



Anti-Corruption Principle and Policy

Srisawad Corporation Public Company Limited



Anti-corruption policies and practices.

Srisawad Corporation Public Company Limited and its subsidiaries are committed to conducting business with transparency, good governance, and in accordance with the principles of good corporate governance. To demonstrate this commitment, the company has prepared "**Policies and practices against corruption**" with the objective and commitment to conducting business with a strong emphasis on anti-corruption, and striving to comply with laws on preventing and combating fraud and corruption, including bribery, against government officials both domestically and internationally, or officials of private sector organizations, as well as supporting and promoting a sense of responsibility against all forms of corruption among the board of directors, executives, and personnel at all levels.

This policy establishes key principles and standards for preventing and combating all forms of corruption, including practices compliant with laws, regulations, and international standards. This aims to help everyone act correctly and confidently as members of the organization. On behalf of the Chairperson, I sincerely hope that everyone will strictly adhere to this policy and invite you all to contribute to building a corporate culture that upholds honesty, transparency, and accountability.

If you have any questions or suggestions regarding policy compliance, please do not hesitate to consult the Internal Control and Audit Department or other relevant departments so that we can all work together to strengthen these aspects, anti-corruption in all its forms of the organization

Thank you to everyone who has cooperated to the best of their ability in adhering to the anti-corruption policy.

Mr. Sukont Kanjanahuttakit

Chairman of the Committee



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Anti-Corruption Policy

Srisawad Corporation Public Company Limited ("the Company") conducts its business with a strong focus on combating corruption, upholding ethical principles, managing its operations with transparency, and being accountable to all stakeholders. The Company recognizes the importance of not abusing its authority, and not violating any laws, ethical guidelines, regulations, or company policies. To ensure that the Company's operations align with the principles and definitions of corruption, the Company has established an Anti-Corruption Policy as a guideline for its implementation, as follows:

1. Definition

"Fraud" This refers to any act performed to obtain an unlawful benefit for oneself or others, including embezzlement, falsifying accounts, and corruption.

"Corruption" This refers to any act, whether offering, promising, requesting, demanding, giving, or receiving property or other benefits to a government official or any other person doing business with the Company, directly or indirectly, in order to induce such person to perform or refrain from performing their duties, or to obtain or retain any other benefits that are not commercially viable, or to provide convenience, except where such act is permitted by law, regulations, rules, local customs, or trade practices.

"Bribery" The giving, offering, or performance of any money, property, or other benefit to such person in order to induce them to act or refrain from acting, or to abstain from performing their duties, in order to obtain or retain benefits that are inappropriate for business purposes, illegal, unethical, or that may harm the company's image.

"Gift-giving, hospitality costs, entertaining, travel expenses, and other expenses." This refers to the giving of gifts, hospitality fees, entertainment expenses, travel expenses, and other expenses that do not affect the company's performance but comply with applicable laws. These gifts are given on behalf of the company, not on behalf of employees, and are appropriate for special occasions such as New Year's, which is considered a normal practice and is done openly.

"Accepting gifts, property, bribes, or any other benefits." This refers to the acceptance of gifts, property, bribes, or other benefits that do not affect the company's operations, are in accordance with applicable laws, are accepted on behalf of the company (not on behalf of an employee), are appropriate for festive occasions such as New Year's (a normal and open custom), and are accepted out of necessity that cannot be refused, to maintain good business relationships, or for any other reason.

"Convenience fee" This refers to a form of payment or giving money to government employees to expedite or support the execution of procedures beyond the normal process, without requiring the discretion of the government employee and as an act within their official duties. It also includes rights that legal entities are entitled to under the law, or to obtain business advantages or benefits.



"Hostess and reception services" This refers to the expenses incurred in conducting activities to build good relationships or, in some cases, as an expression of social etiquette. Hospitality and reception services may include accommodation costs, transportation costs, travel expenses, or food and beverage expenses, etc., must not affect decision-making or create a conflict of interest.

"Conflict of interest" This refers to a conflict of interest, whether direct or indirect, between personal and corporate interests. It encompasses situations or actions by directors, executives, employees, and staff of a company where personal interests are involved, affecting their decision-making or the performance of their duties, ultimately impacting the public interest. Examples include nepotism and cronyism, such as awarding contracts exclusively to associates or supporters, or hiring former government officials to leverage their information, influence, or connections (revolving door).

"Charity donation" This refers to activities involving the spending of money without any tangible return.

"Donations for public benefit" This refers to spending money on projects and activities that benefit the community, society, or groups of people, where the company may not receive tangible returns.

"Political Contributions" This refers to assistance provided on behalf of a company, whether financially or in other forms, to support political activities. Financial assistance can include loans. Other forms of assistance (in-kind) include providing goods or services, advertising or promoting a political party, purchasing tickets to fundraising events, or donating to organizations closely associated with a political party, etc. However, this excludes support for democratic processes which is permissible under the law.

"Sponsorships" This refers to the giving or receiving of monetary or non-monetary gifts to clients, business partners, business representatives, or other individuals with the objective of benefiting the company's business, reputation, or business relationships. This may be linked to bribery, such as sponsorship money that may have a hidden purpose, using charity sports or charitable organizations as a cover to gain an unfair advantage in the decision-making process of government officials or related parties. (Examples of unfair advantages include promising business opportunities or bids, reducing or waiving fees, providing assistance or waiving licensing requirements that do not conform to normal government decision-making processes, waiving or reducing legal requirements, or providing or assisting in accessing government officials.)

"Extortion, fraud, coercion, threats, deception, conspiracy, collusion, embezzlement, money laundering, and other similar acts." This refers to the dishonest use of authority to commit acts such as extortion, fraud, deception, coercion, threats, conspiracy, collusion, embezzlement, money laundering, and other similar acts. These are considered prohibited acts under the law, are explicitly forbidden, and constitute a breach of duties and responsibilities assigned in one's capacity as a director, executive, or employee of the company.

"Business representative" mean Any other legal entity or individual who is not an employee of the company, whom the company has hired or agreed to conduct transactions or contact with external parties on behalf of the company.



"Business partners" This refers to individuals who conduct transactions with the Company to support or promote business with the Company, such as suppliers, brokers, and service providers to the Company.

"Employment of government employees" This means that the employment of government personnel for the company creates a risk of corruption in terms of conflicts of interest for individuals with roles and responsibilities in both organizations.

"Government officials" This refers to "government officials" as defined in the Anti-Corruption Act, and includes civil servants, officials, state enterprise employees, employees, agents, or any other person representing the following agencies:

- Ministries, departments, or government agencies (e.g., Customs Department, Immigration Bureau, etc.)
- International organizations (e.g., the World Bank, the International Monetary Fund, etc.)
- Political parties, political officeholders or election candidates (both government and opposition), and local administrators.
- Regulatory authorities (e.g., the Securities and Exchange Commission, the Bank of Thailand, the Stock Exchange of Thailand)
- State enterprises, or other companies or organizations owned or controlled by the state or a state agency.

"Related parties" This refers to the spouses, children, parents, siblings, and close relatives of the directors, executives, and employees at all levels of the company and its group companies.

"The company" This refers to Srisawad Corporation Public Company Limited.

"Group of Companies" This refers to Srisawad Corporation Public Company Limited and its subsidiaries.

2. Anti-Fraud and Anti-Corruption Policy.

2.1 The company's directors, executives, and employees must not solicit, engage in, or accept corruption in any form, whether directly or indirectly, for the benefit of the organization, for oneself, family, friends and acquaintances, or for the benefit of the business, encompassing all businesses in all countries and all related entities of the company, including business dealings with various entities, whether government agencies, state enterprises, or private companies. Both domestic and international operations must be conducted transparently, fairly, and in accordance with all applicable laws, including those of Thailand and the foreign countries with which the company conducts business.

2.2 The company must regularly review its compliance with this anti-corruption policy, as well as revise its practices and operational requirements to align with changes in business, regulations, and legal requirements. Any violation will be dealt with accordingly. Anyone found to be supporting, assisting, or cooperating with corruption will be subject to disciplinary action according to company regulations. Furthermore, they may face legal penalties if the action is illegal.



