Anti-Corruption Policy and Practice

Thantawan Industry Public Company Limited

THANTAWAN

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Anti-Corruption Policy

Thantawan Industry Public Company Limited "The Company" has a policy to promote morality, ethics, and transparency by emphasizing on fair business practices to all relevant person in and outside of the industry which included shareholders, employees, customers, partners / creditors, competitors and society.

The Company determines principles of unsupportive activities of a group or persons who act inappropriately in seeking for benefits in order to make sure that the operation will be carry out without corruption. Therefore, the Company has set up a policy to conduct the business and communicate to the Board of Directors, Chief Executive Officers, faculty of management and employees at all levels are strictly adhered not to perform or accept corruption at all, no matter in a direct or indirect way.

Every relevant departments are comprehensive to review the implementation of anti-corruption policy regularly. As well as reviewing the guidelines together with the requirements for various operations. In order to comply with business changes, regulations and legal requirements.

1. Definitions

1.1. Malpractices

Refers to an offense or deception with the intent of seeking personal gain by directors, executives and employees of the Company, customers, business partners or contractors of the Company, including the making of financial evidence and claiming false expenses. Using the Company's assets for personal gain and corruption.

1.2. Corruption

Refers to the use of power for personal gain, actions to obtain or maintain an unfair business advantage.

1.3. Bribe

Refers to an incentive or reward that is given, offered, or promised. Whether it is a financial benefit or any other benefit of any kind. This includes giving gifts or services, cash or things instead of cash or request for wrongdoing, whether it is any action in connection with public or private affairs.

1.4. Political contributions

Refers to help whether it is cash or other format to support political activities as well as promoting employees to participate in political activities on behalf of the Company without aiming for a commercial business advantage such as providing goods or services, advertising, or promotion or support a political party, buying tickets for an event to raise funds or donate money to organizations that have a close relationship with political parties, etc.

1.5. Giving donation/Receiving donation

Giving donation refers to providing financial assistance or other forms, such as giving knowledge or taking time to be a part of social giving activities, donate products of the Company as well as public relations for charity or public benefit and enhance a good image for the company by not aiming for business results in return, and does not create a conflict between personal interests and the interests of the Company which must prepare a memo for approval clearly state the purpose and name of the person or organization who receives the donation or

receives support. Along with attaching relevant documents to present the company authority for approval before proceeding according to the Company regulations.

Receiving donation refers to receiving in the form of cash, goods, assets for donation to charity.

1.6. Support

Refers to money paid to or received from a customer, partner or business partner. The objective is for the Company's business, brand or reputation, which is for the benefit of building trade credibility and helping to direct business relationships as appropriate to the occasion.

1.7. Giving gifts, Reception fee, Travel expenses and other expenses

Refers to giving gifts, reception fee, travel expenses and other expenses which do not affect the Company's operating results but it has to accordance with the relevant laws is given on behalf of the Company. Not on behalf of the employee which is suitable for festivals such as the New Year Festival, Songkran and Chinese New Year which is considered a normal custom and it has to be done with transparently.

1.8. Accepting gifts, property, bribes or any other benefits

Refers to accepting gifts, assets, bribes or any other benefits. This is not an action affecting the Company's operation but in accordance with relevant laws. As receiving in the name of the Company. If it is not on behalf of the employee, it is suitable for festivals such as New Year, Songkran, Chinese New Year, which is a normal and open tradition including received because of the situation that cannot be denied or to maintain a good relationship with each other in business or for any other reason.

1.9. Government employees

Refers to a person who is or has been **a government official** / politician / advisor of a government agency and has come to work for a private company and may rely on internal relationships or information to benefit private companies or create a conflict of interest in the performance of duties of a government agency or business governing body with companies under the supervision. As a result, the action aims to create an unfair business advantage or formulate a private benefit policy that a former government official has worked for.

In addition, a government official is a person holding a political position. Government officials or local employees with permanent positions or salaries Employees or persons working in state enterprises or government agencies local administrators and local council members who are not political persons Officials under the law on local administrative nature includes members of the employee subcommittee of government agencies, state enterprises or state agencies and a person or a group of persons exercising power or assigned to exercise the administrative power of the State in carrying out any act under the law. whether it is established in the government system, state enterprise or other state enterprise.

