

Anti-corruption Policy

Pro Inside Public Company Limited

Pro Inside Public Company Limited (the "Company") conducts business with honesty and integrity, and is responsible to society and to all groups of stakeholders equally, under principles of good corporate governance that are transparent and auditable, giving importance to combating fraud and corruption. The Company has established anti-corruption guidelines, including support for activities that promote and instil in directors, executives, employees, and workers at every level, as well as the Company's representatives (collectively, the "Company's Personnel"), including subsidiaries, associated companies, or other companies over which the Company has controlling authority, as well as business representatives, compliance with the law and relevant regulations, discouraging the achievement of work success through corrupt means. The Board of Directors accordingly has an anti-corruption policy to set out clear guidelines for conducting business consistent with the principles of good corporate governance and the Company's Code of Business Conduct, regulations, requirements, and relevant laws, in order to further develop the organization towards sustainability. Subsidiaries, associated companies, other companies over which the Company has controlling authority, and business representatives, whether listed or not listed on the stock exchange, are encouraged to consider adapting this policy to their own business context through each company's internal approval process.

Objectives

1. To build awareness, values, and attitudes among the Company's Personnel so that they are not involved in any form of corruption whatsoever, including the giving of bribes in any form, whether direct or indirect.
2. To promote and build a culture of working in compliance with regulations, with honesty and integrity, and of not neglecting or disregarding any act that appears to constitute corruption connected with the Company — such acts must be reported to a supervisor or the person responsible, with cooperation given in fact-finding investigations. Where there is doubt or a question, this should be discussed with a supervisor or the person designated as responsible, through the channel established under the whistleblowing policy.
3. To promote the role and participation of relevant personnel in preventing and combating corruption connected with the Company's business.
4. To ensure that the Company's Personnel at every level understand the nature, scope, and appropriate practices, as well as the approval process, for giving and receiving gifts, entertainment, donations, sponsorships, political neutrality, and the employment of government officials.

5. To build confidence among stakeholders in conducting business together with honesty and integrity.

Principles

1. The Company's business operations must be transparent and auditable, in order to prevent corruption in all forms, whether direct or indirect, and the Company's Personnel must strictly comply with the law and the anti-corruption policy.
2. Directors, executives, and employees are prohibited from engaging in any act that constitutes soliciting or accepting any property or other benefit for themselves, their family, friends, acquaintances, or any other person, in a manner that suggests an inducement to act or to refrain from acting improperly in the performance of their duties, or that may cause the Company to lose a legitimate benefit.
3. Directors, executives, and employees are prohibited from giving or offering to give property or any other benefit to an external party, in order to induce that person to act or refrain from acting in a manner unlawful or improper to their position or duties.
4. The Company shall provide an efficient and effective internal control system, with checks and appropriate balancing of the use of authority, in order to prevent the Company's Personnel from engaging in, or being involved in, fraud or corruption.
5. This anti-corruption policy shall cover the human resources management process, from recruitment or selection of personnel, promotion, training, employee performance evaluation, and remuneration, by requiring supervisors at every level to communicate and build understanding with employees, so that this is applied in business activities within their responsibility, and to monitor and oversee effective compliance.
6. The policy shall provide for regular review of compliance with the anti-corruption policy, at least once a year, as well as review of practical guidelines to ensure consistency with policies, work regulations, requirements, rules, announcements, laws, and changes in the business. This policy covers every activity relating to the Company's operations, including the Company's business both domestically and internationally.

Scope

The Company defines the scope of stakeholders relevant to the anti-corruption policy in 2 groups, as follows:

1. Internal: comprising the Board of Directors, the Executive Committee, and employees of the Company, subsidiaries, associated companies, other companies over which the Company has controlling authority, including business representatives at every level.

2. External: comprising customers, sellers of goods or services, business partners, competitors, creditors, debtors, government agencies/the public sector, and private-sector organizations.