3. Responsibilities

3.1 The company's board of directors is responsible for establishing and approving anti-corruption and good corporate governance policies, including implementing effective anti-corruption systems to ensure management is aware of the importance of this initiative. And it has been implemented and has become part of the company culture.

3.2 The Audit Committee is responsible for reviewing the company's adequate internal controls, including financial and accounting reporting systems, internal control systems, internal audit systems, and risk management systems. It also reviews operations to ensure compliance with the anti-corruption policy, relevant regulations and laws, and international standards, ensuring they are rigorous, appropriate, up-to-date, and effective.

3.3 The Risk Management Committee is responsible for assessing risks in each activity that may not comply with the anti-corruption policy.

3.4 The Chairman, CEO, management, and executives have the duty and responsibility to establish systems, promote, support, and oversee compliance with anti-corruption policies and regulations among all employees and stakeholders, as well as to review the appropriateness of systems and measures to ensure they align with changes in business, regulations, and legal requirements.

3.5 The Internal Audit Department is responsible for auditing and reviewing operations to ensure they are correct and in compliance with policies, guidelines, procedures, and relevant laws, in order to ensure that appropriate and adequate internal controls are in place to address potential corruption risks, and to report to the Audit Committee.

3.6 The company directors, executives, and employees are obligated to comply with this anti-corruption policy and to refrain from any involvement in corruption, whether directly or indirectly.

3.7 The subcommittee is responsible for reviewing policies as appropriate to align with changes in business, regulations, and relevant laws, and for approving amendments for submission to the board of directors. It also oversees the implementation of effective anti-corruption measures.

3.8 Senior management, led by the Chief Executive Officer and Managing Director, is responsible for disseminating these anti-corruption measures to employees for implementation within the organization.

3.9 Subsidiaries, associated companies, business partners, or business representatives of the company under the company's control must agree to comply with the company's anti-corruption and anti-bribery policy.

4. Scope and procedures

The company requires its directors, executives, and employees at all levels to exercise due diligence in dealing with forms of corruption as follows:

4.1 Do not engage in or participate in any form of corruption, whether directly or indirectly.



4.2 Ensure thorough communication among board members, executives, and employees, and that all processes strictly adhere to legal regulations. If errors occur in operations due to negligence or lack of knowledge, penalties should be imposed as prescribed by law.

4.3 The company's directors, executives, and employees will not engage in or support corruption under any circumstances, and will strictly adhere to anti-corruption measures.

4.4 The company's directors, executives, and employees are required to report any acts of fraud or corruption related to the company to their supervisors or responsible persons, and to cooperate with any investigations into the facts.

4.5 The company will ensure fairness and protect whistleblowers who report corruption, as well as individuals who cooperate in reporting and in the investigation of corruption.

4.6 Individuals who engage in corruption will face disciplinary action in accordance with company regulations and may also be subject to legal penalties for their offenses.

4.7 The company's directors, executives, and employees are responsible for complying with the good governance and anti-corruption policies. The board of directors has instructed management to communicate and implement the anti-corruption measures.

4.8 Company directors, executives, and employees are prohibited from soliciting or accepting any property or other benefits for themselves or others that may induce them to perform or refrain from performing their duties, or that may cause the company to lose legitimate interests. This also includes prohibiting company directors, executives, and employees from giving or offering to give property or other benefits to outsiders to induce them to perform or refrain from performing any act that is illegal or improper in their official capacity, or in exchange for undeserved privileges as follows:

- **Giving and receiving bribes**

It is strictly prohibited to give or receive bribes in any form in exchange for business benefits, and it is prohibited to authorize others to give or receive bribes on one's behalf.

- **Business relationships and procurement with the government sector.**

The company's operations and interactions with the government must be transparent, honest, and conducted in accordance with all applicable laws.

- **Gifts, entertainment, and other benefits.**

Giving or receiving gifts, property, entertainment, or any other benefits from customers, business partners, or persons related to the company must comply with company regulations.

- **Providing political assistance.**

The company has a policy of not assisting, supporting, or condoning any political party, political group, or politician, directly or indirectly.

- **Accepting donations; charitable donations. Public benefit and the giving or receiving of financial support.**



The company stipulates that the acceptance of donations, charitable contributions, public benefit activities, and the giving or receiving of financial support must comply with the following requirements:

(1) It must be transparent, legal, and ethical, and must not involve any actions that would harm society as a whole.

(2) It must not be related to, or be used as an excuse for, bribery.

(3) The process for reviewing and approving charitable donations must be followed. Public benefit or financial support as per company regulations.

(4) In case of any doubts that may have legal implications, seek written legal advice. For other important matters, the decision of management will be made at its discretion.

4.9 Create a corporate culture that is honest and committed to fairness.

4.10 We provide internal training to promote integrity in the performance of duties and to ensure that employees strictly adhere to the principles and ethics of good corporate governance throughout the organization.

4.11 Establish a human resource management process that reflects the company's commitment to anti-corruption measures throughout the entire process, from personnel selection and training to employee performance evaluation, compensation consideration, and promotion.

4.12 Establish disbursement and procurement regulations, defining approval limits, purpose of transactions, and recipients who must provide clear supporting documentation. Appropriate approval authority should be defined at each level.

4.13 Internal audits are conducted to ensure that the internal control system helps the company achieve its set goals, including reviewing the operations of all departments to ensure compliance with requirements and regulations, identifying deficiencies and weaknesses, and providing recommendations for improving the efficiency and effectiveness of operational systems in accordance with good corporate governance principles.

4.14 To cooperate with the government in requiring all relevant agencies that interact with the government to disclose their income and expenditure accounts to the National Anti-Corruption Commission ("NACC")

4.15 The company secretary, internal auditor, or any other person as appropriately assigned by the Audit Committee, is designated as the person responsible for ensuring good corporate governance.

5. Non-compliance with anti-corruption policies.

5.1 The company has established disciplinary measures against directors, executives, and employees who fail to comply with anti-corruption measures. These measures include dismissal from office for directors, disciplinary action for executives and employees according to established procedures, and legal



action, including all applicable laws, rules, regulations, and corporate governance practices related to such misconduct.

5.2 If individuals associated with the group of companies, or customers, business partners, or agents, fail to comply with anti-corruption measures, the company may consider terminating any transactions with such individuals, customers, business partners, or agents.

6. Channels for reporting or filing complaints about corruption.

The company provides channels for complaints, reporting of information, or feedback, allowing employees and all stakeholders to file complaints, report information, or express opinions in order to improve personnel development and management, as stipulated in this anti-corruption policy and guidelines.

7. Measures for protection and confidentiality.

The company upholds fairness and protects complainants and informants who act in good faith. A working group will be appointed to investigate and follow up on all information received. All information, complaints, and supporting documents from complainants and informants will be kept confidential.

8. Review, verification, and improvement.

The company mandates an annual review, examination, and revision of its anti-corruption policy and other related policies, or immediate amendments if significant changes occur.

This Anti-Corruption Policy was approved by the Board of Directors meeting No. 2/2025 on February 26, 2025.

Mr. Sukont Kanjanahuttakit)

Chairman of the Board

Srisawad Corporation Public Company Limited



Guidelines for Anti-Fraud and Anti-Corruption.

1. Introduction

Srisawad Corporation Public Company Limited is committed to conducting business with transparency and in accordance with the law, and pledges not to support corruption in any form. This ensures that the company's operations adhere to the principles of good corporate governance. Furthermore, the company has a policy to encourage its directors, executives, and employees to strictly comply with the law, and to promote ethical and transparent business practices among its business partners, free from corruption. This is to prevent corruption in all of the company's business activities and to ensure that decisions and business operations that may involve corruption are considered and implemented carefully.

2. Objectives of the Anti-Corruption Measures Handbook.

This Anti-Corruption and Bribery Measures Guidelines are established in writing and disseminated both internally within the company and on the company website, with the following objectives:

1. To promote and support the participation of the company's board of directors, management, and employees in preventing and combating all forms of corruption, whether direct or indirect, by fostering awareness and prioritizing anti-corruption until it becomes part of the company culture.

2. To demonstrate the company's and its subsidiaries' commitment to combating all forms of corruption, the company has established responsibilities, guidelines, and appropriate procedures to prevent corruption in all company activities.

