



Anti-Fraud and Corruption Policy

Effective from 19 March 2025

Anti-Fraud and Corruption Policy

The Company places great importance on conducting business with transparency, integrity, and respect for all stakeholders in accordance with good corporate governance principles. The Company is committed to maintaining honesty and legal compliance. Therefore, the Company adopts a strict anti-fraud and anti-corruption policy requiring all personnel to avoid any behavior direct or indirect that may be linked to corruption in any form. The Company also maintains a policy not to penalize or negatively treat any personnel who refuse to participate in corruption, even when refusal may result in loss of business opportunities.

Definitions

Company Personnel

Refers to directors, executives, and employees at all levels of the Company and its subsidiaries, including permanent employees, probationary employees, and contract employees.

Fraud

Means intentional acts committed to improperly obtain benefits for oneself or others (such as family members or associates). Fraud is classified into 3 major categories:

- (1) Asset Misappropriation
- (2) Fraudulent Reporting
- (3) Corruption

Asset Misappropriation

Refers to actions that result in the unauthorized possession of Company assets or cause the Company to lose assets, opportunities, or any form of benefit, with the intention of gaining advantage for oneself or others. Examples include using Company property for personal benefit, stealing Company money, or using Company funds for improper purposes.

Fraudulent Statements

Refers to the preparation of reports whether financial or non-financial for the purpose of concealing asset misappropriation or other improper acts, to benefit oneself or others, by submitting information to the Company that is inaccurate or not truthful. Examples include:

- Financial reports: such as recording transactions in the wrong periods, or falsifying revenue or expense entries.
- Non-financial reports: such as falsifying employee qualifications or altering external documents.

Corruption

Means any intentional act, in any form, in which a person uses their position, duties, authority, or influence to obtain benefits for themselves and/or related people, whether directly or indirectly, involving government officials or occurring between private-sector entities.

Corruption occurs only when two parties participate together:

- One party acts as the offeror/giver (Supply Side) by offering, promising, or agreeing to give a bribe to the other party.
- The other party acts as the receiver/requester (Demand Side) by accepting or soliciting the bribe.

The giver intends to induce the other party to perform, or refrain from performing, an act that violates their duties, to obtain or preserve benefits for themselves, related people, or their business except in cases permitted by law, regulations, announcements, internal rules, local customs, or commercial practices.

Anti-Corruption Policies and Practices

Gifts and Hospitality

Gift

Any asset or benefit with monetary or sentimental value is given based on customary practice or special occasions, including money, items, or other benefits.

Hospitality

Entertainment, meals, accommodation, transportation, and related activities intended to express appreciation, foster good relationships, or support business opportunities.

Traditional

Culturally significant events such as New Year, Chinese New Year, or the Moon Festival.

Special Occasions

Important milestones for an organization or business partners, such as company anniversaries, product launches, or signing ceremonies.

Gift and Benefit Management Committee

A committee of at least three representatives from:

- Compliance
- Accounting / Finance
- Procurement
- Human Resources

This committee oversees the review, control, and management of all received gifts and benefits.

The Company recognizes the importance of good business relationships but strictly prohibits giving or receiving gifts or hospitality that could influence business decisions, cause conflicts of interest, or compromise objectivity.

However, appropriate gifts or hospitality given transparently on special occasions may be allowed under the following rules:

1. Gifts - Rules

- 1.1 Cash or cash equivalents (e.g., checks, gift cards, stocks, bonds, jewelry, gold, real estate) are strictly prohibited.
- 1.2 Modest gifts given on traditional or special occasions, such as calendars, posters, diaries, stationery, fruit baskets, snacks, beverages, or souvenirs valued at no more than THB 3,000 per person per occasion, may be accepted occasionally.
- 1.3 If a Company employee receives any cash or cash equivalents, or any gift exceeding THB 3,000
 - The gift becomes Company property. The employee must
 - Complete the Gift and Hospitality Reporting Form
 - Obtain acknowledgment from their manager
 - Submit the form and gift to the Gift Committee within 7 days
- 1.4 The Gift Committee will allocate received gifts for collective benefit (e.g., company events or donations).
- 1.5 The Company discourages partners from giving gifts to avoid bias, discomfort, or conflicts of interest, except for customary practices.

2. Hospitality - Rules

2.1 Requests for approval of hospitality expenses must be reasonable and appropriate to the circumstances. Such expenses should not occur during periods when the Company is submitting bids, or at times that may be interpreted as attempts to influence, induce, or reward any person for improper benefits. In addition, any request for approval must clearly specify the necessity and business purpose, provided it does not violate applicable laws, and must follow these guidelines:

- Hospitality expenses averaging no more than THB 3,000 per person per occasion require approval from Management Level 10 and above (Vice President / Chief Operating Officer / Chief Financial Officer / Chief Technology Officer, as the reporting line); or
- Hospitality expenses averaging more than THB 3,000 per person per occasion require approval from Management Level 11 and above (President / Chief Executive Officer of Revenue Stream).