1.10. Partners

Refers to corporations, business partnerships, third parties, or any busines related person

1.11. Third party

Refers to a person outside the business partner or an agent who assists in dealing with government work or with business partners.

1.12. Conflicts of Interest

Refers to any situation or action or activity in which a practitioner has his or her personal or personal interests, whether by blood or otherwise, that affects a decision or performing duties in the position that the person is responsible for and impact on the common interests of the company as well That situation may cause the person to lack the fairness to make transparent decisions.

1.13. Convenience Fees

Refers to a form of payment or giving money to a government employee. To speed up the action or encourage the implementation of the normal procedure by which the process does not require the discretion of the State employee and is in the deed of that State employee. Including the rights that the juristic person should have under the law or to acquire a business advantage.

2. Roles and Responsibilities

2.1. Board of Directors

Has a role to consider and approve policies. In order to ensure and supervise the system to have anti-corruption mind set. The board and the Management Committee should acknowledge the anti-corruption policy. Together with adhering to the guidelines of the employees to the entire organization.

2.2. Nomination Committee Determine Compensation and Good Corporate Governance

Duty to set policies and supervising compliance with anti-corruption. In order to present to the board of directors for consideration and approves. Along with giving advices to the Chief Executive Officer and senior executives to have responsibility to implement an anti-corruption policy.

2.3. Audit Committee

Duty to review and evaluate internal controls, financial report, preparation, and other processes related to Anti-Corruption Policy. To ensure that the company has complied with the laws and regulations for the criteria of the company as determined. Having proper segregation of duties and responsibilities including reviewing internal controls. Which regarding to anti-corruption measures with personnel working in advance, before reporting the results to the board of directors.

2.4. Risk Management Committee

The duty of assessing the opportunities and impact of risk factors that may be caused by corruption as well as determination risk management policy and placing the risk management framework of the company. Including supervising, monitoring and reviewing risk management reports. To ensure the confident of effective risk

management that are suitable for operating the business of the company. Then report the results to the Board of Directors.

2.5. Chief Executive Officer and Senior Management

Duty to receive the authority and responsibility for implementing anti-corruption. For instance, having a system to support the anti-corruption policy and pass it down to employees along with all related parties. Reviewing the appropriateness of the internal control system. In order to consistent with business changes, regulations, and legal requirements. Including the audit report, according to the anti-corruption policy to the Audit Committee, Nomination Committee, Determine remuneration and good corporate governance and the Board of Directors Consistently.

2.6. Internal Audit Department

The Internal Audit Department is responsible for inspecting and reviewing operational processes to ensure compliance with policies, practices, operational authority and the regulatory requirements of regulator in order to ensure that the operational process have a suitable and sufficient control system against the risk of corruption that may occur and report to the Audit Committee.

2.7. Employees have a duty as follows;

1) Strictly abide by the anti-corruption and corruption policies and procedures,

2) If you find any questions or whether they unsure of their operations that they comply with the Company's anti-corruption and corruption policy, you need to consult with the supervisor or the legal department.

3) Monitor, whistleblowing or making complaints when an action is found that may imply corruption and corruption.

3. Anti-corruption guideline and practice

3.1. The Board of Directors, Management Committee, and Employees do not perform anything related to corruption in all forms, both directly and indirectly.

3.2. The company prohibits directors, executives, and employees of the company from doing any act that is tended to be ccorruption. Such as, giving or receiving bribes to or from government officials, Government agencies, private agencies, or stakeholders related to the company. In order to gain or maintain business trade advantages and competition.

3.3. The company prohibits directors, executives and employees from demanding the operation or accepting corruption for the benefit of oneself, family, brothers, friends, and acquaintances.

3.4. The company has authorized the directors, executives and employees of the company must work carefully in the work process that has a high risk of corruption. Such as, Sales and procurement, marketing, investment project, contracting, giving and receiving gifts, Souvenirs or other benefits, Reception, giving donations, supporting funds, etc.

3.5. The company has authorized the directors, executives and employees of the company take actions on giving or accepting donations for supports in the right way. According with the company regulations and required by law ensuring that donations or financial support are not used for bribery.

3.6. The company has authorized the directors, executives and employees of the company cautious in making transactions with person, or any organization that is questioned about corruption.

3.7. The company prohibits directors, executives, and employees of the company from neglecting or ignoring when seeing acts that are considered to be corruption related to the company. Which is considered as duty to inform the director or the person in responsible. Be cooperate in examining various the truth.