3. To build trust among stakeholders in conducting business together with honesty and integrity.

4. To provide clear guidelines for conducting business operations and developing the organization towards sustainability.

3. Scope

This anti-corruption and anti-bribery measure guideline applies to all directors, executives, and employees at all levels of Srisawad Corporation Public Company Limited without exception or discrimination. The company expects its customers, business partners, business representatives, and all related parties to strictly adhere to this policy in combating corruption.

4. Non-tolerance of corruption.

The company will not tolerate any actions that may lead to fraud, even if such actions benefit the company. To ensure that company personnel do not condone fraud, all personnel must understand and strictly adhere to the anti-corruption policy, corporate governance policy, business ethics and work conduct guidelines, anti-corruption practices, relevant process manuals, and other company policies without exception. The company



is committed to conducting thorough and appropriate investigations into all suspected fraud cases, regardless of any external factors. (For example, the accused's job title, length of employment at the company, or internal company relationships.) The company will conduct an impartial and unbiased investigation in accordance with its guidelines on handling fraud cases. / Violations of company regulations are illegal. Furthermore, the company will punish offenders to the fullest extent of the law. If the investigation reveals that personnel were aware of the fraud but neglected to report it, the company will consider disciplinary action against those personnel as well. However, the company will protect the safety of whistleblowers and will ensure fairness and protection for company personnel who deny involvement in fraudulent activities or report fraud related to the company. The company will not demote, punish, or negatively impact employees who deny corruption, even if such action results in lost business opportunities for the company.

5. Roles, responsibilities, and duties.

To ensure clear guidelines for the company's anti-corruption measures, the roles, responsibilities, and duties of those involved have been defined as follows:

5.1 The company's board of directors. Their duties are as follows:

- 5.1.1 Establish and approve anti-corruption policies.
- 5.1.2 Approve and review guidelines for anti-corruption measures.
- 5.1.3 Oversee the establishment of effective anti-corruption systems.

5.2 Audit Committee Their duties are as follows:

- 5.2.1 Review to ensure the company has adequate internal controls.
- 5.2.2 Review and ensure effective implementation of anti-corruption policies.

5.3 Chairman of the Board, Chief Executive Officer, and Managing Director. Their duties are as follows:

- 5.3.1 Promote, support, and oversee compliance with anti-corruption policies, anti-fraud and anti-bribery measures, and related procedures by all employees and stakeholders, and communicate these to all employees and stakeholders.
- 5.3.2 Review the appropriateness of systems and measures to ensure compliance with changes in business, regulations, and legal requirements.

5.4 Executives at the director level and above. Their duties are as follows:

- 5.4.1 Control and supervise the effective implementation of anti-corruption measures. This includes identifying risks, monitoring, and managing them to ensure adequate measures are in place to address problems appropriately, quickly, and in a timely manner.
- 5.4.2 Support the development of processes, including personnel, to ensure that the organization's anti-corruption measures are effective.

5.5 Employees Their duties are as follows:



5.5.1 Understand and comply with anti-corruption measures, including other measures (if any), and participate in training as required by the company.

5.5.2 Report any suspicious or witnessed acts of corruption immediately and cooperate in investigating the facts related to suspected acts of corruption.

5.5.3 Employees must not be involved in corruption, whether directly or indirectly, and must strictly adhere to the company's measures and procedures, especially employees involved in core processes with a high risk of corruption, such as procurement, loan processing, employee recruitment, and finance.

5.6 Internal Control and Audit Department Their duties are as follows:

5.6.1 Review and verify that operations are conducted correctly and in accordance with relevant policies, measures, procedures, and laws, ensuring that appropriate and sufficient internal controls are in place to mitigate potential corruption risks, and report to the Audit Committee.

5.6.2 Develop a corruption risk assessment tool and have internal departments assess corruption risks.

5.6.3 Summarize the risk assessment and present it to the enterprise-level Risk Management Committee.

5.6.4 Compile measures and guidelines for controlling corruption risk as considered by the department, and review corruption risks annually.

5.7 Human Resources Department Their duties are as follows:

5.7.1 Manage human resources in accordance with the company's anti-corruption measures.

5.7.2 Establish selection processes, orientation, training, and penalties related to anti-corruption practices.

5.7.3 Promote a culture of anti-corruption practices, including avoiding actions that may constitute corruption.

5.7.4 Communicate and disseminate anti-corruption policies, measures, and related activities to raise awareness of honest and corruption-free work practices.

5.8 Finance and Accounting Department Their duties are as follows:

5.8.1 Record and maintain information and documents related to income, expenditure, and tax accounts.

5.8.2 Implement financial and accounting procedures in accordance with generally accepted accounting standards.

5.8.3 Implement expense reimbursement controls in accordance with regulations and procedures for expense reimbursement, the operational expense approval manual, and in compliance with anti-corruption measures.

5.9 Purchasing Department Their duties are as follows:



5.9.1 Review the background of business partners, especially vendors, contractors, and service providers to verify their credibility, financial status, reputation, and qualifications related to the goods or services of business stakeholders. This includes verifying that business partners have policies and practices consistent with international human rights principles, do not use child labor or forced labor, and are not involved in money laundering or other illegal activities, in accordance with the company's anti-money laundering and counter-terrorism financing and counter-proliferation of weapons of mass destruction policies. This ensures the transparency of the company's supply chain and adherence to the company's ethical business partner code.

5.9.2 Communicate policies, practices, and regulations related to anti-corruption to business stakeholders or business partners of the company.

5.9.3 Comply with anti-corruption policies and guidelines related to corruption.

5.10 Risk Management Department Their duties are as follows:

5.10.1 Assessment and analysis of corruption risks to identify potential risks in each department of the organization, including assessing the severity of the risks and the likelihood of their occurrence. Develop a corruption risk management plan that defines measures to prevent and mitigate potential risks.

5.10.2 Establish a comprehensive enterprise-wide risk management framework to ensure that risk management objectives are met, and to monitor and evaluate the implementation of the risk management plan and review risk measures to ensure their effectiveness in preventing and addressing corruption.

The company considers it the responsibility of all personnel, from general staff to the board of directors and executives, to understand and comply with the anti-corruption policy, guidelines, and regulations related to anti-corruption, as well as this guideline, without exception. Violation or non-compliance with these policies, guidelines, and regulations may result in disciplinary action.

6. Measures to prevent corruption.

Fraud risk assessment, the development of anti-corruption policies, the design and implementation of appropriate internal controls to mitigate fraud risks, and the cultivation of anti-corruption awareness and values among company personnel are crucial factors that can help a company prevent fraud within the organization.

6.1 Fraud risk assessment.

The purpose of a fraud risk assessment is to encourage all departments within the company to proactively identify, assess, and review organizational fraud risks, as well as to raise awareness of potential fraud risks and their impact on the organization's objectives and operations. This ensures that fraud risks are identified and managed in a timely manner. However, management from all departments must cooperate by providing



information on potential fraud risks within their respective units. The fraud risk assessment consists of three main steps:

6.1.1 Preparation for establishing risk measurement criteria in terms of impact and likelihood of occurrence, as well as determining the organization's acceptable risk level (Risk Appetite).

6.1.2 Risk Identification: Identify existing internal controls. Assess the current internal control system. Analyze the severity and likelihood of risks arising after the implementation of current internal control measures.

6.1.3 Implement measures to reduce risk to an acceptable level for the organization if current internal controls are insufficient to prevent fraud risk.

Therefore, the company designates the Risk Management Department to advise management on fraud risk assessments, as well as to compile the results of anti-fraud risk assessments for the preparation of the organization's fraud risk documentation. The risk-owning unit is responsible for reporting the implementation of the risk management plan to the Risk Management Department, which then reports the status of operations to the Executive Committee and the Board of Directors every quarter.

However, the risk management department is only responsible for advising and gathering risk information. Identifying and assessing risks, as well as providing measures to mitigate or manage them, is the direct responsibility of the management of each department within the organization. In addition, the audit office is responsible for evaluating the adequacy and effectiveness of the internal controls identified during the risk assessment. If the internal controls identified by the risk-owning department are insufficient or ineffective, the audit office can provide opinions and recommendations to management to implement additional internal controls to reduce the risk to an acceptable level for the organization.