2.2 Personnel of the Company or its subsidiaries must not accept invitations to hospitality events, seminars, training sessions, study visits, or business tours where the invitation party pays for all or part of the expenses, unless there is a clear business necessity. Participants who attend such hospitality must complete the Hospitality Acceptance Request Form, obtain approval from a Division Manager or above, and submit the form to the Gift and Benefit Management Committee within 7 days of receiving the invitation.

2.3 The Company does not support hospitality offered by business partners or related parties of the Company or its subsidiaries if such hospitality may influence decision-making, create bias, cause discomfort, or result in conflicts of interest—except for hospitality given in accordance with customary traditions.

Sponsorships and Donations

Sponsorships

The provision of money, goods, or benefits to support activities or organizations to promote Company image.

Donation

Refers to the giving of money, goods, or any other benefits to agencies or organizations with the purpose of serving the public interests such as helping, relieving public hardship, supporting religious activities, or contributing to community projects. Donations are part of the Company's commitment to social responsibility and are made without expectation of anything in return.

The Company has a policy not to accept sponsorships or donations in any form. However, the Company may provide donations or sponsorships itself, provided that such actions are carried out transparently, openly, and in the name of the Company (not in a personal capacity), and do not violate any laws or public moral standards.

The Company must also ensure that such donations or sponsorships are entirely free from any involvement in fraud or corruption, under the following conditions:

- (1) Each donation or sponsorship must not exceed THB 1,000,000 per event.
- (2) All requests must follow the Company's authorization matrix and must be made only to credible organizations or agencies.
- (3) The purpose must be clearly defined and appropriate, aiming to promote the Company's business, brand, or genuinely responsible business practices.
- (4) Complete supporting documentation is required, such as receipts, certificates, letters of appreciation, or photographs, to verify that the donation or sponsorship is not used as a pretext for any form of corruption.

Political Support

Refers to providing support or assistance to political activities, political parties, politicians, or election candidates. Such support may take the form of money, goods, or any other benefit, whether involving local or national political parties or individuals. Examples include advertising or promoting a political party or candidate, or purchasing tickets to events organized to raise funds for a political party or related organization.

The Company has a policy **not to support any political party, politician, or political group**, whether directly or indirectly. At the same time, the Company respects the legal political rights and freedoms of its personnel, who may exercise their rights in a personal capacity, subject to the following guidelines:

- (1) Do not use one's position or authority in the Company to persuade, order, or influence subordinates to participate in any political activity or support any political party or politician.
- (2) Do not use Company resources, such as Company premises, assets, name, logo, uniforms, or working hours, for political expression.
- (3) Do not express opinions or engage in actions that may create the perception that the Company is involved with or supports any political party, politician, or political group.

Conflict Of Interest

Refers to situations in which an individual is required to perform duties or decide while holding two conflicting roles. A conflict of interest may arise from personal desires or from providing benefits to related people such as family members, relatives, or individuals with other forms of relationships that influence one's actions or decisions in a way that is not independent or impartial, preventing the person from properly upholding the Company's interests.

The Company's policy requires all personnel to perform their duties with the Company's or its subsidiaries' best interests as the primary consideration. All actions must be carried out with integrity, reasonableness, transparency, and accountability, under the following guidelines:

- (1) Personnel must not engage in, become a partner of, or have any involvement in businesses like the Company's business, or businesses that compete with the Company or its subsidiaries.
- (2) Before entering any transaction, the person must verify whether the counterparty is someone with whom a conflict of interest may exist.
- (3) Personnel must avoid participating in any decision-making process including proposing, endorsing, or approving transactions with any counterparty that has a relationship with them, such as family, relatives, or businesses owned by themselves or their relatives. Even if the transaction benefits the Company, another person with equal authority must handle the matter instead.
- (4) If a meeting participant has a vested interest in the matter under consideration, that person must temporarily leave the meeting so others can deliberate freely, without influence.
- (5) Personnel must not use information obtained from their duties for personal gain, as such actions may cause harm to the Company.
- (6) Directors and executives must prepare and submit a report on their interests and those of their related persons within 7 days of being appointed and/or whenever such information changes.

Facilitation Payments

Means informal payments made to government officials to speed up a process or to ensure that officials carry out procedures which, in principle, do not require the exercise of their discretion. These are actions that fall within the official's normal duties and relate to public services that individuals or organizations (the Company) are already legally entitled to receive, such as applying for/renewing licenses or requesting various certificates.

The Company has a policy to prohibit facilitation payments in all cases, as they carry the risk of being regarded as bribes to government officials, which is illegal.

Hiring government employees or public officials

Government Employees or Public Officials

Means persons holding political positions, civil servants, officers, or employees who hold a position or receive a regular salary in a government agency or state enterprise, including directors, sub-committees, or any group of persons who exercise, or are delegated, administrative authority to perform any act under the law, whether such bodies are established within the civil service, state enterprises, or any other state undertaking.

