



Anti-Corruption Principle and Policy
Srisawad Capital 1969 Public Company Limited

Anti-Fraud and Anti-Corruption Policy and Practices

Srisawad Capital 1969 Public Company Limited and its subsidiaries are committed to conducting business with transparency, good governance, and adherence to the principles of good corporate governance. To demonstrate this commitment, the Company has established the “Anti-Fraud and Anti-Corruption Policy and Practices,” with the objective of emphasizing the importance of preventing and countering all forms of corruption.

The Company is determined to comply with laws concerning the prevention and suppression of fraud and corruption, including bribery of government officials—both domestically and international—as well as officers in the private sector. Moreover, the Company encourages and promotes all directors, executives, and employees at every level to possess strong awareness and responsibility in opposing any form of corruption.

This policy sets forth the core principles and standards for preventing and countering corruption of all kinds, as well as the operational guidelines consistent with relevant laws, regulations, and international standards. It aims to ensure that all members of the organization can perform their duties correctly, confidently, and in line with the Company’s ethical culture.

On behalf of the Board of Directors, I sincerely hope that everyone will strictly comply with this policy and join together in fostering an organizational culture built on honesty, transparency, and accountability.

If you have any questions or suggestions regarding the implementation of this policy, please do not hesitate to consult the Internal Control and Audit Department or other relevant departments, so that we can collectively strengthen our anti-corruption efforts in every aspect of the organization.

Thank you all for your full cooperation and dedication in adhering to this Anti-Fraud and Anti-Corruption Policy.

Mr. Pinit Puapan

Chairman of the Board

Srisawad Capital 1969 Public Company Limited

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Anti-Corruption Policy

Srisawad Capital 1969 Public Company Limited (“the Company”) conducts its business with a strong commitment to integrity, ethics, transparency, and accountability to all stakeholders. The Company strictly prohibits any misuse of authority, violation of laws, ethical principles, regulations, or internal policies.

To ensure that all operations align with the Company’s anti-corruption principles and defined standards, the Company has established this **Anti-Corruption Policy** to serve as practical guidance for all personnel as follows:

1. Definitions

“**Fraud**” means any act committed for unlawful or illegitimate personal or third-party benefit, including but not limited to embezzlement, falsification of accounts, and corruption.

“**Corruption**” means any act of offering, promising, requesting, demanding, giving, or receiving money, property, or any other benefit—directly or indirectly—from or to a government official or any person doing business with the Company, in order to influence them to act or refrain from acting, to obtain or maintain any improper business advantage or convenience, except where such action is permitted by law, regulation, local custom, or trade practice.

“**Bribery**” means the act of giving or offering money, property, or any other benefit to induce a person to act, omit, or perform contrary to their duties, thereby obtaining or maintaining improper business advantage or causing reputational harm to the Company.

“**Gifts, Hospitality, Entertainment, Travel, and Other Expenses**” refer to the provision of gifts, hospitality, entertainment, travel, or other related expenses that are lawful, appropriate, transparent, and customary (e.g., during New Year festivals), made in the Company’s name—not in an employee’s personal capacity—and without influencing business decisions.

“**Receiving Gifts, Property, Bribes, or Other Benefits**” refers to the acceptance of such items or benefits in the Company’s name, under lawful and customary circumstances, such as unavoidable occasions or to maintain positive business relations, provided it is done transparently and without influencing performance or decisions.

“**Facilitation Payment**” means a small payment made to government officials to expedite routine administrative actions that the payer is legally entitled to, and that do not involve discretion by the official concerned.

“**Hospitality and Entertainment**” refer to reasonable expenses incurred to build or maintain good business relationships or for social etiquette, such as accommodation, transportation, travel, meals, or beverages, provided such acts do not affect decision-making or create conflicts of interest.

“**Conflict of Interest**” means any situation in which personal interests—direct or indirect—of directors, executives, or employees interfere with the interests of the Company, affecting impartial decision-making. This

includes favoritism (nepotism), cronyism, contracting only with close associates, or hiring former government officials for undue advantage (“revolving door” situations).

“Charitable Donation” (Charity) refers to expenditures made without tangible return for charitable purposes.

“Public Benefit Donation” means spending for projects or activities that benefit communities, society, or the public, without tangible return to the Company.

“Political Contributions” refer to any financial or non-financial support made in the name of the Company to political parties, politicians, or candidates (from either government or opposition), including loans, in-kind support such as goods, services, advertising, promotional activities, or event tickets, except where such support complies with the law and promotes democratic processes.

“Sponsorships” refer to financial or in-kind support given or received for the purpose of promoting the Company’s business reputation or relationships. However, sponsorships must not be used as a disguise for bribery or to gain improper advantage (e.g., using charitable or sporting events to influence officials’ decisions regarding contracts, licenses, or regulatory exemptions).

“Extortion, Fraud, Coercion, Intimidation, Deception, Collusion, Conspiracy, Embezzlement, Money Laundering, and Similar Acts” refer to the misuse of authority or engagement in unlawful acts such as those listed, all of which are strictly prohibited by law and considered a serious breach of duty, trust, and the Company’s ethical standards.

“Business Agent” means any legal entity or individual, not employed by the Company, engaged or authorized to conduct transactions or interact with external parties on behalf of the Company.

“Business Partner” means any person or entity engaged in business with the Company—such as suppliers, brokers, or service providers—to support or promote Company operations.

“Employment of Government Officials” refers to situations where government personnel are employed by the Company, potentially causing conflicts of interest or corruption risks.

“Government Official” means any person defined as such under the Anti-Corruption Act, including officers, employees, or agents of:

- Ministries, departments, or government agencies (e.g., Customs Department, Immigration Bureau)
- International organizations (e.g., World Bank, IMF)
- Political parties, politicians, election candidates, or local administrators
- Regulatory agencies (e.g., Securities and Exchange Commission (SEC) of Thailand, Bank of Thailand, Stock Exchange of Thailand)
- State-owned enterprises or organizations owned or controlled by the state

“Related Persons” include spouses, children, parents, siblings, and close relatives of the Company’s directors, executives, and employees at all levels, as well as those of subsidiaries.

“The Company” means Srisawad Capital 1969 Public Company Limited.

“The Group” means Srisawad Capital 1969 Public Company Limited and its subsidiaries.

2. Anti-Corruption Policy

2.1 Directors, executives, and employees of the Company shall not demand, engage in, or accept any form of corruption—whether directly or indirectly—for the benefit of the organization, themselves, their families, friends, acquaintances, or any business interest. This policy applies to all business operations in every country and across all entities related to the Company.

All business dealings with government agencies, state enterprises, or private entities—domestically or internationally—must be conducted with transparency, fairness, and in full compliance with applicable laws and regulations, both of Thailand and of the countries where the Company conducts business.

2.2 The Company shall regularly review compliance with this Anti-Corruption Policy, as well as evaluate and revise its operational procedures to align with changes in business conditions, regulations, and laws. Any violation, act of support, assistance, or cooperation in corruption will be subject to disciplinary action in accordance with Company regulations and may also lead to legal penalties if such acts are unlawful.

3. Duties and Responsibilities

3.1 Board of Directors

The Board of Directors is responsible for defining and approving the Anti-Corruption Policy and overseeing good corporate governance. The Board shall ensure that effective systems are in place to support anti-corruption measures and to promote awareness and adoption throughout the organization as part of its corporate culture.