The company assesses and reviews its fraud risk annually to identify increases in risk or changes in the level of risk that affect the year. This change can result from various factors such as changes in operational processes, the adoption of new information technology systems, changes in the roles and responsibilities of personnel, or new methods of fraud.

6.2 Formulating policies related to anti-corruption.

The company has established policies, guidelines, regulations, and operating procedures, such as the corporate governance policy, anti-corruption policy, anti-corruption guidelines, charitable donation guidelines, funding guidelines, regulations regarding entertainment expenses, gifts and favors, business ethics, and work conduct guidelines, etc., to ensure that company personnel understand the principles of good corporate governance, ethical principles, and best practices, as well as to foster awareness, a sense of responsibility, and values in combating corruption.

6.3 Communication and Training

Communication and training are essential in anti-corruption measures to build knowledge, understanding, and awareness of the importance of complying with policies, guidelines, and procedures related to anti-corruption. This promotes participation in organizational corruption risk management, enabling company personnel to



contribute to the detection and prevention of corruption within the organization. Furthermore, it facilitates communication with business stakeholders, individuals with business transactions or interests in the company, and the general public to demonstrate a commitment to combating corruption and transparency in the company's operations. The company has established procedures for communicating relevant policies, guidelines, requirements, practices, and procedures as follows:

6.3.1 Prepare a written annual anti-corruption policy and measure communication plan. This plan must cover both internal and external communications.

6.3.2 Determine appropriate communication channels, such as internal newsletters, billboards, advertisements, brochures, or training sessions, for both internal and external recipients of the message.

6.3.3 Determine the communication frequency for each channel.

6.3.4 The communication content should cover anti-corruption measures, policies, guidelines, and related procedures; company expectations regarding compliance with these policies, guidelines, and procedures; fairness and protection for company personnel who refuse to engage in corrupt practices or report corruption related to the company; and penalties for non-compliance with these measures.

6.3.5 Implement communications according to the annually approved communication plan.

To ensure the effectiveness of communication, the established communication plans and channels should be reviewed and evaluated in accordance with the internal control system by the audit department. Furthermore, communicating policies, practices, and procedures related to anti-corruption is the responsibility of the Human Resources department. This communication plan must include training on anti-corruption policies, guidelines, and procedures during new employee orientation, as well as ongoing annual training for company personnel as follows:

Company Board

The company will provide information on its anti-corruption policy to all directors, and new directors will also receive orientation on the anti-corruption policy.

employee

- New employees will receive training on anti-corruption policies during their onboarding period to guide them in performing their duties correctly and appropriately.
- Current employees will receive regular training on anti-corruption policies to ensure they understand proper work practices, are aware of various forms of corruption, the risks of participating in corruption, and how to report any suspected or witnessed corruption, etc.

Business partners, business representatives, distributors/service providers, and contractors.

The company will communicate its anti-corruption policy to its business partners, business representatives, distributors, and contractors from the beginning of business relationships and as appropriate thereafter. The company encourages its business partners, business representatives, distributors/service providers, and contractors to uphold the principles of combating corruption.



6.4 Reviewing the backgrounds of personnel and business stakeholders.

Background checks of personnel and business partners are crucial for effective fraud prevention. The company assigns the Human Resources department the responsibility of reviewing personnel backgrounds prior to employment, performance evaluations, compensation considerations, and promotions. The Procurement department, responsible for purchasing, reviews the background of individuals who will conduct business transactions with the company prior to the commencement of contracts or transactions. These reviews can be conducted as appropriate under applicable laws and with the consent of the personnel, business partners, or representatives, as follows:

6.4.1 Background checks before employment to verify the qualifications, suitability, and experience of job applicants, as well as information regarding past fraudulent activity of individuals applying to the company.

6.4.2 Background checks of personnel before assigning them to key positions within the company are conducted to verify their qualifications, experience, financial credibility, references, and any potential conflicts of interest arising from the new position, as well as to consider compensation and employee performance evaluations.

6.4.3 Background checks will be conducted on individuals and businesses that will conduct transactions with the Company, particularly vendors, contractors, and service providers. This includes verifying their credibility, financial status, reputation, and business terms, as well as ensuring that partners adhere to policies and practices consistent with international human rights principles, do not use child labor or forced labor, and are not involved in money laundering or other illegal activities, in accordance with the Company's anti-money laundering and counter-terrorism financing and counter-proliferation of weapons of mass destruction policies. Furthermore, the company will examine the partners' business ethics and any information regarding past fraudulent activities by individuals and businesses that will conduct transactions with the Company.

Furthermore, the company board and executives, as defined in the Capital Market Supervisory Board's regulations, must report any conflicts of interest to the company secretary's office within the specified timeframe, annually and whenever there are changes, using the prescribed form.

6.5 Internal Controls

Internal controls are operational processes jointly established by the company's board of directors, management, and personnel at all levels to provide reasonable assurance that the defined methods or operations will help the company achieve its objectives. Therefore, internal controls are considered a primary tool for preventing fraud in the operational processes of all departments. Management in each department must design appropriate internal controls for the processes under their responsibility to manage and reduce fraud risks identified in the fraud risk assessment to an acceptable level for the organization. Furthermore, they must communicate, ensure understanding, and monitor the implementation of the established internal control system by personnel within their departments.



The company has established written procedures or key operational processes for review and approval by management. These procedures take into account a clear segregation of responsibilities for personnel in following them, ensuring transparency, independence, and the prevention or detection of fraud risks. These documents are stored in accessible channels for all relevant personnel and communicated regularly.

Furthermore, management in each department should regularly review work procedures or processes, or whenever there are significant changes affecting operations, to ensure that these procedures and processes comply with good internal control principles. The company designates the Internal Control and Audit Department to assess the adequacy, appropriateness, effectiveness, and efficiency of the organization's internal controls, and to provide recommendations and solutions to improve/develop internal controls. This ensures that internal controls are effective and efficient, preventing and detecting potential risks, particularly fraud risks. The Audit Department must discuss the audit results with the management of the audited department to understand and provide appropriate and implementable improvements and developments to internal controls. The audit results must also be reported to the Audit Committee quarterly. Each department's management is responsible for implementing the recommendations provided by the Audit Department to improve and develop their operations.

Initiating anti-corruption measures, the Internal Control and Audit department is responsible for assessing the design and effectiveness of internal controls for such measures and reporting the audit findings to the Audit Committee.

6.7 Business Ethics and the Fight Against Corruption

The company adheres to ethical business practices as a core principle in combating corruption. Ethical business practices are applied throughout various operational processes, including human resource management. This includes rewarding and punishing those who violate ethical standards, and promoting career advancement with ethical considerations as a key factor in promotions and annual performance evaluations.

The company has measures in place to protect personnel who adhere to business ethics and reject corruption. Personnel will not be punished or negatively impacted in any way for their refusal, such as being demotion, disciplinary action, or any other form of punishment for corruption, even if such action results in lost business opportunities for the company. All directors and personnel will be informed of any violations of business ethics, including other policies related to this anti-corruption policy and practices, which will result in penalties ranging from deductions in performance points to termination, in accordance with the company's disciplinary regulations and penalties, regardless of whether the company may benefit from such fraudulent use of authority.

6.8 Enforcement of anti-corruption policies and practices.

1. Anti-corruption policies and practices are binding on the board of directors, management, and employees. The company's policies and guidelines on anti-corruption are effective from the date the board of directors approved them. Corruption



2. Any amendments, revisions, changes, interpretations, or cancellations must be approved by the company's board of directors beforehand.

3. This policy extends to business representatives, partners, or any person acting on behalf of the Company and its subsidiaries. Any business partner, associate, or individual acting on behalf of the Company or its subsidiaries who violates this policy will have their contract terminated.

6.9 Data recording and storage processes.

The company's processes for recording and maintaining critical data are accurate, complete, transparent, and auditable. Effective and reliable internal controls and audits are in place under the supervision of the Audit Committee. Data recording and maintenance practices comply with relevant communication and disclosure policies, announcements, regulations, and other relevant policies.

