

Anti-Fraud Policy

1. Objectives

BlueVenture Group Public Company Limited (“Company”) and its affiliated companies are committed to conducting business under ethical and transparent principles. We are aware of the importance of opposing all forms of fraud, both direct and indirect, whether monetary or non-monetary. It is the principle and responsibility of all employees and management at all levels to perform their duties ethically, be good citizens, and be mindful in opposing fraud. This is to prevent fraudulent activities, including giving and receiving bribes, as well as placing importance on fostering awareness, values, ethics, and strong morality, building a corporate culture where everyone is aware of the harm of fraud and corruption, and enhancing confidence among all stakeholders, ensures effective opposition to fraud and corruption and enhances Thailand's reputation for transparency to international standards.

1. To establish practices and procedures in line with anti-fraud policies.
2. To ensure business decisions and actions that may involve corruption risk are considered and carried out meticulously.

2. Scope of enforcement

1. The policy includes practices, manuals on anti-fraud, 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, business competitors, creditors, debtors, private sector entities, public sector entities, state enterprises, including legal entities and related persons.

3. Definitions

“Misconduct” refers to fraud, corruption, embezzlement, violation of laws, rules and regulations imposed by external regulators and/or violations of code of ethics and code of conduct, policies, measures, regulations, procedures set by the Company.

“Fraud” refers to actions or omissions intended to gain undue or illegal benefits for oneself or others, either directly or indirectly. Fraudulent behaviors can be categorized as follows:

1. **“Corruption”** is the act of offering, requesting, or accepting money, goods, or any other benefits to/from government entities, government officials, private companies, or private company officials. This is done to induce an action or inaction, or to influence improper actions against their duties. The intention behind such acts is to gain unfair competitive advantages or to obtain benefits illegally. This might include Bribery, Conflict of Interest, Economic Extortion, and Procurement.

2. “Asset Misappropriation” is the use of company assets for personal gain. This includes Theft of Cash/Inventory/Other Assets, Fraudulent Disbursements, and Misuse of assets.
3. “Financial Statement Fraud” is the act of overstatement or understatement. This involves hiding or distorting information in notes to financial statement (Information Asymmetry).

“Deceit”

refers to actions or omissions done fraudulently and with an intention to deceive, in order to gain benefits which one should not legally obtain, for oneself or others. Regardless of whether the beneficiary of deceit is the perpetrator or someone else, it can include providing false statements, concealing the truth, or hiding information that should be disclosed.

4.Roles and Responsibilities

Board of Directors

- 1) Define policies by considering laws, regulations, and good corporate governance principles.
- 2) Allocate sufficient resources for policy implementation.
- 3) Supervise and monitor the adequacy of policies and measures in conjunction with the implementation to ensure that management recognizes and prioritizes combating all forms of corruption and inculcates this as organizational culture.

Audit Committee

- 1) Provide opinions to the Board of Directors concerning the adequacy of policies and accompanying measures for compliance.
- 2) Assess the sufficiency of internal control, financial reporting, and other processes related to measures against all forms of corruption.

Risk Management Committee

Monitor the status of risks and the implementation of risk management measures in corruption and fraud, including the adequacy and appropriateness of existing measures.

Company Secretary

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

Internal Audit Department

Responsible for auditing, reviewing compliance with policies, and reporting the results of the audit in accordance with policies to the Audit Committee.

Any Department within the Company Assigned to be Responsible for Accompanying Measures for Policy Implementation

- 1) Develop and revise the accompanying measures for policy implementation as assigned.

- 2) Plan and propose resource requirements for policy implementation.
- 3) Communicate policies and accompanying measures to management and employees.
- 4) Supervise and track compliance with policies and accompanying measures.
- 5) Evaluate the performance of policies and measures to report to the Risk Management Committee and the Audit Committee.

Executives and Employees

Understand and comply with the Company's policies.

5.Policy and Practices

Since corruption is considered a serious violation of the Company's business ethics, and there are penalties according to company regulations and/or legal penalties, the Company will not allow the Board of Directors, executives, and all employees to engage in corruption and will not tolerate any form of corruption related to the Company, both in transactions with the government and the private sector, and will act in accordance with the laws in each country where the Company operates.

The Company has provided measures, regulations, guidelines, and practices that are adequate and appropriate to the Company's risks and risk tolerance, and communicates to relevant parties to understand and act correctly and appropriately. The Company protects the actions according to the policy defined. Directors, executives, or employees who refuse to allow corruption will be protected, not punished, and not adversely affected by adherence to this policy.

6.Penalties

Those who violate laws, regulations, policies, including any other practices of the Company will be subject to disciplinary action based on intent, circumstances, and results of the offence, cooperation in investigations, actions of offender in order to correct or prevent such incidents from recurring. Offenders may be subject to disciplinary action starting from a written warning to the highest disciplinary action, i.e. release from position or termination of employment contract and and if it is an act that violates the law, legal action will be taken.

7.Review of Policy and Monitoring

The Company will arrange for an annual review of the anti-fraud policy and will ensure regular reviews of compliance with policies and practices in anti-corruption.