3.2 Audit Committee

The Audit Committee is responsible for reviewing the adequacy of internal controls, financial and accounting reporting systems, internal audits, and risk management processes. The Committee shall ensure compliance with this Anti-Corruption Policy, applicable laws, and international standards, ensuring efficiency, modernity, and robustness.

3.3 Risk Management Committee

The Risk Management Committee is responsible for assessing corruption-related risks in all business activities to ensure alignment with the Company’s Anti-Corruption Policy.

3.4 Chief Executive Officer and Management

The Chief Executive Officer and management shall establish, promote, and supervise systems ensuring that all employees and related parties comply with anti-corruption regulations and measures. They must also review the appropriateness of such systems in line with business and legal changes.

3.5 Internal Audit Department

The Internal Audit Department is responsible for reviewing and verifying that all operations are conducted in accordance with Company policies, procedures, and laws. It shall ensure the adequacy of internal control systems to mitigate corruption risks and report findings to the Audit Committee.

3.6 Directors, Executives, and Employees

All directors, executives, and employees must strictly comply with this Anti-Corruption Policy and shall not engage in any corrupt activities, whether directly or indirectly.

3.7 Subcommittee

The Subcommittee shall review and update this policy as necessary to reflect changes in business regulations and laws and propose revisions to the Board of Directors for approval. It shall also ensure effective implementation of anti-corruption measures.

3.8 Senior Management

Senior management, led by the Chief Executive Officer and Managing Director, is responsible for disseminating and communicating anti-corruption measures throughout the organization.

3.9 Subsidiaries, Affiliates, and Business Partners

All subsidiaries, affiliates, business partners, and agents under the Company's control must acknowledge and comply with this Anti-Corruption Policy.

4. Scope and Practices

The Company requires all directors, executives, and employees to exercise caution and integrity in avoiding all forms of corruption as follows:

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

4.2 Ensure that all operations and communications at all levels comply strictly with applicable laws. In cases of negligence or unintentional misconduct, penalties will be applied according to law.

4.3 Directors, executives, and employees shall not act in or support corruption under any circumstances and must strictly follow anti-corruption measures.

4.4 All personnel must report any suspected act of corruption related to the Company to their supervisor or the department responsible and fully cooperate in investigations.

4.5 The Company will ensure fairness and protection for whistleblowers and those cooperating in corruption-related investigations.

4.6 Anyone found to have engaged in corruption shall be subject to disciplinary action and possible legal prosecution.

4.7 Directors, executives, and employees must comply with the principles of good corporate governance and anti-corruption, as directed and implemented by management under the Board's supervision.

4.8 No director, executive, or employee shall demand, receive, give, or offer property or benefits to induce any person to act or refrain from acting improperly, unlawfully, or against the Company's legitimate interests.

This includes:

- **Bribery:** Prohibition of giving or receiving bribes of any kind, including through third parties.
- **Business and Government Relations:** All dealings must be transparent, honest, and lawful.
- **Gifts and Hospitality:** Must comply with Company policies and be appropriate, transparent, and lawful.
- **Political Contributions:** The Company shall not support any political party, group, or politician directly or indirectly.
- **Donations and Sponsorships:**
 1. Must be transparent, lawful, and ethical, without adverse social impact.
 2. Must not be used as a disguise for bribery.
 3. Must follow Company review and approval procedures.
 4. When in doubt, seek written legal advice or management approval.

4.9 Promote a corporate culture of honesty, integrity, and fairness.

4.10 Provide employee training to foster awareness of integrity and compliance with the principles of good governance and ethics.

4.11 Integrate anti-corruption principles into HR management—recruitment, training, evaluation, compensation, and promotion.

4.12 Establish clear financial and procurement regulations, approval authority limits, documentation requirements, and proper authorization levels.

4.13 Conduct regular internal audits to ensure that internal control systems are effective, identify deficiencies, and recommend improvements consistent with good corporate governance practices.

4.14 Cooperate with the government to disclose financial transaction reports to the National Anti-Corruption Commission (NACC).

4.15 Assign the Company Secretary, Internal Auditor, or other designated person to oversee good corporate governance practices.

5. Failure to comply with the Anti-Fraud and Anti-Corruption Policy

5.1 Any director, executive, or employee violating this policy shall face disciplinary action, including dismissal, and may be subject to legal penalties under applicable laws, regulations, or governance standards.

5.2 If related parties, customers, business partners, or agents fail to comply with the anti-corruption measures, the Company reserves the right to terminate the business relationship or transaction.

6. Whistleblowing and Complaint Channels

The Company provides accessible channels for employees and stakeholders to report, complain, or express opinions concerning suspected corruption or misconduct. Reports will be handled confidentially and used to improve personnel management and overall governance.

7. Protection and Confidentiality Measures

The Company ensures fairness and protection for whistleblowers and information providers who act in good faith. A dedicated committee will investigate all reports, keeping all related information, documents, and evidence strictly confidential.

8. Review, Audit, and Improvement

The Company shall review, audit, and update this Anti-Corruption Policy and related policies annually or immediately upon any material change in regulations or business circumstances.

This Anti-Corruption Policy was approved by the Board of Directors' Meeting No. 4/2025 on August 14, 2025.

Mr. Pinit Puapan
Chairman of the Board
Srisawad Capital 1969 Public Company Limited

Guidelines for Anti-Fraud and Anti-Corruption Practices

1. Introduction

Srisawad Capital 1969 Public Company Limited is firmly committed to conducting its business transparently and lawfully, with a strong pledge that the Company will not support any form of corruption. The Company upholds the principles of good corporate governance and is dedicated to ensuring that its directors, executives, and employees strictly comply with all applicable laws.

Furthermore, the Company promotes lawful, transparent, and corruption-free business conduct among its partners and stakeholders. The purpose is to prevent corruption in every business activity and to ensure that decisions and operations involving potential corruption risks are undertaken with prudence and accountability.

2. Objectives

This Anti-Fraud and Anti-Corruption Policy and its Guidelines are disseminated both internally and via the Company's website, with the following objectives:

1. To promote and encourage directors, executives, and employees to actively participate in the prevention and suppression of all forms of corruption, whether direct or indirect, and to foster awareness that leads to a strong anti-corruption organizational culture.
2. To express the Company's and its subsidiaries' clear intent and commitment to counter all forms of fraud and corruption through well-defined responsibilities, guidelines, and appropriate procedures for every business activity.
3. To build trust among stakeholders by ensuring that all business operations are conducted with integrity and honesty.
4. To serve as a clear operational guideline that supports ethical business practices and sustainable organizational development.

3. Scope

This policy applies to all directors, executives, and employees at every level of Srisawad Capital 1969 Public Company Limited and its subsidiaries, without exception or discrimination.

The Company also expects all customers, business partners, agents, and related third parties to strictly adhere to and uphold this Anti-Corruption Policy in all interactions with the Company.

4. Non-Tolerance Toward Corruption

The Company will not ignore or overlook any act that may constitute corruption, even if such an act could seemingly benefit the Company.

To ensure that all personnel act responsibly and transparently, every employee must thoroughly understand and comply with the **Anti-Corruption Policy, Corporate Governance Policy, Code of Conduct, Anti-Corruption Guidelines, Operational Manuals**, and other related internal policies—without exception.