3.8. The company will provide fairness and protection to those who have refused corruption or informing clues about Corruption to the company. As specified in the whistleblowing measures and mechanisms to protect whistleblowers. As well as the cooperators in the reporting of corruption. Regarding the specified Company's whistleblowing policy or complaint (Whistleblower Policy) with the Code of Conduct of the Company.

3.9. The company will consider and punish anyone that found implicating with corruption. Which is considered as unethical act according to the regulations of the employee's discipline. The person may be punished by the law if the act is illegal.

3.10. The company will disseminate knowledge and understanding, to anyone who must work with the company or may affect the company. In order to comply with the anti-corruption policy.

4. Operating requirements

In order to be clear with the operations of high-risk matters by the occurrence of corruption. All directors, executives and employees must act with caution in the following areas:

4.1. Political Assistances

4.1.1. The Company has a neutral business policy, not being politicized, politician or any political parties adhere to political neutrality, support legal compliance and democratic governance. The Company has no policy to support the activities of political parties or politicians directly and indirectly.

4.1.2. The Company has no policy to support the activities of political parties, politicians in exchange for special privileges direct or indirect disapproval benefits.

4.1.3. The Board of Directors, the executives, staff and employees of the Company are able to participate in political activities according to personal liberty rights but do not pretend to be the Company's employee or using of assets and any equipment of the Company for the benefit of political activities.

4.1.4. The Board of Directors, the executives, staff and employees of the Company are able to participate in political activities according to personal liberty rights but this should proceed as follows;

a) Should not express in the way that makes others understand that the Company is relevant, concentrates or supports political actions.

b) Do not dress in the Company's uniforms or apply any symbols to make others understand that you are employees of the Company in participating in political activities.

c) Do not pretend to be the Company's employee for credibility in order to find a coalition of political expression.

d) Avoiding an expression or expressing political views in the office or during working that may cause conflicts in the workplace.

4.1.5. Accounting is responsible for reviewing documents that may be involved in supporting activities of political parties or a political person before paying In order not to have payment according to the policy set by the Company.

4.2. Charitable donations and support

4.2.1. Charitable donations both in the form of financial assistance or other forms. Such as giving knowledge or devote the time, etc. The company can be a part of social activities as well as public relations. It will enhance the good image for the company without aiming for business returns.

4.2.2. Giving money to supporting money or possession of cash substitution to activities or projects must be conducted with transparency legally and must specify the name of the provider in company's name. Going through compliance with the regulations of the company. Regarding the social organization and anti-social practices, such will not be used in criminal attacks. Community and society as well as public relations and company's image by creating various forms. Such as job creation, income, community, educating people in the prototype.

4.2.3. Any donations and support to government officials, government agencies including charities must perform under the following conditions;

a) The organization is reliable and/or legally established

b) It is an act on behalf of the Company which operates correctly under the law, the Company regulations and being transparent.

c) It should not pay or offer cash substitute items to government officials, or directly to any persons unless it clearly stated in the request for support with a proof of support in writing.

d) Monitoring should be done in order to ensure that donations or support has been spent for public benefit and/or meet the donation objectives and/or truly support.

4.2.4. The complaint requests the Company to provide financial support, donations and grants must do as follows;

a) The complaint presents details of requests for reimbursement, granting, financial support, donations or grants to the supervisor for consideration.

b) The supervisor of the person requesting the review before submitting to the authority in accordance with the regulations regarding approval authority.

c) The authoritised person considers the details of financial support, donations or grants to ensure that the objectives of providing financial support, donations and grants are in accordance with the company's practices then considers for approval.

d) The complaint provides an evidence of financial support, donations or grants such as a letter from the organization that supports the donation or grants, photographs or receipts, etc., to the Accounting Department as an evidence for accounting records after providing a financial support, donations, or grants

e) The Accounting Department reviews the evidence of financial support, donations or grants. If the evidence provided by the complaint is not enough, The Accounting Department notifies the complaints in order to request information or to clarify. If it is able to prove that the granting, donation, or financial support does not follow the Company's practice or to use as an excuse for corruption, the Company will punish with the highest punishment.

4.2.5. Donation acceptance

a) The Company has no policy to be a mediator in accepting donated money or assets in order to be donated to charities.

b) The Company will notify employees about the lack of a policy to be a mediator in such matters.

c) The Management must supervise their employees to comply with such requirements.

d) The Accounting Department has to review the payment transaction, property receipt list to ensure that it is not a donation receipt.

