

Anti-Corruption Policy

The Company and subsidiaries are committed to conducting business with honesty, transparency, and in accordance with good corporate governance principles. Anti-corruption is considered one of the Code of Best Practices under the Company's Business Ethics and Code of Conduct. The Company is aware that corruption is a significant obstacle to the country's development. Therefore, the Company has developed an anti-corruption policy which is considered part of the Company's Anti-Corruption Policy.

Objectives

1. To determine the guidelines and operational procedures in line with the anti-corruption policy.
2. To ensure that business decisions and actions that may involve corruption risks are carefully considered and practiced.

Scope of enforcement

1. The policy includes practices, manuals on anti-corruption, and other related documents to support current and future policy implementation.
2. The policy applies to the Company's directors, executives, and employees, as well as stakeholders of the Company's business, including customers, partners, creditors, debtors, private sector entities, public sector entities, state enterprises, including legal entities and related persons.

Definitions

"Corruption"

refers to the act of offering, requesting, or receiving any cash, items, or other benefits to the state sector, private sector, legal entity, or any individual to induce the act or omission or condone improper acts by duty, with the intention to unfairly gain a competitive advantage or to benefit oneself or others improperly, which may include various forms of actions as follows:

"Bribery"

refers to the proposition, promise, giving, receiving, or demanding of benefits, where bribery may be concealed in the form of charitable contributions, sponsorships, giving or receiving gifts, hospitality, or facilitation payments.

"Political Contribution"

refers to providing political support, whether financially, encouraging employees to participate in political activities on behalf of the Company, including any other activities on behalf of the Company, to support political parties, politicians, or related political individuals, either directly or indirectly, with the intention to obtain special privileges or benefits. This does not include employees participating in political activities according to the principle of freedom.

"Charitable Contribution"

refers to the donation of money, goods, or any other benefits to the state, customers, partners, legal entities, or any other persons, with the purpose of obtaining special privileges or inappropriate benefits, unless it is carried out for the public interest without expecting anything in return, such as supporting community organizations, associations, foundations, public organizations, temples, hospitals, schools, or organizations that benefit society.

"Sponsorships"

refers to money paid or received from the state, customers, partners, legal entities, or any other persons, with the purpose of obtaining special privileges or inappropriate benefits, except for sponsorships for the public interest or to promote the Company's brand or reputation, which benefits building trust in commerce or fostering appropriate business relationships.

"Hospitality"

refers to various expenses that have financial value, paid for anything, including things that replace cash and things that can be exchanged for goods or services with an excessive value, with the purpose of obtaining special privileges or inappropriate benefits.

"Government Interaction"

refers to actions where the Company must have a relationship with government officials, with the purpose of obtaining special privileges or inappropriate benefits.

"Economic Extortion"

refers to the demand or being demanded money, goods, or any other benefits from state agencies or the private sector, with the purpose of obtaining special privileges or inappropriate benefits.

"Facilitation Payment"

refers to giving cash, goods, or anything else to government officials or private entities, with the purpose of facilitating operations for the Company.

"Procurement"

refers to the purchase of assets, office supplies, including the hiring of services for the Company, with the purpose of obtaining benefits that should not be obtained.

"Revolving Door"

refers to the practice where individuals from the public sector come to work in the Company, or employees of the Company participate in public policy activities. This may lead to conflicts of interest between the roles and responsibilities in both organizations, resulting in biased oversight by government officials, or the Company's employees trying to influence state policies to favor the Company.

"Conflict of Interest"

refers to a situation where board members, executives, or employees engage in transactions related to the Company with the purpose of gaining personal benefits from the Company's operations, conflicting with the Company's interests.

"Private-to-Private Bribery"

refers to corruption between the Company and customers or partners, whether committed by the Company, customers, or partners, with the intention to obtain undue special privileges or benefits.

Duties and Responsibilities

Company Board of Directors

- (1) Establishing policy, considering laws, regulations, and good corporate governance principles
- (2) Allocating sufficient resources for policy implementation.
- (3) Supervising, monitoring the adequacy of policies, and measures accompanying policy implementation to ensure that the management is aware of and emphasizes combating corruption, and inculcates this as an organizational culture.

Audit Committee

- (1) Providing opinions to the Company's board of directors concerning the adequacy of policies and measures accompanying actions according to anti-corruption policy.
- (2) (2) Evaluating the adequacy of internal controls, financial reporting, and other processes related to anti-corruption measures.

Risk Management Committee

Monitoring the status of risks and the implementation of risk management measures in fraud and deception, including the adequacy and appropriateness of existing measures. In this regard, corruption risks are considered a part of the risks of fraud and deception.

Company Secretary

Serving as the center for communicating policies and accompanying measures, as well as results, to investors and external parties.

Internal Audit Department

The Internal Audit Department is responsible for auditing, reviewing compliance with policies, and reporting audit results according to the policies to the Audit Committee.

Any department within the Company that is assigned to be responsible for implementing policy measures.

- (1) Develop and revise measures for implementing policies as assigned.

