



Third Revision

Anti-Corruption Policy

Thai Wacoal Public Company Limited

Thai Wacoal Public Company Limited is fully committed to conducting its businesses in an honest, open, transparent, and accountable manner within the principles of good corporate governance, together with placing emphasis on an anti-corruption by promoting awareness and conscience among company employees at all levels to fight all forms of corruption, which is consistent with being a member of Thai Private Sector Collective Action Against Corruption (CAC).

The company hereby set forth practical guidelines in implementing its anti-corruption policy as follows:

The Anti-Corruption Policy

The company is firmly committed to uphold such practice stipulated by laws relating to anti-corruption in Thailand, by strictly instructing all company directors, management members, and company employees, not to engage in, condone, or encourage, any act alleged as corruption practices, in any form, whether directly or indirectly, enforceable upon all business categories and all departments concerned.

In that regard, the company hereby set relevant practical guidelines as follows:

1. The company shall not engage in and encourage any act in accepting bribes and payment of facilitation in any form
2. In the event that the company offering charitable donation or accepting donation, being a supporter or a recipient, giving political support, hiring government employees or state officials, including giving or receiving gifts, entertainment and hospitality, the company will proceed according to the prescribed regulations and operating guidelines.
3. Supporting enhancement of awareness and value for anti-corruption among the company directors, management members, and company employees to perform duties in accordance with relevant laws, notifications and regulations by preparing such manual for practical guidelines.

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4. The company directors, management members, and company employees must not act as an intermediary in demanding and accepting or offering any financial favours or other forms of benefits from government sectors or private sector, which induces to violate the laws. Moreover, it is illegal to use positions and/or duties to use the company's data to seek benefits for oneself or others.
5. Setting the system to report financial status transparently and accurately, providing an efficient and effective internal control system, and controlling check-and-balance system to be appropriate in order to prevent conducting any fraud or taking part in any fraud and corruption.
6. Monitoring and reviewing the anti-corruption policy, guidelines and regulations consistently for operation in order to adjust with business changes, laws and regulations.
7. Establishing adequate communication channel allowing the whistleblower to provide any confidential information or justifiable allegation related to fraud attempts, while ensuring that said whistleblower obtain protection.

This anti-corruption policy has been approved by The Board of Directors' meeting no.5/2021 dated July 22, 2021, and shall take effect from August 1, 2021 onwards.

A blue ink signature of Manu Leelanuwatana, written in a cursive style.

(Mr. Manu Leelanuwatana)

Chairman



Regulations on Compliance with the Policy on Anti-Corruption

Thai Wacoal Public Company Limited

Announced on August 1, 2022

Thai Wacoal Public Company Limited is fully committed to conducting its businesses in an honest and transparent manner as well as in accordance with the principles of good corporate governance and focusing on anti-corruption.

The Company has established this Regulations on Compliance with the Policy on Anti-Corruption to serve as operating guidelines for Directors, the Management and employees of the Company and to which they must strictly adhered.

SECTION 1

Definitions

Corruption means undertaking or neglecting to undertake any actions in accordance with the assigned responsibilities of the position, or the improper use or abuse of the assigned authority. This also includes the giving and receiving of any bribes or making and offering of any promises to; or requesting or proposing to receive any assets or other benefits from any officials working in a government agency or a private sector organization or any other involved persons - whether directly or indirectly - so as to gain any business related benefits in an improper manner, with the exception of those occasions where the laws, announced regulations and customary and traditional behaviors accept and allow.

The Company person means all the Directors, Management, and company employees.

Government employee or state officials means a person holding a political position, Government official or local official assuming a position or having permanent salaries, official or person performing duties in a State enterprise or a State agency, local administrator and member of a local assembly who is not a person holding a political position, official under the law on local administration and shall include a member of a Board, Commission, Committee or of a sub-committee, employee of a Government agency, State enterprise or State agency and person or group of persons exercising or entrusted to exercise the State's administrative power in the performance of a particular act under the



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law, whether established under the governmental bureaucratic channel or by a State enterprise or other State undertaking.

SECTION 2

Duties and Responsibilities

1. **The Board of Directors** has the responsibility to define policies and oversee that adequate support systems are in place relating to effective anti-corruption policy and practices, so as to ensure that the Management recognizes the full importance of anti-corruption practices and embeds them as an integral part of the corporate culture.

2. **The Audit Committee** has the responsibility to review the conduct of the Company's businesses, so as to be sure that the operating activities of all the departments are effective with regard to as well as in full accordance with the anti-corruption policy.