The Company commits to investigating all suspected cases of corruption carefully, objectively, and fairly, regardless of the accused person's position, length of service, or relationships within the Company. Investigations shall be conducted impartially and without bias, in accordance with the Company's official procedures regarding fraud or illegal acts.

Those found guilty will be subject to the highest level of disciplinary action. Furthermore, any employee who becomes aware of corruption but fails to report it will also be subject to disciplinary measures.

The Company guarantees **protection and fairness** for whistleblowers and employees who refuse to participate in corrupt acts or who report corruption in good faith. The Company will not demote, punish, or otherwise retaliate against any employee who rejects corruption, even if such refusal results in the Company losing a business opportunity.

5. Roles, Duties, and Responsibilities

To ensure that the Company's anti-corruption measures are implemented effectively and with clarity, the following roles and responsibilities are established:

5.1 Board of Directors

The Board of Directors shall:

1. Define and approve the Company's Anti-Corruption Policy.
2. Approve and review anti-corruption implementation guidelines.
3. Oversee the establishment of effective systems that support anti-corruption measures.

5.2 Audit Committee

The Audit Committee shall:

1. Ensure that the Company maintains adequate internal control systems.
2. Review the effectiveness of the Company's compliance with the Anti-Corruption Policy.

5.3 Chairman, Chief Executive Officer, and Managing Director

The Chairman, CEO, and Managing Director shall:

1. Promote, support, and supervise all employees and related parties to ensure compliance with the Company's Anti-Corruption Policy, related measures, and operating procedures, and communicate these effectively throughout the organization.
2. Regularly review and improve internal systems and measures to align with changes in business operations, regulations, and legal requirements.

5.4 Directors and Senior Executives

Executives at the Director level and above shall:

1. Implement and monitor anti-corruption measures effectively, identify risks, and ensure adequate and timely risk management and remediation.
2. Support process improvement and personnel development to ensure the success of the Company's anti-corruption initiatives.

5.5 Employees

Employees shall:

1. Understand and comply with all anti-corruption measures and participate in required training sessions organized by the Company.
2. Promptly report any observed or suspected acts of corruption and cooperate fully in related investigations.
3. Refrain from engaging in any act of corruption, directly or indirectly, and strictly comply with Company procedures—particularly those involving high-risk functions such as procurement, credit approval, recruitment, and finance.

5.6 Internal Control and Audit Department

The Internal Control and Audit Department shall:

1. Review and verify that operations comply with policies, measures, and laws, ensuring adequate internal controls to mitigate corruption risks, and report findings to the Audit Committee.
2. Develop tools for assessing corruption risk and coordinate risk assessments across departments.
3. Summarize and present organization-level corruption risk assessments to the Risk Management Committee.
4. Collect and review annual updates of corruption risk control measures across departments.

5.7 Human Resources Department

The Human Resources Department shall:

1. Manage human resources in alignment with the Company's anti-corruption measures.
2. Establish procedures for recruitment, orientation, training, and disciplinary actions relating to anti-corruption compliance.
3. Promote an organizational culture of anti-corruption awareness and avoidance of unethical practices.
4. Communicate and disseminate the Company's Anti-Corruption Policy, measures, and related activities to foster integrity among all employees.

5.8 Finance and Accounting Department

The Finance and Accounting Department shall:

1. Record and securely maintain accounting, tax, and financial transaction documents.
2. Conduct financial and accounting operations in compliance with generally accepted accounting standards.
3. Ensure that all expense reimbursements and disbursements comply with internal regulations, approval procedures, and anti-corruption measures.

5.9 Procurement Department

The Procurement Department shall:

1. Verify the background of business partners and agents, particularly suppliers, contractors, and service providers, to assess credibility, financial status, reputation, and compliance with human rights principles. Ensure that business partners are free from child labor, forced labor, money laundering, or any illegal activity, in accordance with the Company's Anti-Money Laundering and Counter-Terrorism Financing Policy. This ensures transparency and compliance with the Company's Supplier Code of Conduct.
2. Communicate anti-corruption policies, practices, and related procedures to all business partners and relevant stakeholders.
3. Strictly comply with the Company's Anti-Corruption Policy and related guidelines in all procurement activities.

5.10 Risk Management Department

The Risk Management Department shall:

1. Assess and analyze corruption risks across all business units, identifying potential risks, evaluating severity and likelihood, and developing corruption risk management plans with preventive and mitigating measures.
2. Implement enterprise-wide risk management frameworks, monitor and evaluate risk management performance, and regularly review risk measures to ensure effectiveness in preventing and resolving corruption incidents.

It is the responsibility of ****all personnel**—at every level, from employees to executives and the Board of Directors—to understand and comply with the Company's Anti-Corruption Policy, guidelines, and related regulations without exception.

Any violation or non-compliance may result in disciplinary action under Company rules.

6. Preventive Measures Against Fraud and Corruption

The assessment of corruption risks, the formulation of related anti-corruption policies, the design and implementation of appropriate internal controls, and the promotion of ethical awareness among personnel are key elements in preventing corruption within the organization.

6.1 Corruption Risk Assessment

The purpose of corruption risk assessment is to ensure that all departments take proactive action to identify, evaluate, and review the organization's corruption risks. This process increases awareness of potential risks and their impact on the Company's objectives and operations, ensuring that all risks are properly managed in a timely manner.

Each business unit's management must cooperate by providing accurate information about possible corruption risks within their responsibility.

The assessment process comprises **three main stages**:

1. **Preparation:** Establish criteria for assessing both the *impact* and *likelihood of occurrence* of corruption risks and determine the Company's acceptable risk level (*risk appetite*).
2. **Identification and Evaluation:** Identify risks, existing internal controls, and analyze the effectiveness of these controls by evaluating the severity and likelihood of residual risks after controls are applied.
3. **Risk Mitigation:** Develop additional control measures where existing controls are insufficient to reduce risks to an acceptable level.

The **Risk Management Department** shall act as an advisor to management, consolidate results from all business units, and prepare the Company's overall corruption risk documentation. Each risk-owning department must report quarterly on its risk-management performance to the Risk Management Department, which in turn submits consolidated reports to the Executive Committee and Board of Directors.

While the Risk Management Department provides consultation and gathers data, the **primary responsibility** for identifying, assessing, and mitigating risks rests with management in each business unit.

The **Internal Audit Office** shall evaluate the adequacy and effectiveness of internal controls identified during risk assessment. If controls are found insufficient, the Audit Office will provide recommendations for improvement to ensure risks remain within acceptable limits.

The Company conducts annual reviews of corruption risk to detect new or changing risk levels resulting from factors such as process changes, adoption of new IT systems, changes in employee roles, or the emergence of new fraud schemes.

6.2 Formulation of Anti-Corruption-Related Policies

The Company establishes and maintains comprehensive policies, standards, and operational guidelines—including the **Corporate Governance Policy, Anti-Corruption Policy, Guidelines for Anti-Corruption Practices, Charitable Donation Guidelines, Sponsorship Guidelines**, and rules governing gifts, entertainment, and business ethics. These documents serve to enhance employees' understanding of good governance principles, ethical conduct, and responsible business practices while fostering awareness, conscience, and values that promote a strong anti-corruption culture.

6.3 Communication and Training

Communication and training are essential components of the Company's preventive framework, ensuring understanding and commitment to compliance with anti-corruption policies and related procedures. They promote employee participation in risk management and strengthen the Company's overall vigilance against corruption. The Company also communicates its anti-corruption commitments to business partners, stakeholders, and the public to demonstrate transparency and ethical conduct.