4.2.6 Receiving funds from customers, partners or business partners, whether in cash or other must be performed as follows;

a) To receive funding the requester presents details of the request for funding for the supervisor to Consider.

b) Those who have the authority to consider the details of receiving the funding by reviewing to ensure that it is in accordance with the Company's business objectives, not for their own benefit, directly or indirectly, not related to politics, not bribes, and that the funds accepted must be cheques or funds transferred to the Company's account only.

c) The requester issued a letter of thank you and presented evidence of receipt of funds such as proof of transfer, copy of cheque, etc. to the accounting department for the accounting department to check the receipt and issue proof of receipt.

d) The Accounting Department reviewed the evidence of receiving the funding. If the evidence provided by the requester is insufficient, notify the requester for further information or clarification. If it proves that receiving funding The Company will punish the offender under the highest measures.

4.3. Activity arrangement to Corporate Social Responsibilities

4.3.1. Activity arrangement of corporate social responsibility both in the form of financial assistance or other forms such as, providing knowledge, taking time to deliver products to support activities, environmental conservation, etc. The company can be a part of social return activities as well as public relations and enhance good image for the company without looking forward to business in returns.

4.3.2. Activity arrangement of corporate social responsibility together with government officials, government agencies or various organizations can be done as appropriate which must be done on behalf of the Company and it has objectives accordance with the Company's policy. It should have a clear criteria and proceed plan regarding to the Company's regulations.

4.3.3. Conducting Social responsibility activities, whether by money or possession of cash instead. Must proceed with transparency, legally right, and must specify the name of the provider in the name of the company only. By going through the approval process in accordance with the company's regulations and make sure that social responsibility activities will not be used for corruption. Which may be done in many forms, such as creating jobs, creating income, including communities educating people in the community etc.

4.3.4. Corporate social responsibility activities

a) The requestor presents the details of the social responsibility activities to the supervisor for consideration.

b) The supervisor of requestors reviews the activities before presenting to the Corporate Social Responsibility Department and corporate communication for consideration.

c) The Corporate Social Responsibility Department and corporate communication consider and prepare the annual plan before presenting the authority in accordance with the regulations as regards with approval authority and the use of the approval authority table for consideration.

d) The authorize person consider the details of the social responsibility activities to ensure that the purpose of the activities follow the company's practice for consideration and approval.

e) The Corporate Social Responsibility Department submits documents such as the annual plan, event details, etc. to the Accounting Department for the advance payment of the social responsibility

activities and manage an expense with an evidence of social responsibility activities such as receipts, images, etc., as evidence for accounting records in accordance with the established operational procedures.

f) The Accounting Department reviews an evidence of social responsibility activities. If the evidence provided by the requestor is insufficient, the Accounting Department will notify the requestor to request additional information or clarification. If the social responsibility activities are not following the company's practice or to use as an excuse for corruption, the company will punish the offender with the highest penalty.

4.4. Accepting gifts, souvenirs or other benefits

4.4.1. The Company's employees refrain from accepting gifts, assets or other benefits in all matters as well as having a duty to inform the third parties about the anti-corruption policy thoroughly

4.4.2. In the event that it is necessary to accept gifts, assets or other benefits and cannot refuse, proceed as follows;

a) Notify the supervisor immediately.

b) The staff will prepare a gift slip, souvenir, and other benefits and send documents together with gifts, or souvenir to the department which is appointed by the Company as follows;

For the Factory at Omyai and Tuangtana Nakorn, it will be sent to the Human Resources Department or assigned person.

For the Head Office at Suntowers, it will be sent to the Chief Executive Officer's Office or assigned person.

c) The responsible department takes photos of souvenirs, recording information, and attaches photos in the control registration of gifts or souvenirs to issue codes and attaches to the received items.

d) The responsible department specifies the code on the delivery note of gifts, or souvenirs and document storage and those received items at the designated place.

e) The responsible department delivers the control registration of gifts, or souvenirs to the Chief Executive Officer for acknowledging.

f) The Chief Executive Officer considers the control registration of gifts, or souvenirs for appropriate use such as raffle gifts, or donations, etc.