Definitions

1. **Fraud** means the seeking of a benefit by directors, executives, and employees of the group of companies, or by customers, business partners, or counterparties of the Company, that is improper as to their duties or unlawful — for example, falsifying financial records, using the Company's assets for personal purposes, embezzlement, misappropriation, deceit, or acts involving a conflict of interest, among others.
2. **Corruption** means the act or omission of an act in the course of one's duties, or the improper use of authority in one's position, in any form — whether the giving or accepting of a bribe, offering or promising to give, requesting, or demanding — whether in the form of property, money or its cash equivalent, other items, rights, or any other benefit — that violates morality, ethics, and applicable laws, rules, regulations, or policies, given to a government official, a private-sector official, or any other individual or juristic person that does business with the Company or the group of companies, whether domestically or internationally, in order to obtain an improper benefit for the organization, oneself, one's family, friends, or acquaintances.
3. **Bribery** means property or any other benefit that is offered to be given, promised to be given, given, accepted, requested, or demanded, that affects a decision in a manner intended to induce a person to act or refrain from acting contrary to their duties and responsibilities.
4. **Gift** means any item of monetary value, including property, cash equivalents, items used in exchange for goods or services, and souvenirs.
5. **Conflict of interest** means a situation in which a person or group of persons entrusted to act as a representative of another group makes a decision that involves their own personal interest, whether direct or indirect, where that personal interest may erode or diminish the benefit of the person or group who granted the authority to act on their behalf.
6. **Giving or receiving gifts** means the giving or receiving of gifts, souvenirs, or any other property in accordance with customs and local traditions, and includes occasions for expressing congratulations, gratitude, condolences, or assistance in accordance with socially accepted etiquette.
7. **Entertainment** means expenditure on business entertainment, such as entertainment involving food and beverages, entertainment in the form of performances, watching sports, participating in sporting activities, or study visits both domestically and internationally, including hospitality and reception, for the purpose of building business relationships, and other expenditure directly related to business practice or customary trade practice.

8. **Giving or receiving sponsorship** means financial or other support given to an activity or organization, with the purpose of business, image, and reputation benefit to the Company, which is beneficial to building trade credibility and helps strengthen business relationships.
9. **Donation** means money or property donated by the Company to generate public benefit, not for the purpose of an anticipated benefit that could be regarded as fraud or corruption.
10. **Political party support** means support given to political parties in any form, whether by giving or donating money, goods, or gifts, providing entertainment, donations, or any other form of support that can be assigned a monetary value, or providing indirect assistance, such as advertising in support of a political party, and participating in political activities, in order to gain a business advantage.
11. **Facilitation payments** means small amounts paid informally to government officials, given only to ensure that the government official carries out a process, or to induce them to act more quickly, where the process does not require the exercise of discretion by the government official and is an act properly within that official's duties, and where it is a right that the juristic person is already legally entitled to — for example, applying for a licence, requesting a certificate, or receiving public services, among others.
12. **External stakeholders** means individuals, groups of persons, or agencies that influence the Company's decision-making process, which can affect the Company's goals and success. Stakeholders also include those affected by the Company's decision-making process and those with an interest in the Company's business operations.
13. **Government official** means a person holding a political position, a civil servant or local government employee holding a position or receiving a regular salary, an employee or person working in a state enterprise or government agency, a local administrator and local council member who does not hold a political position, an official under the law governing local administration characteristics, and shall also include directors, sub-committee members, and employees of a government agency, state enterprise, or government unit, and any individual or group of persons exercising, or entrusted to exercise, governmental authority in any lawful undertaking, whether established within the civil service system, a state enterprise, or any other governmental undertaking.

Duties and Responsibilities

1. The Board of Directors has the following duties and responsibilities:

- a) Establish policy and oversee an effective system supporting anti-corruption, to ensure that management is aware of and gives importance to anti-corruption, and instils it as an organizational culture.

- b) Comply with this policy and the measures on anti-corruption and bribery, with penalties for non-compliance.

2. The Executive Committee and management have the following duties and responsibilities:

- a) Establish a system to promote and support the anti-corruption policy, in order to communicate it to employees and relevant parties, including reviewing it for continued appropriateness and consistency with changing circumstances, such as business conditions, regulations, and legal requirements.
- b) Provide measures and guidelines for implementing the policy and principles for preventing corruption, so that personnel throughout the organization adhere to and implement them continuously and strictly.
- c) Review the anti-corruption policy, provide recommendations and guidance, and monitor and evaluate performance relating to anti-corruption and the giving/receiving of bribes.