7. Procedures for handling whistleblowing and complaints.

A sound whistleblowing and complaint handling process can help reduce the likelihood of fraud to some extent. However, the company has implemented fraud detection measures to help detect and report potentially fraudulent activities in a timely manner. Therefore, the whistleblowing mechanism and fact-finding investigations are key activities that help the company detect fraud. Furthermore, to ensure that the fraud detection measures are appropriate, effective, and efficient, the Internal Control department regularly reviews and audits the internal controls of these measures annually. These fraud detection measures comprise two main activities:

7.1 Mechanism for reporting incidents or providing information.

The company has established reliable and independent channels for reporting fraud, providing opportunities for everyone, whether company personnel or external individuals, to report information promptly. Furthermore, it has implemented whistleblower protection processes to safeguard informants from subsequent harm or intimidation, thereby fostering confidence and a sense of security among company personnel in reporting incidents or information regarding fraud.

Therefore, company personnel are obligated to report any incidents or leads regarding fraud through the channels designated by the company. The company will penalize personnel who know of or possess information about potential fraudulent events but fail to inform the responsible person. The company has measures in place to protect whistleblowers who report information truthfully and in good faith, and will consider compensation for any damages that the whistleblower may suffer. However, the company will penalize those who intentionally provide false information. Whistleblowers who wish to remain anonymous must provide sufficient information for the company to consider the facts as follows:

Whistleblowers, if they choose not to reveal their identity, must provide sufficient information for consideration.

- Facts
- Name of the suspect.
- Date and time the event occurred.



- Location where the incident occurred.
- The overall environment in which the event occurred.
- The expected frequency of events.

The company has established channels for reporting incidents or providing information when company personnel or external parties suspect actions that violate or fail to comply with company policies, regulations, and orders. This information can be reported promptly through the following channels.

- Inform directly to the Chairman of the Board, Chief Executive Officer and Managing Director.
- Notify directly to the Chairman of the Audit Committee through the Secretary of the Audit Committee.
- Notify via email: AC@srisawadpower.com
- Report it via the whistleblowing form./ Corruption complaints on the company website.

7.2 Fact-finding investigation.

Upon notification of an incident or tip-off regarding corruption, or when an incident of corruption occurs, the Audit Office and/or Human Resources Department will conduct an initial investigation. If there is merit to the allegations, a fact-finding committee will be appointed, and action will be taken in accordance with the guidelines for handling acts of corruption/illegal activity. However, if the company lacks sufficient resources or deems it appropriate to procure other resources.

Experts may conduct investigations in place of in-house personnel. The company may consider hiring qualified external individuals for the investigation process. The fact-finding committee must operate fairly and not disclose information to unrelated parties, including reporting the investigation results to the board of directors. Furthermore, if the fact-finding committee encounters obstacles in its work that may affect the company, it must report such matters to the board of directors for timely resolution.

7.3 Punishment and Corrective Measures

7.3.1 Penalties: The Company is committed to promoting a sense of transparency, integrity, and ethical conduct among its directors, executives, and employees at all levels, and to combating all forms of corruption, both direct and indirect. This anti-corruption policy and measures are communicated and disseminated to all directors, executives, employees at all levels, and the general public. The Company also promotes and develops knowledge and understanding of these policies for rigorous implementation. Therefore, failure to comply constitutes a disciplinary offense under Company regulations and is subject to disciplinary action. Ignorance of these measures cannot be used as an excuse for non-compliance. Furthermore, in cases where corruption results in legal consequences, the Company reserves the right to take legal action against the perpetrators.

7.3.2 Corrective Measures: Upon completion of the investigation, the fact-finding committee, together with the management of the originating organization and relevant agencies, will consider corrective measures for the fraud incident. These measures may include improving or supplementing company policies, enhancing or supplementing internal controls, or changing work procedures, etc. Corrective measures will be defined for



each case, along with a timeframe for implementation, and presented to the highest-ranking management of the originating organization and relevant agencies for implementation.

7.4 Reporting Corruption

The fact-finding committee must summarize cases of corruption or illegal acts, as well as reach a conclusion, and notify the committee secretary to compile the corruption cases for presentation to the committee for quarterly reporting to the company board. Immediate reporting is also required in urgent or serious cases requiring immediate action. All information in the report must be kept confidential and reported only to the designated authorized person. Disclosure of information in any form to unrelated agencies or individuals is strictly prohibited. Periodic reporting, including immediate status updates, is required as follows:

1. Notification of results to whistleblowers and complainants of corruption, data collection, and corrective actions: If the complainant discloses their identity, they will be notified within 7 working days from the date of the conclusion. If the complainant does not disclose their identity, the investigation, fact-finding, and conclusion process will take time depending on the complexity of the facts, and results will be reported promptly from the date of the conclusion.
2. Upon completion of the investigation, the company will inform the whistleblower of the results of the investigation.
3. The Head of Internal Audit or the person assigned to handle the complaint will inform the whistleblower and the complainant of the outcome of the investigation (if the whistleblower and complainant have requested feedback).
4. The Head of Internal Audit or their designated representative shall handle complaints, maintain confidential records of the actions taken regarding such complaints, compile a statistical report on the matter, and report it to the Audit Committee and the Board of Directors.
5. The management at the level according to which the complaint was filed must prepare a corrective action plan and measures to prevent recurrence and report it to the Executive Committee and the Audit Committee.

7.5 Data Storage

7.5.1 The company has a policy to comply with all applicable standards, principles, and laws regarding accounting and financial reporting.

7.5.2 All expenses must be supported by documentation and approved according to the authorized approval authority. Furthermore, the storage and maintenance of company data must comply with all applicable laws and regulations.

7.5.3 The company does not permit the recording of false, incomplete, incorrect, or manipulated accounting records, nor shall there be any off-financial accounts used to support or conceal inappropriate payments.



8. Measures to respond to corruption.

8.1 Employees must not neglect or ignore any work practices that conflict with company regulations or orders, or witness or suspect acts of corruption related to the company. Employees must inform their supervisors or the responsible person of such information. If there are any questions or concerns, employees may seek advice from their supervisors.

8.2 Individuals who witness or suspect acts of corruption, or who are affected by anti-corruption efforts, may report information or file a complaint through one of the company's channels as follows:

Contact channels for reporting information and complaints.

- 1) Notify directly to the Chairman of the Board, Chief Executive Officer and Managing Director.
- 2) Notify directly to the Chairman of the Audit Committee through the Secretary of the Audit Committee.
- 3) Inform your superior.
- 4) In cases involving senior management or company directors, please report the matter directly to the Chairman of the Audit Committee.
- 5) Send the complaint letter to the recipient, either the Chairman of the Audit Committee, the Chairman of the Nomination and Remuneration Committee, the Company Secretary, the Head of Internal Audit, or the Head of Human Resources, at the following address:

By mail: Srisawad Corporation Public Company Limited
99/392 Soi Chaengwattana 10, Intersection 3 (Benjamit), Chaengwattana
Road, Thung Song Hong Subdistrict, Lak Si District, Bangkok 10210

Via electronic mail: AC@srisawadpower.com

Those entitled to report or file complaints regarding corruption.

Individuals who can report or file complaints about corruption include all stakeholders of the company, including shareholders, customers, competitors, creditors, the government, the community, society, management, and employees. Regardless of the method of reporting as described above, the company will maintain the confidentiality of your information.

8.3 Employees are required to cooperate in investigations and provide factual information in cases where they witness acts that may constitute corruption.

8.4 The company will provide fairness and protection to employees who report or deny corruption as stipulated in the regulations regarding whistleblowing and complaints of fraud and corruption.

9. Measures to protect and mitigate damages to whistleblowers, complainants, or those who cooperate in reporting violations of ethical conduct, corruption, and malfeasance.

The company has measures in place to protect whistleblowers, reporters, and related parties, as detailed follow:



1. The company will fully protect complainants and informants, will not disclose any information that could identify the informant, and will keep all information confidential.

2. The company will prioritize the privacy and safety of informants, data sources, and related parties. Complainants, informants, data sources, and related parties have the right to receive appropriate and fair protection and mitigation processes.

3. Those receiving the complaint and those involved in the fact-finding process are obligated to maintain the confidentiality of the complaint details, including all related documents and evidence. Disclosure of this information to any unrelated party is strictly prohibited, except as required by law.

4. The company will not demote, punish, or impose any negative consequences for refusing to disclose corruption, even if such action results in the company losing business opportunities.

