Chief Executive Officer;
 - (b) Company Secretary;
 - (c) Head of IR, Secretariat & Compliance; or
 - (d) Head of Human Resources & Admin;
 - (iii) If the Complaint concerns any of the above persons, employees may make their Complaint to a higher level (e.g. Chairman of the Audit Committee).
 - (iv) If the Complaint concerns financial improprieties (such as questionable accounting, internal accounting controls or auditing matters), employees may make their Complaint directly to the Chairman of the Audit Committee.
- (B) Action To be Taken
- (i) Before the person who receives the Complaint decides to proceed with the matter under this Whistleblower Procedures, he would reconfirm with the employee that his identity is not to be disclosed.
 - (ii) Upon confirmation of the employee, the person who received the Complaint shall take down the statement from the employee. To safeguard the confidentiality of the identity of the employee, the statement shall remain in the custody of the person who received the Complaint.
 - (iii) In the event where an anonymous Complaint is received, the investigation of the Complaint will be carried out based on the information or documentation provided by the employee. In cases where there is insufficient information or documentation provided, it may not be possible to proceed with or properly conduct an investigation.

- (iv) The person who received the Complaint must notify Head of IR, Secretariat & Compliance immediately that a Complaint has been made to enable the Compliance to maintain a log of all Complaints made under this procedure. The person who received the Complaint must also notify the Head of Human Resources & Admin or Company Secretary that a Complaint has been made, unless the Complaint concerns the Human Resources & Admin Department or Company Secretary.
- (v) The person who received the Complaint, in consultation with the Chief Executive Officer (however, if the Complaint involves financial improprieties of the Chief Executive Officer, then Chairman of Audit Committee should be consulted instead of the Chief Executive Officer), would:
 - (a) Assign a Review Team to review and investigate the Complaint
 - (b) Oversee the progress of the conduct of the investigation by the Review Team
 - (c) Determine a plan of action
- (vi) Once the investigation and evaluation of the Complaint has been completed, the Review Team shall report to the Chief Executive Officer or Chairman of the Audit Committee (in cases where the Complaint relates to financial improprieties of the Chief Executive Officer or where Complaint is made directly to the Audit Committee) on the results of its findings, the recommended plan of action and (where appropriate) the recommended disciplinary or remedial action, if any.
- (vii) The action determined by the Chief Executive Officer or the Chairman of the Audit Committee to be appropriate under the circumstance shall, where deems necessary by the Chief Executive Officer or the Chairman of the Audit Committee, be brought to the Board for authorization or implementation.
- (viii) The employee who made the report will be kept informed of the final outcome of the matter.
- (ix) Reasonable and necessary steps will also be taken to improve the processes (if necessary) to prevent any improper conduct from occurring in future or to prevent any further violations of the Company's policy.

The Board of Directors, management and employees must understand and follow this Whistleblower policy in order to achieve the Company's goals and objectives which effective since 3rd December 2014 onwards.

Board of Directors Approved on December 3, 2014.
Last Updated on November 13, 2017.