4.5. Giving gifts, souvenirs or other benefits

4.5.1. Giving gifts, souvenirs or other benefits by traditionally can do without a violation of the relevant laws. Local customs should be provided in a form that promote the image of the Company. Products that promote sustainable development, or generating income for the community as follows;

a) Calendars and Diaries

b) The Company's products.

c) Products used as public relations media of the Company.

d) Royal Project Products, the Royal Initiative, Community products that generate income for the community, or products that promote sustainable development.

4.5.2. Giving gifts, souvenirs, or other benefits should be equally treated in order to prevent discrimination.

4.5.3. Do not offer any gifts, souvenirs or other benefits to spouses, children or persons involved with government officials, business partners, value customers, and contacting persons because these behaviors are considered as acceptance instead.

4.5.4. Do not act as an intermediary in offering money, property, things or any other benefits to those involved with the business. Government agencies or any organizations in exchange for special privileges that should not be granted or cause government officials to refrain from following the rules, regulations, and legal practices that have been set forth.

4.5.5. Giving gifts and property on important business occasions such as the founding day Signing a business contract can do. Yet, if the value of the gift, property, or any other benefit exceeds 3,000 baht (three thousand baht only), it must be approved by the Chief Executive Officer. or according to the company's regulations.

4.5.6. Giving gifts and souvenirs on important business occasions, such as the establishment day or business contract signing, can do but if the value of gifts, souvenirs or other benefits is exceeded 3,000 baht (three-thousand-baht), it must be approved by the Chief Executive Officer or the Company's regulation as follows;

a) The requestor proposes details of giving gifts, souvenir or other benefit to the supervisor for consideration.

b) The supervisor of the requestor reviews the details before proposing to the authority in accordance with the regulations on approval authority and the use of the approval authority table for consideration.

c) The person with power to consider the details of giving gifts, souvenirs or other benefits to ensure that the purpose of giving gifts, souvenirs or other benefits adhere to the principles and practice of the Company for consideration and approval.

d) The requestor presents an evidence of gift, souvenir or other benefits such as receipts and send to the Accounting Department as evidence for accounting records in accordance with the specified operational procedures.

e) The Accounting Department reviews an evidence of gift, souvenirs or other benefits. If the evidence is insufficient, The Accounting Department will notify the requestor to request additional information

or clarification. If the fact that the gift, souvenir or other benefit are not following the Company's practice, or to use as an excuse for corruption, the company will punish the offender with the highest penalty.

4.6. Hospitality and receptions

4.6.1. Hospitality and receptions are for business receptions such as the receptions for food and beverages, sports receptions entertainment and other spending directly related to business practices or traditional including provide business insight knowledge which situation able to do but it must be a reasonable expense and does not affect the decision making of the receptionist, which may cause conflicts of interest. For instance, do not provide any hospitality-receptions during tender.

4.6.2. It must have a financial statement showing the spending expense for investigating as follows;

a) The complaint presents the hospitality and receptions such as name-surname, workplace and position of all certified persons as well as a list of the Company's employees participating in the certification for the supervisor consideration.

b) The supervisor of the complaint reviews it before proposing to the authority in accordance with the regulations on approval authority and the use of the approval authority table for consideration.

c) The authority considers the hospitality and receptions to ensure that the purpose of the hospitality and receptions follow the company's practice for consideration and approval.

d) The complaint sends the documents to the Accounting Department to proceed with advance payment before the hospitality and receptions with evidence of hospitality or receptions such as receipts as evidence for financial records in accordance with the specified operational procedures.

e) The Accounting Department reviews proof of hospitality or receptions. If the evidence provided by the requestor is insufficient, the Accounting Department will notify the requestor to request additional information or clarification. If the hospitality or receptions are not following the company's practice or to use as an excuse for corruption, the company will punish the offender with the highest penalty.

4.7. Accepting proposals for meetings, trainings, seminars and business visits by spending the business partner's budget.

4.7.1. Accepting proposals for meetings, training, seminars and business visits by using the partner's budget can be done if according to the conditions specified in the contract and according to the company's policy.

4.7.2. It must relate directly to business operations or conservative which must be done with transparency and does not affect the decision in operation or causing conflicts of interest.

4.7.3. It must not accept training proposals that has a hidden nature as tourism, against the laws and regulations without the intention of truly transferring knowledge.