- (2) Plan and propose resource requirements to support policy implementation.
- (3) Communicate policies and measures for policy implementation to executives and employees.
- (4) Supervise, monitor compliance with policies and measures for policy implementation.
- (5) Evaluate the performance according to the policies and measures for policy implementation and report to the Risk Management Committee and Audit Committee.

Executives and Employees

Understand and comply with the Company's policies.

Anti-Corruption Policy Guidelines

- (1) Directors, executives, and employees will not engage in corruption or illegal activities, whether directly or indirectly
- (2) All directors, executives, and employees must strictly adhere to good corporate governance principles, business ethics, code of conduct, the Company's regulations, and authority to act, as well as any relevant policies, measures, rules, guidelines, or procedures.
- (3) The Company has established sufficient and appropriate measures, regulations, guidelines, or procedures to comply with the anti-corruption policy and communicated them to related parties to ensure they understand and comply with them properly.
- (4) The Company has rules for assessing and selecting business partners and contracts. Business partners and contracts are selected based on their responsibility, integrity, honesty, and free from any involvement in any form of corruption.
- (5) The Company complies with laws, regulations, and rules prescribed by relevant regulatory bodies and government agencies, as well as collaborates and coordinates on matters related to good corporate governance, including anti-corruption.
- (6) The following operations may pose risks of corruption and could affect the Company's reputation. Therefore, executives and employees must strictly adhere to the policy as follows:

Political Contributions

The Company encourages all employees to maintain political neutrality and refrain from providing support or engaging in actions that promote political parties, both directly and indirectly. This includes the use of Company resources for activities that may compromise the Company's political neutrality and/or cause damage from involvement in such activities.

Charitable Contribution

The Company supports the control of charitable donations, adhering to the principle that donations must benefit the common benefits and/or be free from suspicion of being part of a corrupt practice. Senior management is required to approve the transaction and reliable documentary evidence is kept for verification purposes regarding the purpose of the donation. The Company does not have a policy to accept donations from third parties.

Sponsorships

The Company has guidelines for providing or receiving sponsorship funds, which must benefit the normal business activities of the company and not be for the benefit of any individual or raise suspicion of being part of a corrupt practice. Senior management is required to approve the transaction and reliable documentary evidence is kept for verification purposes regarding the purpose of the sponsorship.

Hospitality

The Company has a policy for providing or receiving gifts and hospitality. Hospitality expenses must be reasonable and appropriate according to cultural and customary practices. The Company does not have a policy for providing or receiving high-value gifts beyond what is deemed reasonable, in order to avoid inducing recipients to act or fail to act in the performance of their duties, which could lead to corruption.

Government Interaction

The Company provides appropriate entertainment for government officials and only gives gifts in accordance with etiquette or business customs. However, no cash is given. The senior executives are required to approve transactions according to their authority.

Economic Extortion

The Company has a policy of not paying for economic benefits demanded through threats or coercion by government officials or private parties.

Facilitation Payment

The Company has a policy of not making any facilitation payments to either government officials or private parties and considers it a prohibited act.

Procurement

The Company has regulations for controlling the procurement system and must follow the Company's procedures, which are transparent and auditable. Specific departments are responsible for the procurement process

Revolving Door

The Company allows the hiring of government officials or state employees if necessary to support or provide guidance for business operations. In case where the Company's employees must participate in government policy work. However, this must not conflict with anti-corruption policies and measures and should not seek to gain unfair advantages for the business.

Conflict of Interest

The Company requires the directors, executives, and employees to follow the policy on disclosure of interests and conflicts of interest and good corporate governance policy.

- (7) The Company communicates the anti-corruption policies and measures, and the policy and practice to address complaints, protect whistleblowers, and channels for receiving complaints or whistleblowing to the Company's personnel and subsidiaries through various means, including meetings of the Company's Board of Directors, employee orientation, training sessions, public relation through email etc.
- (8) The Company communicates the anti-corruption policies and measures, and the policy and practice to address complaints, protect whistleblowers, and channels for receiving complaints or whistleblowing to investors and third parties through various means, including public relation on the Company's website, annual reports, and letters to partners etc.
- (9) The Company has a personnel management process that reflects the commitment to anti-corruption policies and measures, starting from employee recruitment, training, performance evaluation, compensation, promotion, and organizational structure, which is designed to ensure proper job segregation and balance checks. The Company also allocates resources and personnel with adequate skills to implement the policies effectively.
- (10) The Company has an internal control system covering financial management, accounting, data recording, and other processes within the Company related to the anti-corruption measures. The Company communicates the results of the internal control system to the management and responsible personnel.
- (11) The Risk Management Committee holds regular meetings to monitor the progress of the Company's main risk management activities quarterly. The anti-corruption risk is considered part of the Company's corruption and fraud risk.
- (12) The Company conducts internal audits covering key business activities such as entering into a contract and expense in support of a contract and procurement etc. to ensure the effectiveness and efficiency of the internal control systems, provide recommendations for improving the Company's systems and processes. In the event that an audit result suggests any significant issues that may adversely affect the Company, the findings will be reported to the Chief Executive Officer and the Audit Committee for urgent action and further reporting to the Board of Directors.
- (13) (13) The directors, executives, and employees shall not ignore or be indifferent when they witness or have doubts about any actions that violate the principles of good corporate governance or business ethics and integrity of the Company, including fraud and corruption. They are required to report such incidents to the channels designated by the Company and cooperate in verifying the facts.
- (14) The directors, executives, and employees who report incidents to the channels designated by the Company shall be protected, not punished, and not negatively affected, even if the Company suffers a loss of business opportunities due to such actions. The Company has established policies and measures to support the reporting and protection of whistleblowers.