Communication Plan and Implementation:

1. Prepare an **annual written communication plan** covering both internal and external communication.
2. Use appropriate communication channels such as internal newsletters, bulletin boards, advertisements, leaflets, and training sessions.
3. Define the **frequency** of communication activities for each channel.
4. Ensure communication content covers anti-corruption measures, related policies, expectations, whistleblower protection, and disciplinary actions for non-compliance.
5. Execute the approved annual communication plan.

The **Internal Audit Office** shall review and evaluate the effectiveness of communication channels as part of internal control assessment. The **Human Resources Department** is responsible for communicating and organizing training related to anti-corruption for:

- **Board of Directors:** All board members shall be informed of the Company's Anti-Corruption Policy, and newly appointed directors shall receive orientation on the subject.
- **Employees:**
 - *New employees* receive anti-corruption orientation during onboarding to ensure proper understanding of ethical conduct.
 - *Existing employees* receive annual refresher training to reinforce understanding of corruption risks, reporting procedures, and ethical responsibilities.

- **Business Partners and Contractors:**

The Company communicates its Anti-Corruption Policy to all partners, distributors, service providers, and contractors at the beginning of each relationship and periodically thereafter, encouraging adherence to anti-corruption principles.

6.4 Background Checks for Personnel and Business Partners

Background checks are vital to the prevention of corruption. The **Human Resources Department** is responsible for verifying employee backgrounds prior to hiring, evaluating performance, determining compensation, and promotions. The **Procurement Department** verifies the background of all parties entering into business

relationships with the Company prior to contract execution. Background checks shall be conducted appropriately, in compliance with applicable laws, and with the consent of the individuals or entities concerned.

1. **Pre-employment Screening:** Verify applicants' qualifications, experience, and any history of fraudulent behavior.
2. **Screening Before Appointment to Key Positions:** Assess candidates' integrity, financial reliability, references, and potential conflicts of interest prior to promotion or reassignment.
3. **Business Partner Screening:** Verify suppliers, contractors, and service providers for credibility, financial status, reputation, and business conditions. Ensure they comply with international human rights standards, do not use child 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 Policy and Supplier Code of Conduct**.

Additionally, directors and executives (as defined by the Capital Market Supervisory Board) must annually disclose any conflicts of interest to the Company Secretary and promptly update the disclosure upon changes.

6.5 Internal Control

Internal control is a process jointly established by the Board of Directors, management, and all employees to ensure reasonable assurance that the Company's objectives will be achieved. It serves as a primary tool for preventing corruption in all operations.

Each department head must design adequate controls for processes under their responsibility, consistent with the results of corruption risk assessments, and ensure that employees understand and comply with them.

The Company maintains **documented standard operating procedures (SOPs)** that clearly segregate duties, define responsibilities, and support transparent and auditable operations. These documents must be approved by management, communicated to relevant staff, and accessible at all times.

Each department shall periodically review its procedures, especially following material operational changes, to ensure ongoing alignment with sound internal control principles.

The **Internal Control and Audit Department** evaluate the adequacy, appropriateness, efficiency, and effectiveness of the control system and provides recommendations for improvement. Audit findings are discussed with the relevant department heads to ensure understanding and implementation of corrective measures. Results are reported to the **Audit Committee** quarterly. Department heads are responsible for following up on recommended improvements.

When new anti-corruption measures are introduced, the Internal Control and Audit Department shall assess the design and effectiveness of related internal controls and report results to the Audit Committee.

6.6 Business Ethics and Anti-Corruption

The Company upholds **business ethics** as a foundation for anti-corruption. Ethical principles are integrated into all operations and HR practices, including employee recognition, disciplinary actions, career advancement, and performance evaluation.

The Company also ensures protection for employees who adhere to ethical standards and refuse to engage in corruption. Such employees will not face demotion, penalties, or retaliation—even if their actions result in lost business opportunities.

Violations of business ethics or related anti-corruption policies will result in disciplinary action ranging from warnings or score deductions to termination, in accordance with Company regulations, regardless of any potential benefit gained by the Company from the misconduct.

6.7 Enforcement of the Anti-Corruption Policy and Guidelines

1. This Policy and its Guidelines are binding on the Board of Directors, executives, and employees, effective from the date of Board approval.
2. Any amendment, revision, interpretation, or cancellation must be approved by the Board of Directors.
3. This Policy extends to business agents, partners, and all persons acting on behalf of the Company or its subsidiaries. Violation of this Policy will result in termination of the contract or business relationship.

6.8 Recordkeeping and Data Retention

All records and data essential to the Company's operations must be accurate, complete, transparent, and auditable. The Company maintains an effective internal control and audit system, supervised by the Audit Committee. Data recording and retention shall comply with the **Company's Communication and Disclosure Policy**, related regulations, and other applicable policies.

7. Procedures Upon Receiving Whistleblowing Reports and Complaints

A well-structured whistleblowing and complaint-handling process can significantly reduce the likelihood of corruption. The Company has therefore established **fraud detection mechanisms** to ensure prompt identification and reporting of any suspected misconduct. These mechanisms comprise two main activities (1) **Whistleblowing Channels** and (2) **Fact-Finding Investigations** — which are designed to detect, investigate, and prevent corruption effectively. To ensure efficiency, the **Internal Control and Audit Department** shall review and evaluate the adequacy and effectiveness of these mechanisms annually.

7.1 Whistleblowing Channels

The Company provides **reliable and independent channels** for reporting suspected corruption, allowing both employees and external parties to report any concerns promptly. Protection measures are in place to ensure whistleblowers are safeguarded from retaliation, harassment, or intimidation, thereby encouraging employees to report wrongdoing without fear.

Any employee who is aware of possible corruption but fails to report it will be subject to disciplinary action. Conversely, those who report in good faith will be protected and may be eligible for compensation if any loss occurs as a result of the report. However, individuals who intentionally submit false or malicious reports will face disciplinary measures.

Anonymous reports must contain sufficient factual details, including:

- Description of the incident
- Name(s) of the suspected person(s)
- Date and time of occurrence
- Location of the incident
- Circumstances and environment of occurrence
- Frequency or recurrence of the event

Whistleblowers and complainants may report through the following official channels:

1. Directly to the **Chairman of the Board, Chief Executive Officer, or Managing Director**
2. Directly to the **Chairman of the Audit Committee, via the Audit Committee Secretary**
3. Directly to their **supervisor**
4. Directly to the **Chairman of the Audit Committee**, in cases involving senior executives or directors
5. By letter addressed to one of the following:
 - Chairman of the Audit Committee
 - Chairman of the Corporate Governance and Sustainability Committee
 - Company Secretary
 - Head of Internal Audit Office
 - Head of Human Resources Department

Contact Information:

 **Postal Mail:** Srisawad Capital 1969 Public Company Limited

99/392 Srisawad Building, Floors 1, 5, and 6 Soi Chaeng Wattana 10, Intersection 3
(Benjamit), Chaeng Wattana Road, Thung Song Hong, Lak Si District, Bangkok 10210

 **Email:** AC@srisawadcapital.co.th

 **Website:** <https://investor.srisawadcapital.co.th/th/corporate-overnance/whistleblowing-channel>

 **SCAP's Contact Center:** 02-691-5600

7.2 Fact-Finding Investigation

When a report or suspicion of corruption is received, or an incident is detected, the **Internal Audit Office** and/or **Human Resources Department** will conduct a **preliminary review**. If sufficient evidence exists, an **Investigation Committee** shall be appointed to carry out a formal inquiry in accordance with the Company's *Guidelines on*

Fraudulent or Illegal Conduct. If the Company lacks sufficient internal resources or deems it appropriate, **external experts** may be engaged to conduct or support the investigation. The Investigation Committee must act **fairly, confidentially, and objectively**, disclosing no information to unauthorized parties. Findings and recommendations must be reported to the **Board of Directors**. If obstacles arise that may materially affect the Company, the Committee must promptly escalate the matter to the Board for immediate resolution.