5. The Company considers all relevant information confidential and will only disclose it when necessary to the responsible parties to resolve the issue, taking into account the safety and potential harm to the reporter or related parties. If a complainant believes they may be unsafe or suffer harm, they may request the Company to implement appropriate protective measures. Alternatively, the Company may implement protective measures for the complainant without a request, provided it deems the matter likely to cause harm or insecurity. Those harmed will be provided with appropriate and fair remedies.

10. Communicating and disseminating policies within the organization and to external parties.

To ensure that everyone within the organization and external parties are aware of the anti-corruption policy, the company will take the following actions:

1. The company provides orientation and training on the anti-corruption policy to its directors, executives, and employees to ensure they are aware of and can implement it appropriately.

2. The company communicates and disseminates its anti-corruption policy, including channels for reporting information or complaints, and penalties under the anti-corruption policy, through various channels such as bulletin boards, email, intranet, and the company website. This ensures that all employees understand, accept, and comply with the anti-corruption policy.

3. The Company communicates and disseminates its anti-corruption policy, including channels for reporting irregularities or complaints, to the public, subsidiaries, business partners, related business representatives, and stakeholders through various channels such as the Company's website and annual reports, etc., in order to build understanding and encourage adherence to the Company's standards of social responsibility in combating corruption.

4. The company prepares documents to inform all customers, business partners, and business representatives about the company's policy and practices in combating all forms of corruption.

5. The company is committed to conducting business transparently in accordance with corporate governance principles and has established a policy to invite customers/partners and business representatives



to participate in the fight against corruption and to join a network of anti-corruption coalitions. This includes educating customers/partners/business representatives on conducting business transparently and with good corporate governance.

6. The company does not condone any illegal actions that violate this policy. Any director, executive, or employee who engages in such actions will be subject to severe disciplinary action.

7. The Company will provide a briefing on its anti-corruption and anti-bribery policy to directors, advisors, executives, and new employees.

11. Related Practices: Policies and guidelines for implementing the anti-corruption policy.

The company requires its directors, executives, and employees at all levels to exercise due diligence in dealing with forms of corruption as follows:

- 1) Do not engage in or participate in any form of corruption, whether directly or indirectly.
- 2) Ensure thorough communication among board members, executives, and employees, and that all processes strictly adhere to legal regulations. If errors occur in operations due to negligence or lack of knowledge, penalties should be imposed as prescribed by law.
- 3) The company's directors, executives, and employees will not engage in or support corruption under any circumstances, and will strictly adhere to anti-corruption measures.
- 4) The company's directors, executives, and employees are required to report any acts of corruption or fraud related to the company to their supervisors or responsible persons, and to cooperate in the process of fact finding.
- 5) The company will ensure fairness and protect whistleblowers who report corruption, as well as individuals who cooperate in reporting and in the investigation of corruption.
- 6) Individuals who engage in corruption will face disciplinary action in accordance with company regulations and may also be subject to legal penalties for their offenses.
- 7) The company's directors, executives, and employees are responsible for complying with the good governance and anti-corruption policies. The board of directors has instructed management to communicate and implement the anti-corruption measures.
- 8) Company directors, executives, and employees are prohibited from soliciting or accepting any property or other benefits for themselves or others that may induce them to perform or refrain from performing their duties, or that may cause the company to lose legitimate interests. This also includes prohibiting company directors, executives, and employees from giving or offering to give property or other benefits to outsiders to induce them to perform or refrain from performing any act that is illegal or improper in their official capacity, or in exchange for undeserved privileges as follow;
 - Giving and receiving bribes



Giving or receiving bribes in any form is prohibited. All of the above are for the purpose of receiving business benefits, and it is prohibited to authorize others to give or receive bribes on one's behalf.

- Business relationships and procurement with the government sector.

The company's operations and interactions with the government must be transparent, honest, and conducted in accordance with all applicable laws.

- Giving or receiving gifts; giving or receiving entertainment expenses and other benefits.

Entertainment/reception expenses and other benefits, including events (such as meals, entertainment, training, meetings, and related travel and accommodation) in which the caterer/payer participates with the recipient, will be considered a gift if the caterer/payer has participated in the event with the recipient. However, gifts, entertainment/reception expenses, and other benefits exceeding the specified rates must be approved in writing by the authorized approver as designated by the company. The giving or receiving of gifts/entertainment expenses, or other matters, must be appropriate and consistent with customs and practices, as well as applicable laws in each country where the company operates.

- Providing political assistance.

The company has no policy of assisting or supporting any political party, political group, or politician, whether directly or indirectly.

- Accepting donations; charitable donations. Public benefit and the giving or receiving of financial support.

The company stipulates that the acceptance of donations, charitable contributions, public benefit activities, and the giving or receiving of financial support must comply with the following requirements:

- (1) It must be transparent, legal, and ethical, and must not involve any actions that would harm society as a whole.
- (2) It must not be related to, or be used as an excuse for, bribery.
- (3) All charitable, public benefit, or sponsorship donations must be reviewed and approved according to company regulations.
- (4) In case of any doubts that may have legal implications, seek written legal advice. For other important matters, the decision of management will be made at its discretion.

12 Guidelines for Giving and Receiving Gifts and Providing Hospitality or Other Benefits.

The giving and receiving of gifts, souvenirs, and hospitality services, in accordance with local customs, traditions, or practices to express good relationships, is permissible within reasonable value and in compliance with applicable laws. The company does not support the giving or receiving of gifts, property, hospitality, or



any other benefits that lead to bribery, create incentives for dishonest decisions, or may negatively impact the company in any way. The company is committed to conducting business with honesty, transparency, fairness, and treating all stakeholders equally. Therefore, the company has established a No-Gift Policy regarding the giving and receiving of gifts, hospitality services, or other benefits as follows:

1. Directors, executives, and employees are required to report the receipt of gifts, presents, or other benefits if such receipt is in accordance with customary practice and the total value exceeds 3,000 baht per instance (value as announced by the National Anti-Corruption Commission). Report to your superiors in accordance with the established procedure. If, upon review, your superiors believe that the gift may influence decision-making or constitute an unfair incentive to perform duties, they may refuse to accept or return the gift, or return it to the company's central account.

2. Avoid giving or receiving gifts, hospitality services, or any other benefits to individuals or organizations that go beyond normal relationships or that exceed a value appropriate to local customs, traditions, and applicable laws. In cases of inappropriate acceptance or if the exact value is unknown, refuse acceptance or return the gift to the giver.

3. Directors, advisors, executives, and employees of the company, including their relatives and associates, are prohibited from soliciting or accepting gifts, property, entertainment, or any other benefits from customers, business partners, contractors, or anyone involved in the company's business operations, as this may create incentives or lead to unfair decision-making.

4. The giving of gifts, property, entertainment, or other benefits to external individuals or organizations must comply with the regulations of that organization, must not constitute bribery, and must not violate any laws. Furthermore, such giving must be approved within the limits specified in the operational guidelines, and verifiable evidence of expenses must be provided.

5. It is the responsibility of communicating and publicizing these practices to all relevant stakeholders, including customers, business partners, contractors, and those involved in the company's business operations, to ensure widespread awareness, and this must be done regularly.

The giving and receiving of gifts, hospitality services, or other benefits are subject to strict and transparent control procedures. Gifts or benefits given to business partners or other involved parties should be treated uniformly to prevent discrimination. Their value should not exceed 3,000 baht. If a gift or benefit exceeds 3,000 baht, a clear approval request must be submitted, specifying the details of the gift or benefit, the recipient's name, and its value. This request should be submitted to the authorized approver, who should review the request considering the purpose, occasion, and appropriate value. The applicant must then provide proof of the gift or benefit to the finance and accounting department, including receipts.

13. Entertainment



Regarding entertainment and expense reimbursement, the company provides the following guidelines for directors, executives, employees, and related parties within the group:

1. Accepting entertainment or hospitality from clients, business representatives, or partners is prohibited if it violates any laws, regulations, and/or company policies, constitutes bribery, or violates the regulations of regulatory organizations governing the Company such as the Stock Exchange of Thailand and the Securities and Exchange Commission.

2. Directors and staff are prohibited from entertaining government officials and/or related persons, even if it is a private entertainment, unless the entertainment does not violate the law and is in accordance with normal customs and traditions.