The Company has a policy not to employ government employees or public officials in any manner that may create a conflict of interest for an individual who holds roles in both organizations at the same time. Such a situation may cause the performance of duties in the government agency to lack impartiality or may be interpreted as an attempt to steer public policy in a way that benefits the private company that also employs that person, which carries a risk of leading to corruption.

However, if it is necessary and cannot be avoided, the Company shall consider employing government employees/public officials under the following conditions:

- (1) The employment must not be contrary to any applicable laws, regulations, or rules.
- (2) Clear and transparent criteria and procedures must be established for recruitment and selection, background checks, approval of employment, and the determination of remuneration, to ensure that the hiring of such persons can be clearly explained as not being a reward in exchange for benefits that could be interpreted as corruption.

(3) If the person whom the Company intends to appoint/employ is a former government employee or public official, the following guidelines shall apply:

- For persons who will serve as company directors, the Company Secretary shall verify the relevant information and report to the Board of Directors to support consideration of approval or nomination for appointment in every case.
- For persons who will serve as executives, advisors, employees, or workers, the Human Resources Department shall verify the relevant information and report to the authorized approver to support the hiring decision in every case.
- Personnel who serve as company directors, executives, advisors, employees, or workers of the Company and who previously held positions in government agencies shall perform their duties with due care. If they find themselves in a situation that may give rise to a conflict of interest, they must immediately report it to the Company and strictly comply with the Company's prescribed measures for preventing conflicts of interest.
- Information on the positions held and work experience as a government employee or public official, both past and present, of persons who are directors or senior executives of the Group shall be disclosed in the Annual Report / Form 56-1 One Report.

Duties and Responsibilities

1. The Board of Directors Is responsible for setting policies and overseeing the establishment of an effective anti-corruption support system, to ensure that management is aware of and gives importance to anti-corruption efforts and instils them as part of the organizational culture.
2. The Audit Committee Is responsible for reviewing financial reports, the risk management system, the internal control system, and the internal audit system to ensure that they meet standards, are suitably robust, and are sufficient to prevent corruption within the organization.
3. The Risk Management Committee Is responsible for considering the risk management process and supporting the inclusion of corruption-related risks in the assessment of organizational risks in all key processes.
4. Executives at All Levels Are responsible for establishing systems that support anti-corruption measures, communicating them to employees and all relevant parties, and reviewing the appropriateness of management systems in all operational processes, as well as the various measures, so that they remain aligned with changes in business, regulations, rules, and legal requirements, and are able to prevent corruption risks that may arise in the organization.

5. The Human Resources Unit And other relevant units are responsible for providing orientation, training, or other appropriate activities to educate the Company's employees and executives to instils awareness of the importance of, and a positive attitude toward, anti-corruption. They are also responsible for establishing disciplinary measures for employees who do not comply with the Company's anti-corruption measures, and, at the same time, for not demoting, punishing, or taking any adverse action against employees who refuse to engage in corruption, even if such refusal may cause the Company to lose business opportunities.
6. The Risk Management Unit Is responsible for assessing risks together with executives and operational staff to ensure that corruption risks are fully covered, and for improving appropriate management guidelines in accordance with the Company's risk management process.
7. The Internal Audit Unit Is responsible for reviewing whether operations are carried out correctly in accordance with policies, guidelines, and the authority matrix prescribed by the Company, to ensure that the Company has an internal control system that is appropriate and sufficient to address potential corruption. The unit shall promptly report any issues found to the Audit Committee, the Board of Directors, and senior management (as the case may be).
8. Company Personnel Have the following responsibilities:
 - To demonstrate clear commitment and determination to combat corruption, and to jointly build organizational values that emphasize awareness of operating with honesty, integrity, and transparency.
 - To study the Company's anti-corruption policies and guidelines, as well as the operating procedures prescribed by the Company, by understanding their roles, duties, and responsibilities, and giving importance to the analysis, assessment, and presentation of issues that represent potential corruption risks related to their own area of work or other relevant areas (if any). Such risk issues may be raised with their supervisor and/or the person responsible for risk management within their affiliated unit.
 - To perform their duties in strict compliance with the policies, guidelines, and measures on anti-corruption established by the Company.
 - To cooperate with and support the prevention and suppression of corruption by not remaining passive when encountering improper behaviour, suspicious incidents, or events that may indicate corruption. Such matters must be reported to their supervisor without delay, or through the reporting channels specified by the Company in the Whistle Blowing Policy (Policy on Receiving Complaints and Whistleblowing). Persons who report in good faith shall receive protection as provided in that policy.

Penalties

Corruption is an unlawful act subject to both civil and criminal penalties.

Any Company personnel who violate or fail to comply with the Anti-Corruption Policy shall be deemed to have committed a serious breach of the Company's work rules and regulations, and shall be subject to disciplinary action, to be imposed in accordance with those rules and regulations.