- (15) Corruption by the directors, executives, or employees is a severe violation of business ethics and code of conduct and must be subject to disciplinary action according to the Company's rules and regulations and/or prosecuted if it is a violation of the law.
- (16) Conduct training on anti-corruption policies and measures for new employees during the orientation of new employees of the Company and the associated companies.

Data Storage

The Company emphasizes data storage and information systems by defining policies to maintain the security of data and information systems, in compliance with good internal controls. Actions will be taken to ensure that data and information systems, encompassing all computer systems, all network systems, all operating systems, and all applications are protected and ready to use at all times. Details can be found in the Information Security Policy.

Consultation

When employees need help in resolving conflicts, they can seek advice directly from their supervisor or higher-level management or express their opinions through the employee channel for expressing opinions or reporting misconduct as specified.

Employees who have doubts or may be in ambiguous situations and need to make a decision should ask themselves the following questions:

- Is the act legal?
- Is the act in compliance with the company's rules, policies, or practices?
- Do I have the authority to make the decision?

If there are still doubts about the answers to these questions, employees can consult directly with their supervisors, the Human Resources Department, Internal Audit Department, or Compliance Department.

Company Employees and Anti-Corruption Measures

The Company places importance on anti-corruption efforts. Thus, the hiring and training of the Company's personnel is carried out as follows:

- (1) The Company organizes a procedure for recruiting, interviewing, selecting, and hiring employees to ensure that none of the selected candidates have been involved in corruption or deception. The recruitment and selection procedure is in place and adapted to the circumstances.
- (2) The Company provides training and disseminates information to ensure that the employees understand the essence of the law, as well as the standards, measures, or guidelines set by the Company for relevant tasks. Employees must always comply with the laws, standards, measures, or guidelines.

Every employee must adhere to good governance principles, business ethics and code of conduct, company rules and regulations, and authority, as well as any related company policies, measures, procedures, and guidelines rigorously. Compliance with these various policies serves as a significant indicator in evaluating the business management performance of the Company's Board of Directors, executives, and the performance assessment of all employees.

Whistleblowing System

The Company has measures to receive complaints and protect whistleblowers or those who report corruption, fraud, misconduct, as well as violations of laws and business ethics of the Company, or cases where the Company treats them unfairly. Specific channels for whistleblowing, complaints, protection measures for complainants or whistleblowers, and fact-finding procedures for further investigation are outlined in the policy on the care of complaints, misconduct reporting, and informant protection.

Protection of Whistleblowers and How to Protect Employees who Reject Corruption

The Company protects the rights of complainants and informants acting in good faith by keeping their names, addresses, or any information confidential. Disclosure of information to unauthorized parties is prohibited unless required by law, court order, or supervisory agency.

For the Company employees who perform their duties honestly, transparently, refuse corruption, and adhere to the anti-corruption policy, they will be protected, not penalized, and will not suffer negative impacts from their commitment to this policy, even if their actions may result in lost business opportunities for the Company. More details can be found in the policy on the care of complaints, misconduct reporting, and informant protection.

Internal Control

The Company's Board of Directors evaluates the adequacy of the Company's internal control system annually, considering the assessment results reported by the Audit Committee. This evaluation follows the guidelines of COSO (The Committee of Sponsoring Organizations of the Treadway Commission) and covers various aspects, divided into five parts: organizational and environmental, risk management, executive performance control, information and communication systems, and monitoring systems.

The Company has appropriate and sufficient components of internal control, prepared, maintained, and reviewed regularly. The financial, operational, and supervisory controls are consistently monitored, and duties are segregated among operators, monitors, and evaluators to ensure appropriate balance and cross-checking. The powers and duties of managers and operators at different levels are clearly defined in writing, encompassing transactions that may lead to conflicts of interest between them. Risks in various areas are identified and assessed, and measures to prevent and manage risks are defined explicitly, including risks from corruption. Compliance with laws and regulations is also supervised through regular reporting on legal compliance and regulations to the Audit Committee at each quarterly meeting.

Furthermore, care is taken to ensure that the Company discloses significant information accurately, completely, and timely, following the criteria of the Stock Exchange of Thailand and the Office of the Securities and Exchange Commission (SEC).

Policy Review and Monitoring

The Company arranges an annual review of anti-corruption measures and ensures regular reviews of compliance with these anti-corruption measures.