4.7.4. Accepting proposals for meetings, training, seminars and business visits by using the partner's budget in the event that it is not specified in the contract agreement can do if considering that the said proposal is appropriate and beneficial to the company, which must be approved by the supervisor and according to the company's regulations.

4.8 Guidelines on Conflicts of Interest

4.8.1. Directors, executives and employees avoid doing any connected transactions with themselves that may cause a conflict of interest with the Company, performance of duties and holding positions must not conflict with the interests of the Company, any decisions regarding the Company's business operations must be in the best interests of the Company.

4.8.2. Any actions and decisions of directors, executives and employees at all levels must be free from the influence of personal needs or of persons related to directors, executives and such employees. Either by blood or by someone who is personally known and use the fair and appropriate price as if transactions with outsiders. When deciding or approving an item that may lead to a conflict of interest, this will be reported the supervisor or participant in the approval and withdraw from participation in the transaction.

4.8.3. All executives and employees should disclose or report, a list of businesses or businesses that make up a private or family or relative. or act through others who may cause conflicts of interest with the Company or its affiliates.

- Joint venture or benefits with partners who do business with the Company or its customers.
- Holding any position or even being an advisor to the partner who operates with the Company or its clients.
- Trade goods or services or conduct business directly with the Company or its affiliates or through others.

4.8.4. The executive director is required to report to the Company about his or her interests and / or related persons which are stakeholders involved in the management of the Company. In addition, it is obliged to comply with the regulations of the Stock Exchange and the Securities and Exchange Commission regarding the disclosure of information on connected transactions.

4.8.5. Executives and employees should refrain from operating in the same condition and compete with the Company's business or its affiliates, whether for personal or other interests, which may be damaging to the Company directly or indirectly, or to be a partner or shareholder who has the power to make decisions or executives in competitive enterprises or similar characteristics to the Company or its affiliates, unless

it can be shown that there is a mechanism to ensure that such actions do not affect the Company and that measures are in the best interests of the Company and its shareholders as a whole

4.8.6. Executives and employees should refrain from holding significant shares in the Company's competitors and Business partners. If the shareholding is made to the directors, Executives and Employees. The Company cannot act or refrain from doing its duties in the Company or affecting its duties. Executives and employees have had that share before becoming directors. executives and employees or before the Company enters into that business or is acquired by inheritance. referee Executives and employees must report to the Company immediately.

4.8.7. Executives and employees will not exploit themselves or others. The Company or its affiliates are based on confidential information such as plans, revenues, financial reports, etc. Resolutions of the Meeting Business predictions Research Results Whether it causes damage to the Company or not, the Company must strictly comply with the Company's internal data usage policy.

4.8.8. The procedure of checking conflicts of interest as follows;

a) Requires the Company Secretary confirms and reviews the director's stakeholder report to ensure compliance with applicable laws and report to the Board of Directors' meetings quarterly.

b) Requires the Purchasing Department checks the registration of sellers/service providers as directors the seller/service provider's partner or owner is not a Director, Executives, employees or persons of the pedigree of directors, the Company's Executives, employees, and legal departments shall provide the seller/service provider with the assurance that there is no conflict of interest with the Company.

c) Requires the Management reviews the items to be approved. If the transaction is connected to the Director, Executives, it must comply with the relevant laws and provide to the Company Secretary to ensure that the relevant laws are followed before proposing to the Board of Directors for approval of the connected transaction.

d) Requires the Accounting Department reviews the documents in accordance with Clause a to c before paying to ensure that the procedures set out above are followed.

4.9. Employment of government employees

To ensure that the Company selects personnel who have been or have been government employees in accordance with the Company's criteria and in accordance with the relevant laws in order not to use such employment in return for any benefits, including disclosing information about the employment of government employees to the public for transparency and accountability.

4.9.1. Guidelines and control measures

1) The Human Resources Department interviews and checks, if the applicant is a person who is currently working for a government agency or has worked with a government agency.

1.1) If the applicant still a government official, the Company will not hire or appoint a government officer who is still in the office.

1.2) If the applicant is a government official, it must be verified that it is an individual who has previously worked for a supervisory authority directly related to the Company or may rely on relationships or inside information to benefit the Company or create a conflict of interest with the Company, the Company can hire or appoint. They must be free from having the aforementioned characteristics for at least 2 years.