3. **The Risk Management Committee** has the responsibility to oversee and support the implementation of the established risk management measures.

4. **The Corporate Governance and Sustainable Development Committee** has the responsibility to determine and review the anti-corruption policy and related regulations for submitting to the Board of Directors, as well as to oversee and support the various activities undertaken within the Company to be in full accordance with the established policy.

5. **The Executive Committee**, in its capacity of overall management oversight, is responsible for ensuring that the Company has in place an effective anti-corruption policy for implementation; as well as for promoting and supporting the Management, employees and all those involved with the Company to be informed of and fully understand the established anti-corruption policy and also the related regulations, together with regularly reviewing that the various associated systems and measures are appropriate.

6. **Internal Audit Office** has the responsibility to for the audit and review of the operations activities, so as to be sure that the internal controls system is appropriate and adequate to effectively handle the risks of corruption.

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7. **Anti-Corruption Working Group** has the responsibility to determine and establish the anti-corruption policy and related regulations, to promote, support, supervise, and monitor their actual implementation and compliance, and to receive any information or complaints from whistle-blowers; as well as, in the event of any occurrence of suspected corrupt activities, to establish an ad hoc committee to investigate and then to report the results of the investigation committee to the Corporate Governance and Sustainable Development Committee.

8. **Supervisors/ Superior Officers at all levels** have the duties and responsibility to oversee their respective work group under their responsibility, so as to ensure that the work group's activities are in full compliance with the established anti-corruption policy and related regulations, as well as to communicate with, inform and promote full compliance on the part of their respective subordinates, including acting as a role model for employees.

9. **Company employee** has the responsibility to fully comply with the anti-corruption policy and related regulations, as well as to report or submit any relevant information regarding any acts of corruption.

SECTION 3

Operating Guidelines

1. All Directors, the Management and employees are to be informed, acknowledge and act in compliance with the anti-corruption policy and related regulations.

2. All Directors, the Management and employees must not act in a negligent manner or fail to take appropriate action upon coming across any activities that are considered to be acts of corruption and involving the Company, through reporting and informing such incidents via the established channels of communications within the Company together with cooperating fully in the investigation process to find the true facts.

3. In the event that any employee is unclear or feels unsure that an action may be considered as an act of corruption, the employee should contact and ask for advice from the direct Supervisor or any Superior Officer above the Supervisor's level or the Chairman of the Anti-Corruption Working Group or a Member of the Corporate Governance and Sustainable Development Committee

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4. The Company has established a system for the procurement/ purchasing goods and services that is equitable and transparent, and maintains accepted standards of operations together with

5. The Company has established a human resources management system that is fully transparent and equitable, and that fully reflects the Company's commitment to being against corruption - namely: from the recruitment and hiring process, training activities, job performance evaluation, consideration process for associated remuneration and compensation, as well as to the implementation employee promotions and undertaking any employee disciplinary actions.

6. The Company has established an accounting system to record all transactions, which are ready to be audited to confirm their full correctness and appropriateness as financial reports, together with relevant supporting documents that adequately and comprehensively record each specific working process and steps in accordance with general accepted accounting standards and principles as well as involved applicable laws.

7. The Company has established an audit system and an internal controls system, together with risk management measures, in order to ensure that the working procedures of the Company are comprehensive, concise and adequate, as well as can prevent against any acts of corruption.

8. The Company will provide fairness and protect the Company person that denies corruption or reports clues or complaints in good faith in relation to corruption related to the Company.

9. Any Director, the Management and employee, who breach or do not comply with the established anti-corruption policy, will be subject to punishment in accordance with the disciplinary measures of the Company together with any applicable civil and criminal prosecution if any relevant laws are also broken.

10. The Company has committed to creating and maintaining corporate culture that adheres to conducting business on the basis of morality and ethics and rejects all forms of corruption.

11. The Company has communicated all relevant information, so as to create full understanding together with holding various training courses on the established anti-corruption policy and related regulations for all Directors, the Management and employees.

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12. The Company has arranged to communicate the established anti-corruption policy to all its Subsidiary Companies, Associate Companies, and other Companies within the control of the Company, as well as encourage and support them to adopt and act in full compliance with the anti-corruption policy accordingly.

13. The Company has arranged to disseminate, inform and educate those who are involved in undertaking business activities together with the Company or who are in a position to possibly have an impact on the Company, so that they can be fully aware of, acknowledge and also act in full compliance with the established anti-corruption policy accordingly.