3. Entertainment should ideally take place after business transactions. If they occur before, they should only be used to promote the company's products. Avoid implying that the reception is held in exchange for business purposes.

The process of providing hospitality involves strict and transparent control measures. Applicants must submit a clear request specifying details, purpose, and the organization providing the hospitality, along with supporting documents. Approving authorities should review the request, considering the purpose and appropriateness of the occasion before granting approval, in accordance with the company's approval authority schedule. The applicant must also submit a report of the hospitality event to the finance and accounting department, including supporting documents such as receipts, for verification purposes.

14 Guidelines for Charitable Donations and Sponsorships.

To ensure that charitable donations are transparent and aimed at the benefit of the community, and are not motivated by the expectation of personal gain or any other benefit that could be considered corruption, the company has established the following guidelines for charitable donations and sponsorships:

1. The assessment of the appropriateness of charitable donations and grants must follow guidelines to ensure transparency in the disbursement of funds, preventing any expectation of personal gain or other benefits in return that could be considered fraudulent or corrupt. These guidelines are as follows:

1.1 Charitable donations must have the objective of promoting a positive image for the company and generating public benefit, demonstrating the company's responsibility to society as a whole. They must not be made with the expectation of personal gain, which could be considered fraud or corruption.

1.2 Charitable donations must have the objective of benefiting the company's operations, and increasing the company's recognition and acceptance within the communities surrounding the areas where the company operates.

1.3 Charitable donations must have the objective of strengthening good relationships with the company's stakeholders and building long-term trust and credibility with the company.



1.4 Funding must be provided to support the successful achievement of project objectives, as well as to benefit the business, positive image, and reputation of the company, and not with the expectation of personal gain that could be considered fraud and corruption.

1.5 Charitable donations and sponsorships must be made in the name of the company only. Charitable donations and sponsorships must be verifiable as being for the stated purposes and can be audited.

2. Charitable donations and financial support must follow the procedures and guidelines below:

Organizations wishing to make charitable donations or provide financial support must notify their supervisor of their intention for approval. The supervisor must review the approval request to ensure that the purpose of the donation and support aligns with company guidelines.

Organizations wishing to make charitable donations or provide financial support are required to submit proof of donation or support, such as a letter of appreciation from the recipient organization, photographs of the donation or support, etc., to the accounting department as evidence of the charitable donation or support after the donation or support has been processed.

3. The Finance and Accounting Department shall review evidence of charitable donations or financial support and file the information. If the evidence is insufficient, they shall notify the organization of the donation or support to request further information or clarification.

4. If it is proven that charitable donations or sponsorships are not in accordance with company guidelines or are used as an excuse or pathway for corruption, it will be considered a serious disciplinary offense. The Internal Audit Department will review the charitable donation and sponsorship processes annually to ensure that these processes are efficient, effective, and have appropriate internal controls in place.

Charitable donations and grants are subject to strict and transparent control procedures and measures. Documentation is required for approval, specifying project details, objectives, and methodology. Applicants should ensure the project is genuine and verifiable. Approval from management, according to the approval authority schedule, is required before any action is taken. The applicant gathers supporting documents such as thank-you letters and receipts and submits a report to the finance and accounting department for auditing and approval.

15. Political assistance.

The company has a policy prohibiting the payment of money, assets, or other benefits to support or assist in political activities. The company has no policy or practice to provide political assistance, whether directly or indirectly, to any political party, politician, or politically involved individual, in order to obtain special privileges, undue benefits, or unfair business advantages.

This excludes employees' participation in political activities under the fundamental rights and freedoms. Directors, executives, and employees of the company and its subsidiaries have the right to freedom of expression under the Constitution and relevant laws to participate in politics, such as exercising their right to



vote in elections and referendums, etc. However, directors, executives, and employees of the company must not use company assets, resources, or time in the performance of their duties, provide services on behalf of the company or its subsidiaries, or claim the name of the company or its subsidiaries to support political activities, or engage in any actions that may lead to the understanding that the company or its subsidiaries are involved in or support political activities.

16 Guidelines for Managing Conflicts of Interest

The group of companies has subsidiaries engaged in similar businesses, which could lead to business conflicts. Therefore, the group has clearly separated its lending business among its subsidiaries. Policies, measures, criteria, and operational manuals have been established for this separation of lending businesses to ensure that employees can operate correctly. Furthermore, technology is used to assist in the lending process, thereby reducing the risk of conflicts of interest.

The Group has an operational control policy in place to ensure that the guidelines set by management are met and followed by all employees within the Group. This includes appropriately defined authority and approval levels, a segregation of duties to prevent fraud, and established procedures and methods for conducting transactions with major shareholders, directors, executives, or related parties to prevent conflicts of interest, in accordance with the requirements of the Securities and Exchange Commission as follow:

1. The Company's Board of Directors has established a conflict of interest policy based on the principle that any decision in conducting business activities must be made solely in the best interests of the Company and that actions that create conflicts of interest should be avoided. In considering various transactions, it is stipulated that persons involved in or related to the transaction under consideration shall not participate in the deliberation and shall not have the authority to approve such transaction. The Board of Directors will oversee compliance with all requirements regarding procedures and disclosure of information concerning transactions that may involve conflicts of interest.
2. The company's board of directors oversees conflicts of interest among directors and executives, including the misuse of company assets, and carefully considers and resolves these conflicts of interest with honesty, integrity, reason, and independence within the framework of good ethical conduct.
3. The Audit Committee shall review and approve related party transactions and/or the acquisition or disposal of assets of the Company or its subsidiaries, including reviewing and disclosing Company information in cases of related party transactions or transactions that may involve conflicts of interest, ensuring accuracy and completeness, and reviewing and approving such transactions for presentation to the Board of Directors and/or the shareholders' meeting of the Company. This is to ensure compliance with applicable laws and to ensure that such transactions are reasonable and in the best interest of the Company.



4. The Company requires its directors and executives to report annually on their positions as directors or partners in businesses outside of the Company's operations. This reporting includes spouses, minor children, and businesses where the director or executive and their spouses have controlling power, in order to prevent potential conflicts of interest.
5. The Company's Board of Directors has established measures and procedures for approving related party transactions, stipulating that executives or stakeholders cannot participate in the approval process. In cases where there are related party transactions between the Company or its subsidiaries and individuals who may have a conflict of interest, or who may have a potential future conflict of interest, the Company will have the Audit Committee provide an opinion on the necessity of the transaction, its reasonableness, and the appropriateness of the price. This opinion will consider various conditions in accordance with normal market operations and will involve comparing prices with those offered by external parties. If the Audit Committee lacks expertise in assessing potential related party transactions, the Company will arrange for a qualified professional, such as an independent auditor, appraiser, or law firm, independent of the Company and any potential conflict of interest, to provide an opinion on the transaction. The opinion of this qualified professional will be used to inform the decision-making of the Audit Committee, and/or the Company's Board of Directors, and/or shareholders, as applicable. The Company will disclose related party transactions in the notes to the financial statements that have been audited by the Company's auditors.
6. Directors, executives, and employees should avoid engaging in personal-related transactions that may create a conflict of interest with the Company. Their duties and positions must not conflict with the Company's interests. Decisions regarding the Company's business operations must be made in the best interests of the Company.
7. In the event that a director, executive, employee, or family member becomes involved in or holds shares in a business that competes with the Company's business or any business that may create a conflict of interest with the Company, they must notify the Board of Directors in writing.
8. All employees at every level of the company must avoid any financial involvement and/or relationships with any external party that would result in a loss of benefit for the company, create a conflict of interest, or hinder efficient operation.
9. During and after employment with the Company, directors, executives, and employees shall not disclose any information considered confidential of the Company for the benefit of anyone, whether it be electronic data, financial data, operational data, business data, future plans of the Company, or any other information.
10. In considering transactions that have or may have conflicts of interest between shareholders, directors, executives, and other persons that may have other conflicts of interest, a clear guideline is



applied, and it is believed that entering into such transactions is fair, transparent, reasonable, and that information is disclosed accurately and completely.

