

## Anti-Corruption Policy

The Company has realized the importance and necessity and has been committed to anti-corruption to comply with good corporate governance and operate the business with responsibility to society and stakeholders. Corruption in all forms whether by proposing, promising, soliciting, requesting, giving or accepting bribes or behavior that imply corruption, both directly and indirectly. The Company considered various issues according to the self-assessment on anti-corruption measures prepared by the Thai Institute of Directors (IOD) and formulated this policy in order for directors, executives and employees to adhere as a guideline for conducting business with transparency, good governance against all forms of corruption, covering all businesses and transactions in all countries and relevant departments. The details are as follows:

### 1. Glossary of Terms

1.1 Company's personnel such as directors, executives and employees of the Company and its subsidiaries.

1.2 Corruption refers to the act or omission of performance in the duty of position, or the abuse of power in the duty of position as well as violation of laws, ethics, regulations, policies, charters or the Code of Conduct of the Company for the purpose of unjust exploitation in any form such as giving or accepting bribes, offerings, pledges, asking or demanding money, property or any other improper benefit that is against morals, ethics, laws, regulations, policies, government officials, government agency, private agency, or any other person related to business in order for such person to act or refrain from performing duties in order to obtain a benefit or maintain business or any other improper business benefits both to the organization itself or to those involved including providing and providing confidential information except in the case where laws, regulations, announcements, regulations, local customs or trade customs are permitted.

1.3 Political Contributions are contributions, whether financial or otherwise, to support the activities of political parties, politicians or persons with political responsibilities both directly and indirectly whether it is a loan, giving things or services, advertising promoting or supporting a political party, buying tickets to events organized to raise funds or make donations to organizations with close ties to political parties, including giving employees the opportunity to take unpaid leave or represent the Company to participate in the operation of political campaigns, etc.

## 2. Scope of Policy

2.1 The Company has a policy to comply with all laws and standards related to anti-corruption in Thailand and in all countries where the Company's representatives conduct business on behalf of the Company.

2.2 This policy is extended to agents, counterparties or any person acting on behalf of the Company and its subsidiaries.

## 3. Duties and Responsibilities

### 3.1 Board of Directors

Be responsible for determining policy and supervising an effective anti-corruption support system in order for all employees to understand and realize the importance of anti-corruption and instilling the policy as a corporate culture, as well as provide advice and follow up to ensure compliance with the good corporate governance policy, business ethics as well as anti-corruption policy and measures.

### 3.2 Audit Committee

Be responsible for reviewing financial report, accounting reports, internal control system, internal audit system and risk management system to be appropriate and efficient as well as receiving corruption complaints caused by people in the organization, consider the fact and present the matter to the Board of Directors to consider, punish or resolve the problems.

### 3.3 Risk Management Working Group

Be responsible for the preparation of risk assessments related to corruption as well as establishing measures and guidelines to prevent risks from corruption and present to the Audit Committee and the Board of Directors.

### 3.4 Executive Committee, Chief Executive Officer and Executives

Be responsible for implementing the anti-corruption policy and communicate to employees and all related parties, including determining the adequacy of systems and measures to meet with business changes, rules, laws, and legal obligations.

### 3.5 Internal Auditor

Be responsible for auditing and reviewing the operation to be in accordance with policies, guidelines, regulations, and relevant laws in order to ensure that there is an appropriate and sufficient internal control system in place to reduce the risk of corruption that may occur and report to the Audit Committee.

## 4. Anti-corruption practice guidelines

The Company does not tolerate any kind of corruption, covering all businesses and transactions in all countries and departments. Personnel of the Company must fully adhere to the Company's anti-corruption policy, Charter, and Code of Conduct, and shall not engage in any type of corruption, both directly and indirectly, including the following:

4.1 Not acting in a way that represents the intent of corruption, giving or accepting bribes to government, private officials or stakeholders related to the Company to obtain or maintain a business or competitive advantage or for the benefit of oneself and those involved, including asking and paying bribes to any other person who has contacted the project, including government agencies in order to obtain benefits in an improper manner.

4.2 Not ignore when seeing an action that is considered corruption related to the Company and notifying their supervisors or responsible persons and cooperating in the investigation.

4.3 The Company shall provide fairness and protection for individual people who refuse to corruption or report the clue to the Company.

4.4 A person who commit corruption, which is an act of unethical conduct must be punished in accordance with the Company's regulations, and may be subject to legal penalties if the act is illegal.

4.5 The Company recognizes the importance of informing, educating, and understanding those who must perform duties related to the Company or who may have an impact on the Company in matters governed by this anti-corruption policy.

4.6 The Company has an appropriate and efficient audit process and internal control system in place on a regular basis, including finance, accounting, record keeping, etc, as well as a risk management system to prevent corruption.

4.7 The Company provides a human resource management process that demonstrates the Company's commitment to anti-corruption measures from the selection, training, performance evaluation, remuneration, and promotion.