7.3 Disciplinary Actions and Corrective Measures

7.3.1 Disciplinary Actions

The Company is committed to fostering integrity, transparency, and zero tolerance toward corruption among directors, executives, and employees. All personnel are required to adhere to the Anti-Corruption Policy and related measures. Failure to comply constitutes a disciplinary offense under Company rules and may result in penalties, including termination. Ignorance of this policy cannot be used as a justification for non-compliance. If corruption results in a violation of the law, the Company reserves the right to pursue legal action against the offender.

7.3.2 Corrective Measures

Upon completion of the investigation, the Investigation Committee — in coordination with relevant executives — shall propose **corrective and preventive measures**, such as:

- Revising or updating Company policies
- Strengthening internal control systems
- Modifying operational procedures

Each corrective action must include a defined timeline and responsible parties, and progress must be reported to senior management for approval and implementation.

7.4 Reporting of Corruption Cases

The Investigation Committee must compile and summarize all findings, conclusions, and outcomes for submission to the **Audit Committee Secretary**, who will consolidate and report to the **Audit Committee** and **Board of Directors** on a quarterly basis. In urgent or severe cases requiring immediate action, reports must be made **without delay**. All reports and related data must be treated as **strictly confidential**, disclosed only to authorized persons.

Reporting Procedures:

1. Notify the whistleblower or complainant of the investigation outcome.
 - If the complainant's identity is known, they must be informed within **7 business days** after conclusion.
 - Anonymous complaints will be addressed based on the complexity of the case, with updates provided once findings are finalized.

2. Upon completion of the investigation, the Company will inform the whistleblower of the results.
3. The **Head of Internal Audit** or designated officer must communicate outcomes to the whistleblower (if requested).
4. The same officer must maintain confidential records of all complaints and compile whistleblowing statistics for submission to the Audit Committee and the Board.
5. The **superior of the accused** must prepare an improvement plan and preventive measures to avoid recurrence, and report progress to the Executive Committee and Audit Committee.

7.5 Data Management

1. The Company complies with applicable accounting and financial reporting standards and legal requirements.
2. All expenses must be properly documented, approved in accordance with delegated authority, and retained as required by law.
3. The Company strictly prohibits **false, misleading, incomplete, or manipulated records and off-book accounts** used to conceal or support improper payments.

8. Responsive Measures for Fraud and Corruption

8.1 Employee Responsibilities

Employees must not neglect or ignore any act that violates Company rules, orders, or policies, nor disregard any conduct that appears, or is suspected, to constitute corruption related to the Company. Any such observation or suspicion must be promptly reported to their **supervisor** or the responsible person. If employees have questions or uncertainty about such matters, they are encouraged to seek guidance from their supervisor.


8.2 Reporting Channels

Any individual who witnesses or suspects corruption—or who experiences adverse effects from opposing corruption—may report concerns or lodge complaints through any of the following official channels:


1. Directly to the **Chairman of the Board, Chief Executive Officer, or Managing Director**
2. Directly to the **Chairman of the Audit Committee, via the Audit Committee Secretary**
3. Directly to the **immediate supervisor**
4. Directly to the **Chairman of the Audit Committee**, in cases involving senior executives or directors
5. By post or email to one of the following:
 - **Chairman of the Audit Committee**
 - **Chairman of the Corporate Governance and Sustainability Committee**
 - **Company Secretary**
 - **Head of Internal Audit Office**

- Head of Human Resources Department


Contact Information:

 **Postal Mail:** Srisawad Capital 1969 Public Company Limited

99/392 Srisawad Building, Floors 1, 5, and 6 Soi Chaeng Wattana 10, Intersection 3
Benjamit), Chaeng Wattana Road, Thung Song Hong, Lak Si District, Bangkok 10210

 **Email:** AC@srisawadcapital.co.th

 **Website:** <https://investor.srisawadcapital.co.th/th/corporate-overnance/whistleblowing-channel>

 **SCAP's Contact Center:** 02-691-5600

8.3 Cooperation in Investigations

Employees are required to **cooperate fully** with any investigation and provide factual information when incidents or suspicions of corruption arise.

8.4 Fair Treatment and Protection

The Company ensures fairness and protection for employees who report corruption in good faith or refuse to engage in any corrupt act, in accordance with its **Whistleblowing and Anti-Corruption Complaint Procedures**.

9. Protection and Remedies Measures for Whistleblowers, Complainants, and Cooperating Parties

The Company has established comprehensive protection measures for whistleblowers, complainants, and individuals who provide information or cooperate in investigations, as follows:

1. **Confidentiality Protection:** The Company will protect the identities of complainants and informants to the fullest possible. No identifying information will be disclosed, and all related records will be kept strictly confidential.
2. **Personal Safety and Fair Treatment:** The Company prioritizes the privacy and safety of whistleblowers, informants, sources, and related persons. They are entitled to fair and appropriate protection and remediation measures if they suffer harm as a result of their disclosure.
3. **Confidential Handling of Complaints:** All individuals involved in handling complaints or investigations are obligated to maintain confidentiality regarding all information, evidence, and documentation. Disclosure to unauthorized persons is strictly prohibited, except as required by law.
4. **Non-Retaliation Commitment:** The Company guarantees that no employee will face demotion, punishment, or any adverse treatment for refusing to participate in or report corruption—even if such refusal results in the loss of business opportunities.
5. **Limited Disclosure and Safety Assurance:** All reports and related information are treated as confidential and will only be disclosed to authorized persons responsible for corrective action. If the complainant believes they are at risk of harm or retaliation, they may request specific protection measures from the

Company. The Company may also proactively implement protection measures when it deems necessary to ensure safety and prevent potential harm. In cases where damage or distress occurs, the Company will provide **appropriate and fair remediation** through transparent and equitable procedures.

10. Communication and Dissemination of the Policy withing the organization and to External Parties

To ensure that all employees and external parties are fully aware of the Company's **Anti-Corruption Policy**, the Company shall undertake the following actions:

1. **Orientation and Training** The Company provides orientation and training sessions for directors, executives, and employees on the Anti-Corruption Policy to ensure their understanding and appropriate compliance.
2. **Internal Communication** The Company communicates and disseminates the Anti-Corruption Policy—including whistleblowing channels, complaint procedures, and disciplinary measures—to all internal personnel. Employees are required to acknowledge the policy through multiple communication channels, such as internal notice boards, email, intranet, and the Company's website. This is to ensure full understanding, acceptance, and adherence to the Anti-Corruption Policy by all employees.
3. **External Communication** The Company also communicates the Anti-Corruption Policy—including whistleblowing and complaint mechanisms—to the public, subsidiaries, business partners, agents, and other stakeholders through appropriate channels, such as the Company's website and annual reports. The purpose is to build mutual understanding and encourage commitment to the same **ethical and social responsibility standards** as upheld by the Company.
4. **Notification to Customers and Partners** The Company issues official documents to inform all customers, business partners, and agents of its **zero-tolerance stance** and operational guidelines against all forms of corruption.
5. **Promotion of Transparency and Collaboration** The Company is committed to conducting business with transparency in accordance with good corporate governance principles. It invites customers, business partners, and agents to **join anti-corruption initiatives** and become members of anti-corruption networks. The Company also provides knowledge and guidance to promote transparent and ethical business practices.
6. **Disciplinary Actions** The Company does not condone any illegal or unethical actions that violate this policy. Directors, executives, and employees who commit such acts shall be subject to **strict disciplinary action**.