3. The Audit Committee

has the duty to review the financial and accounting reporting system, the internal control system, the internal audit system, and the risk management system, to ensure that they comply with international standards, are rigorous, appropriate, up to date, and effective.

4. The Head of Internal Audit

has the duty and responsibility to inspect and review operations to ensure they are accurate and in compliance with policy, guidelines, authority levels, regulations, and laws, and the requirements of regulatory agencies, in order to give confidence that the control system is appropriate and adequate for potential corruption risk, and to report to the Audit Committee.

5. Employees

have the duty to comply with the anti-corruption policy and must not become involved in any corruption matter, whether directly or indirectly.

Anti-Corruption Practice Guidelines

1. The Company supports and promotes awareness and a sense of responsibility for anti-corruption among personnel at every level, and provides internal controls to prevent fraud, corruption, and the giving or receiving of bribes in every form, whether direct or indirect — whether giving/receiving money, goods, gifts, entertainment, donations, support to government agencies, political assistance, or any other benefit — in order to seek benefit from persons doing business with the Company.

2. The Company has a policy of not demoting, penalizing, or taking any negative action against internal personnel who refuse to give a bribe, even where doing so causes the Company to lose business.
3. These anti-corruption guidelines cover the human resources management process, from recruitment or selection of personnel, promotion, training, performance evaluation, and remuneration of employees, by requiring supervisors at every level to communicate and build understanding with their subordinate employees, so that this is applied to business activities within their responsibility, and to monitor and oversee effective compliance with these guidelines.
4. The Company will treat fairly, and protect, employees or any other person who reports information or evidence relating to corruption connected with the Company, including employees who refuse to engage in such conduct, using protective measures for complainants or those who cooperate in reporting corruption, as set out in the Whistleblower Policy.
5. A person who commits corruption is deemed to have committed an offence under the Company's work regulations governing personnel management, and shall be subject to the disciplinary penalties prescribed, and may also be subject to legal penalties where the act is also unlawful.
6. The Company shall communicate the anti-corruption policy continuously through the Company's communication channels, such as e-mail, the Company website, and notice boards, and shall provide training on anti-corruption for the Company's Personnel.
7. The Company gives importance to disseminating and promoting knowledge and understanding among other persons who must perform duties connected with the Company, such as business partners, external stakeholders, and representatives and/or distributors, in order to build good awareness.
8. The Company shall review its practice guidelines and operating measures regularly, at least once a year, to ensure consistency with changes in the law and business operating conditions.

Practice Guidelines

1. Guidelines for Giving Gifts

The Company's Personnel may give gifts, souvenirs, or any other benefit to stakeholders, provided the following conditions are met:

- a) Gifts are given to customers, the Company's business partners, or government officials in accordance with custom, including occasions for expressing congratulations, gratitude, welcome, condolences, or assistance in accordance with socially accepted etiquette, and must not violate relevant laws and customary practice — that is, for Thailand, not exceeding THB 3,000 per person per occasion, in accordance with the announcement of the National

Anti-Corruption Commission, and must not be cash or cash equivalent, such as vouchers or gift cards, and the giving of gifts should follow a consistent standard, without discrimination.

- b) Gifts must be given only in the Company's name, not in the personal name of a director, executive, or employee of the Company.
- c) Gifts must be appropriate to the context, of appropriate value, and correct for the circumstances — for example, giving gifts at the launch of a new product or service, or at the Company's anniversary celebration; and during a bidding process, gifts to government officials or related agencies should be withheld.
- d) Gifts must not be given with malicious intent or as an act to dominate, induce, or reward any person in order to become involved, or in order to gain an advantage through improper conduct, or in order to obtain a benefit.
- e) Gifts, souvenirs, property, or any other benefit must not be given to the spouse, children, or associates of a government official, customer, business partner, or contact, since, by the circumstances, this may be regarded as receiving on the recipient's behalf.
- f) The giving of gifts must be recorded in a report on the giving or receiving of gifts or other benefits, and must be requested and approved for disbursement only by the Company's authorized approver.
- g) Gifts must not be given to customers, the Company's business partners, or government officials in the following circumstances:
 - It would violate relevant law, regulations, or the Company's policy, and the regulations of the organization regulating the Company.
 - It is not a practice consistent with business standards.
 - It falls within the scope of corruption or bribery.
 - It supports political activity.