4.8 In order to clarify the operation in matters that have a high risk of corruption, the Company's personnel must perform their duties with caution, in the matters as follow:

#### 4.8.1 Political Contributions

4.8.1.1. The Company is political neutral and will not support or act in favor of any political parties.

4.8.1.2. The Company will not provide financial or material support to any political parties, politicians, or political candidates for the purpose of favoring the Company's business.

4.8.1.3. The Company's personnel shall conduct business activities objectively, not focusing politically on politicians or any political party and must not provide financial or material support to any political party, politician, or political candidate for the purpose of favoring the Company's business.

4.8.1.4. The Company's personnel have the right to participate in political activities under the provisions of the constitution, but they must not pose as employees or use Company property, such as equipment or tools, for political purposes. If personnel participate, they shall be careful not to do anything that gives the impression that the Company supports or is affiliated with a political party.

#### 4.8.2 Donations and sponsorships

4.8.2.1. The Company can make charitable contributions either in the form of financial assistance or in other forms such as educating or donating time, etc. This may be a part of giving back to society as well as public relations and enhancing the good image of the Company without claiming any compensation from the donor and without expecting business returns.

4.8.2.2. To provide financial support or other assets to any activity or project, the Company must operate transparently and legally, only identify the giver in the name of the Company through the approval process in accordance with the Company's regulations, and ensuring that such contributions are not mask as bribery. However, sponsorship must be for public relations, business promotion, and the Company's good image, which can take many forms, such as supporting cultural activities, social and environmental activities, as well as educational and sporting activities, etc.

4.8.2.3. Personnel of the Company shall exercise caution when making donations and sponsorships to mask as bribery. All donations and sponsorships must pass a thorough review and adhere to all applicable laws and regulations. The purpose of the donation and sponsorship is provided to the authorized person at each level upon written request, along with other supporting documents.

4.8.2.4. To donate and support public charities, the Company must have clear and reliable evidence of donations to ensure that the funding and charitable donations are not an excuse for corruption.

#### 4.8.3 Gift, Hospitality, and Entertainment

The Company recognizes that maintaining positive relationships with business partners is critical to long-term success. Therefore, the Company has established guidelines as follows:

4.8.3.1. Personnel of the Company can give gift and entertain business partners. If all of the following conditions are met:

- (1) It is not permissible to dominate, induce, or reward any individual person for gaining an advantage through unethical behavior or underhanded means in order to obtain assistance or benefits.
- (2) It complies with the relevant laws, regulations, and the Company's rules.
- (3) It is given in the name of the Company, not on behalf of the employee and act openly without concealment.
- (4) The type and value are appropriate and timely such as during the bidding process, personnel must refrain from giving gifts or hosting an entertainment for government officials, employees of the company, or related departments, etc.
- (5) Be appropriate to the situations such as giving small gifts during important festivals is a common practice.
- (6) The gift exchange was done in a public manner.

4.8.3.2. Personnel of the Company may receive gifts or other benefits during the festival or according to standard practice, but exceeding 2,000 baht. The gifts cannot be in the form of cash or cash equivalents such as gift certificates, gift cards, or other similar items. If such a gift or benefit cannot be refused at the time, the recipient must notify their direct supervisor, prepare a report on the gifts received, and send such gifts to the Human Resources and Administrative Department to be used as prizes for employees in important festivals or to request approval to donate to public charities as appropriate.

4.8.3.3. The Company will provide the disbursement regulations by establishing a limit, table of authorities, objectives and recipients, which must be accompanied by clear documentary evidence to prevent political assistance or corruption.

## **5. Communication and Training**

5.1 The Company will make arrangements for the anti-corruption policy to be communicated and disseminated to all departments within the Company and its subsidiaries through various channels, such as orientation for new directors and employees, annual training or seminar, posting announcements in public relations boards, e-mails, as well as training the Company's personnel on various forms of corruption, risks of being involved in corruption, and how submit a whistleblowing report for the relevant parties to know and implement the policy.

5.2 The Company encourages the personnel to receive training in order to promote honesty, integrity, and responsibility when performing their duties and responsibilities, as well as to establish a mutual understanding of giving and receiving gifts, assets, and other benefits, business or traditional entertainment, donations, as well as provide political assistance and support.

5.3 Personnel of the Company who have any questions regarding this policy or any anti-corruption measures can inquire with the Secretary of the Audit Committee.

## **6. Penalties**

Anyone who intentionally acts against this policy, such as harassing, intimidating, or discriminatory behavior by unfair means to the whistleblower or the person involved in the complaint, shall be deemed to have committed a breach of discipline and will be liable for compensation damage to the Company or people affected by such actions, as well as being liable for civil and criminal or other relevant laws.

**7. Measures and channels for whistleblowing or complaints (Whistle Blower)**

The Company has established a system for receiving complaints and taking action in cases where there are hints of wrongdoing or behaviors that could indicate a corruption. This includes appropriate whistleblower protection measures, as outlined in this policy, in order to effectively receive complaints of corruption and wrongdoing. The Whistle Blowing Policy and Procedures contain all of the relevant details.

In this regard, the Company has determined that the anti-corruption policy should be reviewed at least once a year.

Announced on 25 March 2021

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(Mr. Prasert Bunsumpun)

Chairman of the Board of Directors