7. **Policy Briefing for New Personnel** The Company ensures that all new directors, advisors, executives, and employees are informed of and clearly understand the Company's Anti-Corruption Policy.

11. Related Practices (Guidelines for Implementation)

The following operational guidelines support the implementation of the Company's Anti-Corruption Policy.

All directors, executives, and employees at every level must exercise due care and adhere to these principles:

1. **Zero Tolerance for Corruption** No employee shall engage or participate—directly or indirectly—in any form of corruption.
2. **Comprehensive Communication and Legal Compliance** The Company shall ensure that all levels—directors, executives, and employees—are informed and operate strictly within legal boundaries. In cases of negligence or unintentional errors, appropriate penalties under the law shall apply.
3. **Strict Adherence to Anti-Corruption Measures** All personnel must refrain from, and not support, any corrupt act and must comply with all anti-corruption procedures and policies.
4. **Reporting Obligation** All directors, executives, and employees are required to promptly report any conduct suspected to be corrupt to their **supervisors** or responsible officers and fully cooperate in investigations.
5. **Fairness and Protection** The Company ensures fairness and protection for all complainants and individuals who cooperate in corruption-related investigations.
6. **Disciplinary and Legal Penalties** Anyone found engaging in corruption will face **disciplinary action** according to Company regulations and may also be subject to **legal prosecution**.
7. **Governance Compliance** Directors, executives, and employees must comply with good corporate governance and anti-corruption policies. The Board of Directors delegates authority to management to communicate, enforce, and monitor compliance.
8. **Prohibition of Bribery and Improper Benefits** No director, executive, or employee shall solicit or accept assets or benefits for themselves or others that may improperly influence their duties or cause loss to the Company. Similarly, they must not offer or promise assets or benefits to others to induce illegal or unethical acts or gain improper advantages.

Specific Guidelines

• Bribery

Offering or accepting bribes in any form, whether directly or indirectly, is strictly prohibited. No person shall authorize or assign another party to give or receive bribes on their behalf.

• Government Relations and Procurement

All dealings with government agencies must be conducted **honestly, transparently, and in full compliance with applicable laws**.

- **Gifts, Hospitality, and Other Benefits**

Meals, entertainment, events, or travel provided as hospitality are considered **gifts** when the provider participates in the same event. Any gift, entertainment, or benefit exceeding the Company's approved value threshold must receive **written approval** from the authorized officer. All such acts must be **reasonable, customary, and lawful** in the relevant jurisdiction.

- **Political Contributions**

The Company has a **strict non-political-contribution policy**. It does not support, directly or indirectly, any political parties, groups, or politicians.

- **Donations, Sponsorships, and Charitable Contributions**

All donations and sponsorships must comply with the following principles:

1. Be **transparent, lawful, ethical**, and not harmful to society.
2. Must not be used as a **disguise for bribery**.
3. Must undergo appropriate **due diligence and approval** processes.
4. If there is any legal ambiguity or uncertainty, written consultation with the **Legal Department** is required.

For significant or sensitive matters, final discretion rests with **Management**.

12. Guidelines on Accepting/Receiving Gifts, Hospitality, or Other Benefits (No-Gift Policy)

Giving or receiving gifts, souvenirs, or hospitality in accordance with customary social or local traditions to express goodwill may be permitted **at an appropriate value and in compliance with applicable laws**. The Company **does not support** the giving or receiving of any gift, asset, entertainment, hospitality, or other benefit that could constitute a bribe, create improper inducement, or lead to an **unjust business decision** that may harm the Company. Committed to honesty, transparency, fairness, and equal treatment of stakeholders, the Company adopts the following **No-Gift Policy**:

1. **Disclosure of High-Value Gifts** Directors, executives, and employees must **report** any gift, present, or other benefit received in accordance with customary practice **if the combined value exceeds THB 3,000 per occasion** (per the NACC announcement). The report shall be submitted to the line supervisor. If, upon review, the supervisor considers the item may influence decisions or constitute improper inducement, the supervisor may **decline/return** the item or **submit it to the Company's central pool**.
2. **Avoid Improper Gifts/Hospitality** Avoid giving/receiving gifts, hospitality, or other benefits that go beyond normal relationship-building, **exceed customary/local norms**, or **breach applicable laws**. If the appropriateness or value is unclear, the recipient must **decline or return** the item to the giver.
3. **Prohibition on Solicitation** Directors, advisors, executives, employees, and their **relatives/close associates** must **not solicit** gifts, assets, entertainment, hospitality, or other benefits from customers,

partners, contractors, or any party doing business with the Company, as this may create improper inducement or lead to unfair decisions.

4. **Providing Gifts/Hospitality to External Parties** Any gift, asset, entertainment, hospitality, or other benefit provided to external persons/entities must **comply with the recipient's rules, not constitute a bribe**, and must comply with applicable laws. Written approval within delegated authority limits is required, and verifiable supporting documents must be retained.
5. **Communication to Stakeholders** This guidance shall be **communicated regularly** to relevant stakeholders, customers, partners, contractors, and other parties involved in Company business—to ensure broad awareness.

Control Measures and Thresholds

- Apply uniform standards to all partners/agencies to avoid discrimination.
- Value should not exceed THB 3,000.
- If any gift/benefit exceeds THB 3,000, a written approval request must be submitted specifying the item/benefit details, recipient's name, and value, for approval by an authorized person per the Company's delegation of authority.
- The requester must submit evidence of the gift/benefit (e.g., receipt) to Finance & Accounting for audit and recordkeeping.

13. Entertainment and Hosting Practices

Directors, executives, employees, and relevant persons within the Group may engage in entertainment/hosting in accordance with the following guidelines:

1. **No Improper Entertainment** Do not accept entertainment from customers, agents, or partners where it violates laws, contravenes Company rules/policies, amounts to bribery, or violates rules of supervisory bodies (e.g., SET and SEC Thailand).
2. **Government Officials** Directors and personnel must not provide entertainment to government officials and/or related persons, even personally, unless such entertainment does not violate laws and is consistent with normal custom/tradition.
3. **Timing and Intent** Entertainment should generally follow business dealings. If it occurs beforehand, it must be solely to promote the Company's products/services, and any implication that entertainment is in exchange for a business decision must be strictly avoided.

Controls and Documentation

- The requester must submit a clear written approval request detailing purpose, hosting department, and supporting documents.

- Approvers must review requests considering **purpose and appropriateness** and approval per the **Company's approval matrix**.
- The requester must **report and submit evidence** (e.g., receipts) to **Finance & Accounting** for audit and recordkeeping.