2. Guidelines for Receiving Gifts

- a) It is prohibited to demand or request gifts, assistance, entertainment, compensation, or any other benefit from a customer or the Company's business partner, an external stakeholder, including representatives and/or distributors, or persons connected with the Company's business, under any circumstances whatsoever.
- b) It is prohibited to accept any gift or other benefit in any circumstance from a customer or the Company's business partner, an external stakeholder, including government officials, under all circumstances. Where it is necessary to accept an item or other benefit that cannot be avoided, or where the Company's Personnel are in a situation where they cannot refuse,

in order to maintain a good relationship with that person or organization, the gift or benefit received must not exceed a value of THB 3,000, must not be cash or cash equivalent, and must be received on a customary occasion, and receiving such gift must not affect the recipient's business decisions in any way, including receiving gifts under the following circumstances:

- In the case of calendars or diaries used as a promotional item of a customer or the Company's business partner, an employee may accept these as a personal gift.
 - In the case of a gift or souvenir given organization-to-organization on an important business occasion, such as a business visit — such gift or souvenir may be accepted, but shall become the property of the Company.
 - Where the Company receives an award, souvenir, or item from a competition — such as entering into a business alliance agreement, or receiving an award recognizing the Company's achievements — the Company may accept such item in the name of the organization, entrusting a management-level employee to accept it on its behalf, and such item shall be regarded as the Company's property.
- c) Where the Company's Personnel receive a gift, property, or any other benefit on a customary occasion that exceeds a reasonable value from a party with business dealings with the Company, this must be reported to a supervisor through the chain of command; where the supervisor considers it inappropriate, it must be returned to the giver immediately. Units that must liaise with business partners, customers, joint-venture partners, or other persons connected with the Company's business must regularly inform such persons of this policy.

3. Guidelines for Entertainment

Entertainment expenses must be approved by a person with authority to approve, in accordance with the Company's authority and approval schedule, or by a person delegated by such person to approve or authorize payment of such expense.

Payment of business entertainment expenses and other expenditure directly related to business practice may be made, but must be a reasonable expense that does not affect operational decision-making or create a conflict of interest.

In providing or receiving entertainment, directors, executives, and employees of the Company should be mindful of the following:

- a) Entertainment must not be given to, or received from, a customer or business partner in the following circumstances:

- It violates the law, regulations, and/or the Company's policy, including where it falls within the scope of bribery, and the regulations of the organization regulating member companies, such as the Stock Exchange of Thailand and the Office of the Securities and Exchange Commission.
 - It is intended to create influence over a business decision, and must be consistent with the Company's customary practice.
 - It would damage the Company's reputation.
 - It supports political activity.
- a) Entertainment must not be provided with an ulterior motive, or as an act to dominate, induce, or reward any person in order to become involved, or given in order to gain an advantage through improper conduct, or given in order to obtain a benefit or in exchange for any business objective, but should instead be organized to increase opportunities to promote the Company's products, or to create an opportunity to get to know customers better, at an appropriate value and correct for the circumstances. Where the Company is in the process of a bidding process, entertainment and hospitality for government officials or related agencies should be withheld.
- b) Entertainment must be given only in the Company's name, not in the personal name of a director, executive, or employee of the Company.
- c) Payment of business entertainment expenses and other related expenditure may only be made where directly related to conducting business, and must be a reasonable expense that does not affect operational decision-making or create a conflict of interest.
- d) Expenditure on general entertainment must be recorded in a report on the giving or receiving of gifts or other benefits for consideration, and must be approved by a person with authority under the approval schedule, or a person delegated by such person to approve entertainment expenses, and must be for the purpose of building business relationships.

Where the Company, a group company, or any unit wishes to give or receive a gift, or to provide entertainment to any person or external agency, in accordance with custom and/or business practice, for the purpose of maintaining a good relationship and not in violation of the law, this may be done by following these steps:

- The proposing or receiving unit should consider whether giving or receiving the gift, including entertainment, complies with what the Company or group of companies has set out in the Company's policy.