17 Guidelines on Facilitating Services

The company has a policy prohibiting the payment of facilitation fees to government officials under any circumstances. This is because the payment of such fees to government officials carries a very high risk of being considered bribery or illegal expense.

1. Company employees are prohibited from giving, requesting, or promising to give any facilitation fee or bribe, in the form of property or any other benefit, to a government official in order to induce them to act, refrain from acting, or delay acting in a way that affects the company's operations.

2. All interactions with the government must be transparent, honest, and strictly adhere to all applicable laws.

3. Directors, executives, and employees must not pay or accept any facilitation fees, from either the public or private sectors, in exchange for facilitating their work. This includes not accepting facilitation fees to expedite internal company processes that benefit external parties or clients.

18. Employment of government employees.

The company has no policy of employing government officials/employees currently holding positions in government agencies to work in roles that may create conflicts of interest or be in exchange for business benefits, which could pose a risk of corruption. This is because the company and its subsidiaries prioritize comprehensive corruption risk prevention. Any business operations or transactions conducted by the company and its subsidiaries must not involve the employment of government personnel. Therefore, the company and its subsidiaries do not hire any government officials or agencies to perform any duties.

1. The company has established a cooling-off period for former government officials or employees. They must resign from their government positions or fulfill a specific legally mandated period before applying for and being hired as an employee.

2. The company has a process for verifying the background of applicants to ensure they are not government officials or employees. This is a key condition in the recruitment process, particularly for management positions, in order to identify potential conflicts of interest.

3. The Company and its subsidiaries have a background check process in place for individuals to be nominated for appointment as directors, advisors, and executives of the Company and its subsidiaries, in order to identify potential conflicts of interest prior to appointment.



4. The company mandates disclosure of its non-employment of government employees in its annual report and sustainability performance report to ensure transparency and confidence that the company has clear operational measures in place.

19 Guidelines for Procurement/Purchasing

Procurement processes must be conducted in accordance with the criteria or procedures established by the company in its procurement policy and regulations. They must also be consistent with the approval and operational authority, ensuring fairness to all stakeholders in the decision-making process. Consideration must be given to the reasonableness of price, quality, and service received, as well as compliance with relevant standards for the goods or services, such as environmental standards and industry standards.

Furthermore, the procurement process must be transparent, honest, and in accordance with the company's procurement policies and regulations, as well as all relevant laws and regulations governing both public and private sector procurement.

20 Practices of Inside Information Usage for Personal Benefit

The company has established guidelines for the protection and prevention of insider trading. Directors, executives, employees at the level of department director and above, and individuals with inside information are prohibited from trading the company's securities within one month prior to the disclosure of quarterly and annual financial statements, and for 24 hours after the disclosure of material information. Furthermore, directors, executives, and senior management positions in accounting or finance at the level of department manager or equivalent are required to report any purchase or sale of the company's securities to the Securities and Exchange Commission (SEC) within three business days of each transaction, as stipulated by the Securities and Exchange Act, and to notify the company secretary of any changes in securities holdings.

21 Practices in the storage, access, recording, auditing, and data retention procedures of accounting records.

The company has auditing and data retention processes in place to support effective policies and prevent all forms of fraud or corruption. These practices are as follows:

1. The company has a process for verifying accounting entries and obtaining appropriate approval before recording them in the accounting system. This involves reviewing various company policies, regulations, relevant laws, contracts, or agreements to ensure compliance with accounting standards and policies.

2. Operating expenses and capital expenses must be properly and completely supported by evidence and must be approved strictly within the company's defined approval and operational authority.

3. Financial reports must be prepared accurately, truthfully, and reliably, and must disclose all material information correctly and completely, including related party transactions and potential liabilities.



4. The company has adequate and secure controls in place for the storage of accounting documents for immediate auditing. Access to accounting information is controlled, and backup data files are securely stored.

22 Practices in Human Resource Management

The company manages its human resources to support its anti-corruption policy effectively and prevent all forms of corruption. This is achieved by integrating the anti-corruption policy into its human resource management processes, with the following measures:

1. The company has established human resource management processes encompassing recruitment and selection, promotion, training, performance evaluation, and compensation. Supervisors at all levels are required to communicate and ensure employees understand the anti-corruption policy, applying it effectively to and overseeing the business activities under their responsibility.

2. The company provides an orientation process for new employees to ensure they understand and are aware of the anti-corruption policy, company expectations, and penalties for non-compliance with this policy.

3. The company has established human resource management processes that ensure fairness and protect employees who deny or report corruption related to the company. Employees who deny corruption will not be demoted, punished, or given negative consequences. Although such actions may result in a loss of business opportunities for the company, the company provides secure whistleblower channels and protection for reporters when employees wish to report information or leads, as well as guidance on complying with anti-corruption policies and practices.

23 Practices in Sourcing and Selecting Business Partners and Agents

This policy covers directors, executives, employees at all levels of the company, as well as subsidiaries, associated companies, other companies under the company's control, and the company's business representatives, such as suppliers and all types of external contractors, with the following guidelines:

1. Company personnel are prohibited from engaging in any conduct that is, or may be interpreted as, corruption, whether directly or indirectly, in the form of giving, receiving, offering, or soliciting bribes, money, goods, or any other inappropriate benefits.

2. We do not support corruption in any business dealings with government agencies, private companies, or individuals, both domestically and internationally.

3. Establish adequate internal control systems and mechanisms for regularly monitoring, tracking, and evaluating corruption risks.

4. Training and education on anti-corruption must be provided continuously to personnel and stakeholders involved.



5. Directors and senior management have a responsibility to set a good example and consistently oversee compliance with policy. All employees and stakeholders have a responsibility to comply with this policy. If any act of corruption is observed or suspected, it must be reported immediately through the company's designated channels.

6. The procurement and selection of business partners and representatives must be conducted transparently, including background checks and a corruption risk assessment of partners and representatives prior to hiring. Partners and representatives must acknowledge and strictly adhere to the company's anti-corruption policy, communicated through designated channels such as email or training.

24 Extortion, fraud, theft, embezzlement, money laundering, and other similar acts.

Directors, executives, and employees of the Company and its subsidiaries are prohibited from engaging in extortion, fraud, deception, collusion, complicity, embezzlement, money laundering, cybercrime, and other similar acts, including the theft of Company assets for personal gain or benefit. The following guidelines apply:

1. Directors, executives, and employees are prohibited from engaging in or participating in extortion, fraud, theft, embezzlement, money laundering, or any other act that is corrupt or illegal.

2. The Company and its subsidiaries have established robust internal control systems, particularly in processes related to asset management, finance, and approval of various transactions.

25. Create a corporate culture that is honest and committed to fairness.

1. Provide internal training to employees to promote integrity in their duties and to ensure that the principles and ethics of good corporate governance are strictly adhered to throughout the organization.

2. Establish a human resource management process that reflects the company's commitment to anti-corruption measures, from selection and training to performance evaluation, compensation consideration, and promotion.

3. Establish disbursement and procurement regulations, defining expenditure limits, approval authority, transaction purpose, and recipients, requiring clear supporting documentation. Appropriate approval authority should be defined at each level.

4. Conduct internal audits to ensure that the internal control system helps the company achieve its goals, including reviewing the operations of all departments to ensure compliance with requirements and regulations, identifying deficiencies and weaknesses, and providing recommendations for improving the efficiency and effectiveness of operational systems in accordance with good corporate governance principles.

5. Cooperate with the government in requiring all relevant agencies that interact with the government to disclose their income and expenditure accounts to the National Anti-Corruption Commission ("NACC").")

6. Designate the company secretary, internal auditor, or any other person as appropriately assigned by the Audit Committee, as the person responsible for ensuring good corporate governance.



26. Ensuring compliance and reviewing compliance.

1. The Company designates it as the duty and responsibility of its directors, executives, and employees to be aware of, understand, and strictly adhere to the policies established herein.

2. The company does not condone any illegal actions that violate this policy. Any director, executive, or employee who engages in such actions will be subject to strict disciplinary action.

3. The company board has mandated that this policy be reviewed regularly.

This anti-corruption policy and guidelines were approved by the Board of Directors meeting No. 2/2025 on February 26, 2025, and are effective from that date onwards.

Mr. Sukon Kanjanahatkit

Chairman of the Board

Srisawad Corporation Public Company Limited