14. Guidelines on Charitable Donations and Sponsorships

To ensure donations and sponsorships are **transparent, genuinely charitable, and not used to seeking returns** that could be construed as corruption, the Company adopts the following guidelines:

14.1 Objectives and Principles

1. **Appropriateness and Transparency** Donations and sponsorships must be considered in line with these guidelines to ensure **transparency** and that no **benefit or return** is expected that could be deemed corrupt.
 - 1.1 **Charitable Donations (Public Benefit and Image)** Must aim to promote the Company's positive image and **benefit society at large**, reflecting corporate social responsibility—**without expectation of improper benefit**.
 - 1.2 **Community Recognition** May aim to support Company operations by building understanding and acceptance within surrounding communities.
 - 1.3 **Stakeholder Relations** May strengthens long-term trust and relationships with stakeholders—**without improper benefit**.
 - 1.4 **Sponsorships** May support successful project outcomes and the Company's business, image, and reputation—**without expectation of improper returns**.
 - 1.5 **In the Name of the Company** All donations and sponsorships must be made **in the Company's name only**, relate to **verifiable activities**, and be **auditable**.

14.2 Processes and Approval

- Any unit wishing to donate or sponsor must submit a request **via the line supervisor** to the **authorized approver**.
- Supervisors must **review** to ensure objectives align with these guidelines.
- After execution, the requesting unit must submit **evidence** (e.g., from recipient, photos, receipts) to **Accounting** as official records.

14.3 Finance & Accounting Review

- Finance & Accounting shall **verify supporting evidence** and **maintain records**.
- If evidence is insufficient, Finance & Accounting shall request **additional information/explanations** from the requested unit.

14.4 Non-Compliance and Annual Audit

- If any donation/sponsorship is proven **non-compliant** with these guidelines or used as a **pretext/route for corruption**, it constitutes a **serious disciplinary offense**.
- **Internal Audit** shall **annually review** the donation/sponsorship process to ensure **effectiveness, efficiency, and adequate internal controls**.

Controls and Documentation

- Prepare a **written approval package** specifying project details, objectives, method, and requester's due-diligence confirmation that the project **exists and is verifiable**.
- Obtain approval from management by the **delegation of authority before** execution.
- The requester must **collect supporting documents** (e.g., acknowledgment letters, receipts) and **submit a report to Finance & Accounting** for audit and acknowledgement.

15. Political Contributions

The Company strictly prohibits any **payment, donation, or provision of assets or other benefits** to support political activities. The Company has **no policy or practice** to provide political assistance to any political party, politician, or politically affiliated individual—**whether directly or indirectly**—for the purpose of obtaining privileges, undue benefits, or business advantages.

This prohibition, however, **does not restrict employees' constitutional rights** to participate in political activities as private citizens, in accordance with the Constitution and applicable laws. Directors, executives, and employees of the Company and its subsidiaries have the right to **participate in lawful political activities**, such as voting in elections or referendums.

However:

- They must **not use the Company's property, resources, or working hours** for political purposes.
- They must **not act or speak on behalf of the Company or its subsidiaries** in political matters.
- They must **not imply or cause misunderstanding** that the Company or its subsidiaries are involved in or support any political activity.

16. Guideline for Managing Conflict of Interest

The Group comprises multiple subsidiaries with similar lending businesses, which could potentially give rise to conflicts of interest. To mitigate this risk, the Group has **clearly segregated its lending businesses**, established **policies, measures, and operational manuals**, and utilizes **technology systems** to ensure proper process separation and minimize conflicts of interest.

The Group's **operational control policy** ensures that management directives are effectively implemented by all personnel through:

- Clear delegation of authority and approval limits.
- Proper segregation of duties to prevent fraud; and
- Established procedures for transactions involving major shareholders, directors, executives, or related persons, in accordance with the **Capital Market Supervisory Board (CMSB)** and the **Stock Exchange of Thailand (SET)** requirements.

Conflict of Interest Control Principles

1. **Board-Level Oversight** The Board of Directors has established a **Conflict of Interest Policy** based on the principle that all business decisions must serve **the best interests of the Company**. Individuals involved in a transaction that could present a conflict must **not participate in discussions or approvals**. The Board shall ensure that all such transactions comply with **regulatory procedures and disclosure requirements**.
2. **Integrity and Independence** The Board shall oversee and prevent any conflict of interest among directors or executives, including improper use of Company assets. All actions must be taken **honestly, prudently, independently, and within ethical boundaries**.
3. **Audit Committee Review** The Audit Committee shall review and opine on **related-party transactions (RPTs)** and **acquisition/disposal of assets**, ensuring proper disclosure and compliance with relevant laws. It must ensure such transactions are **reasonable, transparent, and in the Company's best interest** before seeking approval from the Board and/or shareholders.
4. **Disclosure of External Interests** Directors and executives must **annually report** any directorships, shareholdings, or partnerships in other entities—including those of **spouses and minor children**—to prevent potential conflicts of interest.
5. **Restrictions on Interested Parties** Persons with potential conflicts of interest or stakes in a transaction **must not participate in approvals**. If a transaction involves related parties, the Audit Committee shall review **necessity, reasonableness, and pricing fairness**, referencing market standards. If the Audit Committee lacks expertise, the Company may engage **independent experts**—such as auditors, appraisers, or law firms—to provide impartial opinions for the Board or shareholders. All parties-related transactions must be **disclosed in the Company's audited financial statements**.
6. **Avoidance of Self-Interested Transactions** Directors, executives, and employees must avoid engaging in any **self-related transaction** that could conflict with the Company's interests. All business decisions must be made **solely for the Company's benefit**.
7. **Disclosure of Competing Interests** Any director, executive, or employee (including family members) holding shares or participating in a business that **competes with or conflicts with** the Company's business must **notify the Board of Directors in writing**.

8. **Financial or Personal Relationships** All employees must avoid **financial or personal relationships** with external parties that could cause the Company to lose benefits or impair effective performance.
9. **Confidentiality Obligations** During and after employment, directors, executives, and employees must **not disclose confidential information**—including electronic, financial, operational, or strategic data—for any personal or third-party benefit.
10. **Transparency and Fairness** In all cases involving potential conflicts between shareholders, directors, executives, or related persons, decisions must adhere to principles of **fairness, transparency, reasonableness, and full disclosure.**

17. Guidelines on Facilitation Payments

The Company maintains a **strict policy prohibiting any form of facilitation payment** to government officials under all circumstances. Such payments pose a **high risk of being construed as bribery or unlawful expenses.** Therefore:

1. Employees are **strictly prohibited** from offering, promising, requesting, or accepting facilitation payments or bribes—in the form of money, assets, or any other benefits—to or from government officials to induce, delay, or influence any action that may affect the Company's operations.
2. All dealings with government agencies must be conducted **transparently, honestly, and in strict compliance with applicable laws and regulations.**
3. Directors, executives, and employees shall **not pay or accept facilitation fees** in either the public or private sector in exchange for preferential treatment or expedited services, nor accept such payments to hasten internal processes or decisions within the Company for external parties or customers.

18. Employment of Government Officials

The Company has **no policy to employ current government officers or public officials** in any capacity that may create a **conflict of interest** or be perceived as a **form of undue business advantage or reward.** The Company and its subsidiaries prioritize **comprehensive anti-corruption risk prevention** and are committed to maintaining full independence from public-sector influence.