- If it complies with the established criteria, the relevant unit should record a report on the giving or receiving of gifts or other benefits, and submit the matter for approval under the Company's established approval authority.
- The accounting and finance department should review supporting documents for preparing the payment voucher, send the cheque to the authorized person for signature, and keep all documentation on file, so that it can be traced and verified.

4. Guidelines for Donations

The Company's Personnel must observe the following with care:

- a) Using the Company's money or property for donations must be done only in the Company's name.
- b) Donations must be made to foundations, public charitable organizations, temples, hospitals, schools, universities, medical facilities, or organizations for social benefit.
- c) Donations must be transparent and legally correct, and must be confirmed not to have been used as a pretext for giving or receiving bribes.
- d) Donations must be recorded in a report on donations/sponsorship, and must be requested and approved for disbursement only by the Company's authorized approver.
- e) Approval of donations: the Human Resources department is responsible for receiving requests from those seeking donations, and for verifying documentation from foundations, public charitable organizations, and government agencies, and for sending all donation documentation to the accounting department to be kept as evidence, for use as supporting information in audits.
- f) Where it is found that an employee or group of persons intended to fraudulently divert cash/property/goods/materials intended for donation, or where an audit finds any irregular item, or where the donation involves conduct suggestive of fraud or corruption, resulting in damage to the Company, that employee or group of persons must be responsible for compensating all resulting damage, shall be subject to disciplinary proceedings and severe disciplinary penalties under the Company's regulations, and this must be reported immediately to management.

5. Guidelines for Giving Sponsorship

The Company's Personnel must observe the following with care:

- a) Giving sponsorship must be confirmed not to have been used as a pretext for giving or receiving bribes.

- b) Directors, executives, and employees of the Company must not act as intermediaries in offering money, property, goods, or any other benefit to persons connected with the Company's business, including government agencies, in exchange for undue special privileges, or to cause a government official to disregard compliance with regulations and legal requirements.
- c) Dealings with government agencies must be transparent, and must be carried out in compliance with relevant laws, and giving and receiving bribes in any type of business dealing is prohibited.
- d) Giving sponsorship must be verifiable — that the party requesting sponsorship actually carried out the activity under the relevant project, and that the sponsorship is given to support the success of the project's objectives, to advertise and promote the Company's business or brand, or is consistent with the objectives of genuinely responsible social conduct.
- e) The use of the Company's money or property to sponsor a project must be identified only in the Company's name, and sponsorship must be given for a business purpose, to give the Company a good image and reputation; disbursement must specify a clear purpose, with verifiable evidence, and must go through the Company's prescribed procedures.
- f) The party requesting sponsorship must record a report on donations/sponsorship, identifying the name of the sponsorship recipient, details, and the purpose of the sponsorship, which must be requested and approved for disbursement only by the Company's authorized approver.

Where the Company or a group company wishes to donate money or provide sponsorship or property for public charity, or where any person or agency notifies its wish to receive a donation or sponsorship from the Company for charitable purposes, the following steps should be followed:

- For a donation of money or property for charity, the unit proposing the matter must consider whether the donation complies with the donation guidelines.
- Verify supporting information for the donation — for example, that there is a clear purpose, a definite existing organization, and a responsible person.
- The relevant unit should record a report on donations/sponsorship, and submit the matter for approval under the Company's established approval authority.
- The unit or department responsible for the donation, and/or the accounting and finance department, should prepare the payment voucher/asset transfer voucher for the donation.

The accounting and finance department shall prepare the cheque for the authorized signatory, follow up on correct proof of receipt of funds — and, in the case of a donation of property, obtain evidence of receipt of the property — and keep all documentation on file, so that it can be traced and verified.