1.3) If the applicant is a government official, it must check and have detailed information on whether they have never worked for a supervisory authority directly related to the Company or have no relationship or not using the inside information to benefit the Company or does not cause a conflict of interest with the Company. Therefore, they can be employed or appointed.

2) Designated for shortlisted candidates. Must disclose information and certification of notices to the Company according to item 1 that it is true.

3) The Company arranges a background check of government officials to ensure that good internal control procedures and data retention with documentary evidence for adequate monitoring and perform appropriately in accordance with the anti-corruption policy.

4) For the transparency of the appointment, the Company will disclose the profile and work experience of the person who was a former government official appointed as the Company's advisor / director / executive. Including the reasons for their appointment in the Company's publications

6) The Company makes a contract to hire employees in the normal course of business, having no interest and there are periods as necessary and appropriate to the nature of work.

7) They must perform work in accordance with the conditions specified in the employment contract. It lists the prohibitions on acting and practices to prevent contact or abuse of power with former government agencies and they must strictly adhere to the Company's rules and regulations.

4.10. Facilitation guidelines

The Company does not have a policy to pay for convenience. The facilitation payment is prohibited.

5. Whistleblowing measures and complaints about anti-corruption policy

The Company sets out mechanisms for receiving complaints and taking actions in case of clues about illegal activities, Regulations and ethics or behaviors that may instant to the company's personnel corruption, including appropriate protection measures for whistleblowers in order to provide clear guidelines and to effectively receive complaints of corruption and misconduct.

6. Policy communication within organization

6.1. The Company is aware of the importance of disseminating knowledge and understanding with others who have to perform duties related to the Company or may affect to the Company including the public in matters that must comply with the anti-corruption policy.

6.2. The Company has made written recommendations regarding anti-corruption measures and provide channels for dissemination. For instance, posting on public relations boards, intranet system, email, the Company's website etc. In order for everyone in the Company to understand, accept, and comply with the anti-corruption policy appropriately.

6.3. The Company arranges an orientation, training, seminars about anti-corruption policy for the Directors, the executives, staffs and employees of the Company to be informed and implement appropriately.

6.4. The Company communicates and disseminates anti-corruption policy including channels for whistle blowing measures or complaints and penalties for failing to comply with the anti-corruption policy for the insiders to be informed via various channels. For instance, posting on public relations boards, intranet system, email, the Company's website etc. In order for everyone in the Company to understand, accept, and comply with the anti-corruption policy.

6.5. The Company will regularly review the anti-corruption policy and practice guideline every year.

If any employees are unsure whether any action may constitute corruption or in case of questions or concerns, employees should consult the recruitment committee determine remuneration and good corporate governance or secretary to the Nomination Committee Determine remuneration and good corporate governance.

7. Questions about policy and practice

The Company assigned the Human Resources Department or responsible person for answering questions about anti-corruption policy. When the company's personnel have any questions or need any advice in order to avoid actions that are related to corruption, they can consult with the Human Resources department.

When the Company's personnel face a situation that is uncertain in deciding whether the actions are against the anti-corruption policy. They have to do as follows;

Ask yourself the following questions:

1) Is the action illegal? If against the law, "stop doing".
2) Does the act violate the Company's policy or not? If it breaks the policy, "stop doing".
3) Is the action against values or the Company's culture or not? If it contrary to values or culture, "stop doing".
4) Does the action have a negative effect on the image of the Company? If it affects the image of the Company, "stop doing".
5) Does the action affect the Company's stakeholders? If it adversely affects them, "stop doing".
6) Is the action causing bad practices in the future? If bad practices will occur, "stop doing".

8. Internal Control

8.1 **Inspection process, internal control and data recording**

8.1.1. The Company has an inspection procedure to ensure that the internal control system and information storage properly and comply with the anti-corruption policy.

8.1.2. All departments review risk assessments and formulate a risk management plan for corruption from operations that require coordination with external agencies such as procurement, sales of goods, extension of various licenses, etc. in writing including internal control systems and management to prevent the occurrence of corruption.

8.1.3. The Internal Auditor reviews the risk management plan and internal control systems of all departments prepare for annual audit plan to ensure that all work lines comply with the internal control system that is defined. If there is an issue that is not consistent with the anti-corruption policy, the responsible department must be notified in order to improve the internal control system to be suitable and summarized as a report and send to the management team and the Audit Committee.