1. **Cooling-Off Period:** Former government officials or public employees must complete a **cooling-off period**—as prescribed by relevant laws—before being eligible to apply for employment within the Company.
2. **Pre-Employment Background Check:** The Company's recruitment process includes verification of whether applicants are or were government officials. This serves as a safeguard against potential conflicts of interest, especially for management-level positions.

3. **Appointment Screening:** The Company and its subsidiaries conduct background checks for all nominees for **Board, advisory, or executive positions** to identify any possible conflicts of interest prior to appointment.
4. **Disclosure in Reports:** The Company discloses its **non-employment policy of government officials** in the **Annual Report** and **Sustainability Report** to ensure transparency and to demonstrate clear operational governance.

19. Procurement and Contracting Guidelines

All procurement activities must strictly comply with the **Company's procurement policy and procedures**, following proper approval authority and operational delegation. The process must be **fair, transparent, and accountable**, ensuring consideration of **price reasonableness, product quality, service reliability**, and compliance with **relevant standards** (e.g., environmental or industrial standards).

Procurement must be carried out with **integrity and transparency**, in accordance with:

- Company policies and regulations.
- Applicable laws; and
- Rules governing public and private sector procurement.

20. Practices Regarding the Use of Insider Information for Personal Benefit

The Company enforces clear controls to **prevent misuse of inside information (Insider Trading)**.

1. Directors, executives, senior employees (department director level and above), and persons with access to insider information are **prohibited from trading Company securities**:
 - Within **one month before** the public disclosure of quarterly or annual financial statements; and
 - within **24 hours after** the release of any significant material information.
2. Directors, executives, and employees in managerial positions in **accounting or finance** (manager level or higher) must:
 - Report every purchase or sale of Company securities to the **Securities and Exchange Commission (SEC)** within **3 business days**, as required by the **Securities and Exchange Act**; and
 - Notify the **Company Secretary** of any change in their shareholding status.

21. Guidelines on Data Storage, Access, Recording, Accounting Audits, and Data Retention Procedures

The Company maintains rigorous accounting and recordkeeping processes to **support anti-corruption measures** and **prevent fraudulent activities**, as follows:

1. **Accounting Review and Authorization:** All accounting entries must receive **proper approval** before being recorded. Verification against Company policies, applicable laws, and contractual obligations is required to ensure compliance with **accounting standards and internal policies**.
2. **Supporting Documentation:** All operating and capital expenditures must be **fully supported by accurate and complete documentation and approved within authorized limits**.
3. **Financial Reporting:** Financial reports must be **accurate, truthful, reliable**, and must **fully disclose material information**, including related-party transactions and contingent liabilities.
4. **Document and Data Security:** The Company enforces strict controls over **accounting document storage and data access** to ensure records are available for immediate audit. Backup files are securely stored to safeguard accounting data integrity.

22. Human Resource Management Practices

The Company integrates **anti-corruption and anti-bribery principles** into all aspects of **human resource management (HRM)** to ensure effective prevention of corruption in every form. Key HR measures include:

1. **Integration into HR Processes** The Company incorporates anti-corruption policies into all HR processes—recruitment and selection, promotion, training, performance evaluation, and compensation. Supervisors at all levels are responsible for **communicating and reinforcing** anti-corruption policies to employees within their areas of responsibility and ensuring effective compliance.
2. **Induction and Awareness for New Employees** All new hires participate in an **orientation program** designed to instill understanding and awareness of the Company's anti-corruption policy, its expectations, and the disciplinary consequences of non-compliance.
3. **Fair Treatment and Whistleblower Protection** The Company ensures **fair and protective HR practices** toward employees who **refuse or report corruption**. No demotion, punishment, or adverse treatment shall be imposed on employees who decline to participate in corrupt activities, even if such refusal results in business opportunity loss. A secure **whistleblowing channel** and protection mechanism is in place for employees seeking to report or seek guidance regarding anti-corruption issues.

23. Guidelines for Sourcing and Selecting Business Partners and Representatives

This policy applies to all **directors, executives, employees of the Company and its subsidiaries, and business representatives** (e.g., suppliers, contractors, and service providers). The following principles shall apply:

1. **Prohibition of Corruption** No Company personnel shall engage in or be perceived to engage in any form of bribery or corruption—directly or indirectly—including giving, receiving, offering, or soliciting money, goods, or other improper benefits.

2. **Zero Tolerance in Dealings** The Company does not condone corruption in dealings with **public authorities, private entities, or individuals**, domestically or internationally.
3. **Internal Control and Risk Monitoring** Adequate internal control systems and mechanisms must be in place to **monitor, audit, and assess corruption risks** regularly.
4. **Training and Communication** The Company shall continuously provide **training and communication** on anti-corruption principles to employees and relevant stakeholders.
5. **Leadership by Example** Directors and senior executives must set a **tone at the top**, ensuring consistent adherence to this policy. All employees and stakeholders are required to comply and **promptly report** suspected corruption through official channels.
6. **Due Diligence of Suppliers and Agents** Procurement and selection of business partners must be conducted **transparently**, with **background checks** and **corruption-risk assessments** prior to engagement. Partners and agents must acknowledge and comply with the Company's anti-corruption policy through designated communication channels (e.g., email, training sessions, or contractual terms).

24. Extortion, Fraud, Theft, Embezzlement, Money Laundering, and Similar Misconduct

Directors, executives, and employees of the Company and its subsidiaries are strictly prohibited from engaging in **extortion, fraud, deception, collusion, bid-rigging, embezzlement, money laundering, cybercrime**, or any similar misconduct. This includes **misappropriation or theft of Company assets** for personal gain.

1. No director, executive, or employee shall **commit or participate** in any act constituting extortion, fraud, theft, embezzlement, or money laundering, or any act deemed corrupt or unlawful.
2. The Company and its subsidiaries maintain **strict internal controls**, especially regarding asset management, finance, and transaction approval, to prevent such misconduct.

25. Building an Organizational Culture of Integrity and Fairness

1. The Company provides **training programs** to promote honesty, integrity, and adherence to the **principles of good corporate governance** throughout all operations.
2. HR management processes—from recruitment, training, performance evaluation, compensation, to promotion—reflect the Company's **commitment to anti-corruption measures**.
3. **Clear financial and procurement regulations** are in place, defining approval limits, transaction purposes, and required documentation at each level of authority.
4. **Internal Audit** functions ensure the adequacy of internal controls, compliance with all regulations, and identification of weaknesses for continuous improvement.

5. The Company cooperates with government agencies by requiring relevant departments interacting with the public sector to disclose income–expenditure statements to the National Anti-Corruption Commission (NACC).
6. The Company Secretary, Internal Auditor, or other designated officers as assigned by the Audit Committee shall be responsible for overseeing the implementation of good corporate governance practices.

26. Monitoring, Compliance, and Policy Review

1. It is the duty and responsibility of all directors, executives, and employees to acknowledge, understand, and strictly adhere to this policy.
2. The Company does not tolerate any unlawful act or violation of this policy. Any director, executive, or employee found in violation shall be subject to disciplinary action and possible legal penalties.
3. The Board of Directors shall ensure that this policy is reviewed annually to maintain relevance and effectiveness.

Approval and Effective Date

This Anti-Corruption and Bribery Policy were approved by the Board of Directors' Meeting No. 4/2025 on 14 August 2025 and shall take effect from that date onward.

Mr. Pinit Puapan
Chairman of the Board
Srisawad Capital 1969 Public Company Limited