6. Guidelines for Supporting Political Parties

The Company recognizes the importance of political participation as a socially responsible organization; however, the Company maintains political neutrality, does not favour any political party or group, and does not support the activities of any particular political party or any particular political candidate. The Company has established clear practice guidelines to prevent any act that may fall within the scope of improper political party support, which could lead to corruption, as follows:

- a) It is prohibited to donate money or any other property to a political party. The Company will not provide financial support to any political party, whether in the form of direct donations or through a related foundation or other organization.
- b) It is prohibited to use the Company's resources for political benefit. The Company's employees and executives shall not use the Company's resources, such as working time, vehicles, or office equipment, to support any political party's activities.
- c) It is prohibited to give special privileges to a political party or party member. The Company will not give any special privileges to a political party or party member, such as special discounts, free services, or the provision of internal information.
- d) Employees may participate in politics as private individuals, using personal time outside the Company's working hours and personal resources for such political activities.
- e) A director or employee must resign from their position as director or employee if they are to hold a political position or run for election at the local or national level.

7. Guidelines for the Payment of Facilitation Payments

The Company has no policy of paying facilitation payments to government officials, customers, sellers, or other trading partners, in any form, whether direct or indirect.

8. Guidelines for Procurement and the Engagement of Third Parties

Procurement must comply with the Company's regulations and must be conducted transparently, be auditable, and legally correct, without any concealed interest, and the use of a third party to liaise with a government official or government agency must not be a means of channelling a bribe to that third party.

Channels for Reporting Tips or Complaints

The Audit Committee shall be responsible for receiving reports of whistleblowing tips or complaints regarding conduct that gives rise to reasonable suspicion of corruption occurring at the Company, whether directly or indirectly, through the reporting channels set out in the Whistleblower Policy, as follows:

1. By e-mail, to: whistle-blower@proinside.co.th
2. By post, addressed to: the Audit Committee, Pro Inside Public Company Limited, No. 55, A.A. Capital Ratchada Building, 5th Floor, Ratchadapisek Road, Din Daeng, Din Daeng, Bangkok 10400
3. Online, at: <http://www.proinside.co.th/contact/whistleblowing>

Persons who may report tips or complaints regarding corruption are all groups of the Company's stakeholders, namely shareholders, customers, trade competitors, creditors, the public sector, communities, society, executives, and employees of the Company. Regardless of the method used to report, the Company shall keep the reporting person's information confidential.

For inquiries or requests for advice or guidance on compliance with anti-corruption measures, contact may be made by e-mail at: whistle-blower@proinside.co.th

Protection and Confidentiality Measures

1. A person reporting a tip or cooperating in a fact-finding investigation is not required to identify themselves, if they believe that disclosing their identity may result in danger or any impact on themselves or those close to them.
2. Any information that could identify the whistleblower or the person cooperating in a fact-finding investigation shall be kept confidential. The Company shall proceed with as much care as necessary for the purpose of fact-finding, giving primary regard to safety and the impact on the whistleblower, the person cooperating in the investigation, and any related persons.
3. A whistleblower and any person who cooperates in an investigation or provides information in good faith will not be subject to disciplinary action, accusation, salary reduction, demotion, or reduction in position, for having genuinely and in good faith provided information to the Company that is not a malicious defamation of another person, and shall be protected from any act that causes them to be affected or unsafe, such as intimidation, harassment, obstruction, interference with work, or any act constituting bullying or unfair treatment.
4. The Company will not demote, penalize, or take any negative action against an employee who refuses to engage in corruption, even where this causes the Company to lose a business opportunity.
5. Where a whistleblower or a person cooperating in an investigation believes they have been intimidated, harassed, obstructed, had their work interfered with, or subjected to bullying or unfair

treatment, this should be reported through the above whistleblowing channel. The whistleblower or person cooperating in the investigation may also request that the Company establish any additional appropriate protective measures.

Penalties

Directors, executives, employees, workers, and all personnel of the Company have a duty to comply with the anti-corruption policy. The following acts shall be regarded as disciplinary offences, and the Company shall consider penalties in accordance with the work regulations and rules established by the Company, which may include termination of employment in serious and necessary cases; that person shall also be responsible for compensating the Company or any person affected by such conduct, and, where the act is also unlawful, the Company shall consider proceeding under the relevant law as well. Acts falling within the scope of an offence include the following:

- Failure to comply with the anti-corruption policy and code of business conduct.
- Advising, promoting, or supporting another person's non-compliance with the anti-corruption policy.
- Neglecting or disregarding a discovered violation of, or non-compliance with, the anti-corruption policy, in circumstances where the person knew or should have known, because it relates to work within that person's responsibility.
- Failing to cooperate with, or obstructing, an investigation or fact-finding inquiry into an alleged violation of the anti-corruption policy.
- Unfair treatment of another person because that person reported non-compliance with the anti-corruption policy.