8.1.4. The Company provides procedures for document and various notes storages to be ready for inspection to confirm the accuracy and suitability of financial reports as well as procedures to ensure that there are no items that have not been recorded or cannot explain or false lists.

8.1.5. The Company conducts internal audits to ensure that the accounting and data retention processes of the Company have adequate internal control systems.

8.2 **For important departments have an internal control system as follows**

8.2.1. **Procurement system.** The Company has procedures in relation to the procurement and enforcement systems within the company to control every step related to the procurement process which is conducted through the system and stored as evidence for reference and can be inspected.

8.2.2. **Sale system.** The Company provides work procedures related to sales systems and enforced within the Company to control every Steps related to the sales process which is conducted through the system and stored as evidence for reference and can be inspected.

8.2.3. **Accounting system.** The Company provides accounting records in accordance with financial reporting standards and regulations of the Securities and Stock Exchange through the system and stored as evidence for reference and can be inspected. Furthermore, various accounting records must have appropriate and accurate details by specifying transactions, purchase and sale, asset management with clear objectives of the transaction. There are no forgery accounting records and related documents to conceal the actual transaction.

8.2.4. **Human resource management**

1) The Company has established a human resource management process by the recruitment and selection of personnel, promotion, training, employee performance assessment and providing

compensation by requiring supervisors at all levels to communicate and understand with employees about the anti-corruption policy in order to use in the business activities under their responsibility and supervise to be effective.

2) The Company has an orientation for new employees in order for employees to understand about anti-corruption policy, the Company expectations including penalties if employees do not comply with this policy.

3) The Company provides a continuous training process for the Directors, the Executives, employees and staffs of the Company to truly understand about the anti-corruption policy, the Company expectations including penalties if employees do not comply with this policy.

4) The Company has established a human resource management process. It is fair and protects an employee who rejects or reports any corruption related to the Company which will not affect to the position, reduce penalties or negatively affect employees even though the action will cause the Company losing business opportunities. The Company provides channels for reporting clues and protection of the informer when employees need to report information or clues, including recommendations regarding compliance with the anti-corruption policy.

9. Monitoring and Reviewing

9.1. The Nomination Committee Determine compensation and good corporate governance, must review this policy annually and propose to the Board of Directors for approval. If there is a change, including the supervision and follow the policy implementation. This issue goes into practice and provide various suggestions continuously.

9.2. The Internal Auditor will examine the internal control system and processes. Such as sales, marketing processes, Purchasing process, and other support processes of the company regularly. In order to ensure that the control system internal effectiveness is sufficient to combat corruption. Including discussing the results of the audit with related parties. To find appropriate solutions and inspection reports for the management together with the Audit Committee. Further acknowledged if there is an urgent issue, the Internal Audit Department will notify directly to the Chairman of the Audit Committee immediately.

9.3. The Audit Committee will review the adequacy along with appropriateness of the internal control system and the risk management process of the company. In order to ensure the efficiency and effectiveness of the Company's operations are transparency.

9.4. The Internal Auditor will monitor the progress of the corrective approach that is properly resolved and report the results. Follow-up to the management team and the Audit Committee for further acknowledgment.

10. Policies with affiliates, business representatives, and partners

10.1. Implementing anti-corruption policy to cover subsidiaries any other company that the Company has the authority to control, including expecting business representatives who are involved or acting on behalf of the Company to comply with this policy.

10.2. The Company communicates and disseminates anti-corruption policies, including whistleblowing channels or complaints, to the public, Subsidiaries and associated company or other companies with which the Company has the authority to control and represent business representatives, related business partners and stakeholders through channels such as the Company's website, annual reports, annual listings, etc. to create understanding and support adherence to social responsibility standards in anti-corruption matters as well as the Company.

10.3. The Company produces documents, contracts, conditions or remarks to customers or partners to sign a response to acknowledge the anti-corruption policy in the attachment to the Company's contract, including sending links to anti-corruption policies to the partners.

11. Effective date

This Anti-Corruption policy and practice will be forced from November 6, 2026 onwards and cancel all previous version of the Anti-Corruption policy.

THANTAWAN

Gifts, assets or benefits registration form

Document number _____

Date _____

Givers	Details of gifts/assets or other benefits	Receivers	Value		Supervisors	Remark
			<3,000 Baht	>3,000 Baht		

Signed _____ Givers

_____

Date _____

Signed _____ Receivers

_____

Date _____