

CENTRALPATTANA

Data Recording, Reporting and Retention Policy

Central Pattana Public Company Limited

1. Introduction

Data recording, reporting and retention are critical processes that significantly influence the operations and credibility of Central Pattana Public Company Limited and its subsidiaries (the "Company"). Inadequate data management or improper retention practices can lead to business losses, legal risks and erosion of stakeholder trust, with long-term reputational consequences.

The Company is committed to operating with transparency and in accordance with principles of good governance, by ensuring that data is managed accurately, comprehensively and in line with international standards. This includes adherence to applicable laws and regulations, such as the Personal Data Protection Act (PDPA), and internationally recognized frameworks such as ISO 27001.

The Company also recognizes the importance of protecting personal data, safeguarding sensitive information and establishing transparent and auditable reporting processes to strengthen confidence among shareholders, investors and stakeholders. These practices demonstrate the Company's commitment to sustainable development and long-term value creation for all stakeholders.

2. Scope

This Policy applies to all Company personnel at all levels, including permanent and temporary employees, executives, suppliers and other relevant parties who are assigned or granted access to Company data. It covers the recording and reporting of financial information, operational data and information relating to all stakeholders. All personnel must comply with applicable laws, regulations and standards, such as the PDPA, accounting laws, and financial reporting requirements, as well as the good governance principles and ethical conduct standards defined in the Company's Code of Conduct.

This scope of this Policy also includes the storage, protection and management of confidential, personal and sensitive data belonging to the Company and its suppliers, with the objective of preventing unauthorized access, modification or misuse.

3. Objectives

- To ensure that all data recording and reporting activities are accurate, complete, transparent and auditable, in accordance with international standards
- To prevent unauthorized access, modification or misuse of data, and to protect the personal data of customers, suppliers and stakeholders in compliance with applicable laws and standards
- To enable the Company to operate ethically and in compliance with relevant laws, regulations and governance standards
- To build stakeholder confidence in the integrity and security of information managed by the Company, laying the foundation for reliable and sustainable data management in line with the Company's sustainability goals and its commitment to creating long-term value for society and the environment

4. Roles and Responsibilities

To ensure this Policy is effectively implemented across all levels of the organization with clear oversight and accountability, the Company has defined the roles and responsibilities of relevant individuals and functions as follows:

4.1 Board of Directors

- Approve and review this Policy to ensure it alignment with the nature of the Company's business and evolving conditions

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- Oversee and monitor operations to ensure alignment with this Policy, international standards and legal requirements, such as the Personal Data Protection Act (PDPA)
- Review data-related performance reports and provide guidance in cases of identified risks or issues

4.2 Senior Management

- Allocate appropriate resources, including personnel, technology and budget, to support effective data management operations
- Establish clear data-related targets and measures to ensure transparency and accountability in implementation
- Report performance and key challenges related to data management to the Board or relevant sub-committees on a periodic basis

4.3 Risk Management

- Assess and monitor risks related to data recording, reporting and retention, including the potential consequences of data management failures
- Review and update data-related risk mitigation measures to ensure they remain appropriate to evolving business and technology conditions

4.4 Employees

- Comply strictly with the Company's policies and guidelines on data recording, reporting and retention
- Use only Company-approved resources and technologies for data management
- Report any policy breaches or actions that may compromise data integrity or security

5. Policy and Practices

- 5.1) Employees must record financial, operational and stakeholder-related data accurately, completely and in a timely manner, in accordance with Company requirements and applicable laws. All data recorded must also be reviewed for accuracy to prevent errors.
- 5.2) Information reported by employees must be accurate, clear and truthful. Concealment or misrepresentation of data that could cause misunderstanding or business impact is strictly prohibited.
- 5.3) The Company must store data in systems with the highest level of security, with clearly defined access controls to prevent unauthorized access and protect sensitive and personal information.
- 5.4) Employees must not use internal Company data not yet publicly disclosed for personal gain or to benefit third parties. All data handling must comply strictly with the Company's approved procedures.
- 5.5) Disclosure of critical Company information must be authorized. Disclosure by unauthorized personnel is prohibited.
- 5.6) Any third party granted access to Company confidential information must sign a Confidentiality Agreement to ensure that such information is not misused or improperly disclosed.
- 5.7) Employees must report any suspected breaches of this Policy, including any action that could result in harm to the Company's data.
- 5.8) System owners are responsible for establishing and maintaining backup systems and recovery procedures to ensure business continuity in the event of an emergency. These systems and procedures must be regularly tested.
- 5.9) System owners must provide training and promote awareness of data management, personal data protection and data security across all levels of the organization.
- 5.10) System owners must review this Policy at least annually, or as needed, to ensure alignment with changes in applicable laws and the business environment.

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6. Training

The Company is committed to building knowledge and communicating this Policy across the Board of Directors, management and employees at all levels. This is achieved through a variety of activities, such as training sessions, meetings and workshops. Content is tailored to the Company's operational context and sustainability approach, with the aim of strengthening understanding and practical skills for effective implementation. The Company also regularly monitors and evaluates how this Policy is communicated to ensure it effectively supports the achievement of the Company's sustainability goals.

7. Complaints and Whistleblowing

The Company provides all employees and stakeholders with the opportunity to raise complaints or report suspected breaches of this Policy. All reports will be handled in accordance with the Company's Whistleblowing Policy. The Company guarantees the protection of complainants' rights, safety and confidentiality and ensures they are not subject to any adverse impacts on their employment throughout the investigation process. The Company places strong emphasis on transparency and is committed to fostering an organizational culture of accountability and integrity across all aspects of its operations.

8. Disciplinary Action

The Company affirms the importance of strict compliance with this Policy. All employees are required to fully cooperate with any reviews or investigations into potential policy breaches. Where non-compliance or violations are identified, disciplinary action will be taken in accordance with the Company's internal regulations. This approach supports the establishment of transparent and sustainable operational standards and ensures alignment with the Company's values and long-term sustainability goals.

9. Policy Review and Update

This Policy will be reviewed and updated at least annually, or when there are changes in applicable laws, regulations or sustainability standards at the national or international level. The review process ensures the Policy remains relevant, effective and responsive to evolving business contexts. The Company is also committed to continuously improving its approach and practices to meet stakeholder needs and support long-term organizational performance.

This Policy is effective from May 2, 2025 onward.