Mr. Wisudhi Srisuphan

Chairman of the Board

APPENDIX A**Common Forms of Corruption Occurring in Organizations**

To ensure that all employees have consistent awareness and understanding, and can accurately identify prohibited conduct that may fall within the scope of corruption, the Company wishes to explain common forms of corruption found in organizations, covering conduct directed at both government agencies and private-sector organizations. All personnel are asked to exercise caution and sound judgment, and to refrain from any act that may constitute corruption, whether committed directly or through a third party (such as an agent, advisor, or business partner), which shall be regarded as a serious violation of the anti-corruption policy, as follows:

1. Bribery

Giving a bribe:

- Paying money, gifts, or providing other benefits to a government official, to expedite a licensing process or to win a project bid.
- Providing a kickback to a customer company's procurement staff, so that the customer chooses to purchase the Company's goods or services.
- Paying an unusually high commission to an intermediary or agent, knowing that part of the money will be used as a bribe.

Receiving a bribe:

- A procurement employee demanding money or benefits from a business partner in exchange for approving that partner as a selected seller.
- A quality control (QC) inspector accepting lavish entertainment from a manufacturer in exchange for allowing substandard goods to pass.
- A human resources manager accepting money from a job applicant in exchange for helping them get hired.
- A sales/marketing employee receiving a personal benefit, such as an overseas family holiday, from a customer, in exchange for giving a special discount outside of policy, or granting a longer-than-normal credit term.

2. Embezzlement / Fraud

- Claiming false expenses, such as creating fake receipts or inflating travel expense claims.
- Using the Company's assets — such as office equipment, stock, or vehicles — for personal use or selling them.
- An accounting employee transferring the Company's money into a personal account, or falsifying financial documents to conceal fraud.

3. Forgery / Falsification

- Altering figures in a price quotation to favour a particular seller.
- Signing a document on behalf of an authorized person without permission.
- Creating a false product test report to make a product appear to meet standards.

4. Facilitation Payments ("Under-the-Table Money")

Paying a small amount to a frontline government official to expedite a normal process that must already be carried out — for example, paying extra to a customs official to expedite the clearance of goods, or paying a local official to speed up a minor licensing process to which one is already entitled. It should be remembered that this type of payment constitutes a form of bribery and is illegal in many countries.

5. Bid Rigging

- An employee secretly disclosing a competing bidder's price information to another bidder, to give them an advantage in the competition.
- Agreeing with another company participating in a bid to take turns winning each bid.

6. Misuse of Inside Information

- An employee disclosing trade secrets or the Company's business plan information to a competitor, in exchange for a personal benefit.
- Disclosing information about an upcoming project to a family member, so that they can set up a company to take on the work.
- A procurement manager approving the purchase of goods from a company owned by their spouse, at a price higher than the market price.

7. Inappropriate Gifts, Entertainment, and Other Expenses

While giving gifts or entertainment in accordance with business custom may be acceptable, it immediately becomes corruption where there is intent to induce an unfair business decision, or where the value is excessive beyond what is reasonable:

- Giving an unduly lavish or extravagant gift or entertainment to a customer or government official, which may be seen as an attempt to influence a decision.
- Giving a gift or entertainment at a critical time, such as during a bidding process or during contract negotiations.
- Giving a gift or benefit to a family member of a customer or government official.
- Providing travel or accommodation expenses to a government official or customer for a "personal holiday" disguised as business travel, without a clear and reasonable business purpose.

Note: The above list is intended only as illustrative examples to aid understanding, and does not cover every form of fraudulent conduct. Employees must exercise judgment and adhere to the highest standards of honesty and integrity. Understanding these examples will help employees perform their duties confidently and correctly, in accordance with principles of corporate governance and good corporate governance. If an employee discovers or suspects conduct that may fall within the scope of corruption, please report it immediately through the whistleblowing channel established by the Company.

Mr. Wisudhi Srisuphan

Chairman of the Board