14. The Company has arranged to disclose and communicate the anti-corruption policy and whistleblowing channel to public through the Company's website and the annual registration statement / annual report (Form 56-1 One Report).

15. The Company's anti-corruption policy is to be consistent with anti-corruption laws of Thailand.

16. The Company has reviewed the anti-corruption policy and the related regulations on an annual basis.

SECTION 4

Forms of Corruption

1. **Giving political support** means giving any financial contributions or any other kind of support in order to promote and assist any political activities - such as: giving goods or providing services to as well as advertising, promoting or campaigning for any political party; buying tickets to attend any associated events to collect money or giving any financial contributions to organizations that are closely associated with a political party; together with giving support by allowing employees to participate, in the name of the Company, in any politically related activities so as to gain some business related competitive advantage.

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Operating guidelines

1.1 The Company has a policy to be impartial and unbiased with regard to politics, through not giving any form of support by undertaking any actions in being aligned with or biased towards any one particular political party.

1.2 The Company has communicated and informed its Directors, the Management, and employees that the Company will not participate in or give support to any political party or political activities; as well as that they should avoid expressing any political opinions within the Company that may lead to any internal conflict or arguments among the employees.

1.3 In the event that the Company should wish to undertake any political activities, it is only to show its support for and promote the overall principles and system of democracy, without any hidden agenda or objective to gain any business related benefits; whereby such actions must be undertaken in accordance with the established rules and regulations of the Company.

1.4 Directors, the Management and employees have the personal rights and freedom, under the laws and overall legal framework, to participate in any political activities in a personal capacity; whereby they need to always act in a careful manner since the society may see and misunderstand these personal actions as being an act of giving support in the name of the Company to one or other particular political party.

2. Giving charitable donations or accepting donations means giving or receiving assistance in the form of money or in any other manner, that is part of the overall corporate public relations and promotional activities aimed at enhancing the corporate image of the Company, together with being a means of giving back to society as a whole without the intent to gain any business related compensation or benefits.

Operating guidelines

2.1 Giving charitable donations must be done in the name of the Company, through donating to a charitable foundation or public charity organization, educational institution, hospital or medical institution, or an organization providing social assistance that is credible, traceable and no social criticism.

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2.2 Giving charitable donations or accepting donations in a transparent manner and in accordance with the rules and regulations of the Company.

2.3 Giving charitable donations in a personal capacity should be done in a careful manner, since such actions may be seen and misunderstood as being undertaken in the name of the Company.

2.4 The Company has a policy not to accept donations for any benefit of the Company, except as a representative for receiving donations to help those affected by floods, storms, fires, or other natural disasters, or for charity.

3. **Being a supporter or a recipient** means giving or receiving support or assistance - in the form of money or in any other manner - with the intent of being an act of public relations to promote a business, brand or product as well as with the core objective of promoting a positive corporate image - such as: activities for supporting education, or promoting the arts and culture, sport events.

Operating guidelines

3.1 Giving or receiving charitable donations must be done in the name of the Company

3.2 In being a supporter, the giving party must be sure that the requesting/ recipient party will undertake the proposed activities in a genuine manner, so as to create actual and genuine benefits for society; or that it corresponds to the established Corporate Social Responsibility related activities of the Company.

3.3 In being a supporter or a recipient, must act in a transparent manner as well as in accordance with the rules and regulations of the Company.

4. **Expenses relating to gifts, entertainment and hospitality** means the giving or receiving of any gifts or benefit or any acts of entertainment and hospitality that aim to establish and enhance positive business relationships.

Operating guidelines

4.1 Directors, the Management and employees must not request in an indirect manner, or make specific demands, or ask for any gifts or any form of entertainment or hospitality from clients/ customers, business partners or any involved Stakeholders of the Company's business.

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4.2 Directors, the Management and employees are allowed to give and receive gifts as well as any form of entertainment or hospitality from or to any persons, whereby such actions follow these operating guidelines:

- (1) Such actions are in accordance with the business ethics and customary traditions as well as the applicable rules and regulations of the Company.
- (2) Such acts of giving and receiving are undertaken in the name of the Company and not in a personal capacity, as well as done in an open manner.
- (3) The gift is not in the form of cash or cash equivalent - such as, gift checks or gift vouchers. Except in case of expressing condolences, the Company is allowed to give cash by complying with the rules and regulations of the Company.
- (4) The value of the gift is appropriate to the occasion, customs or traditions and situation - such as, small gift items given on festive occasions that is considered as a normal customary practice.
- (5) It is prohibited to give or receive gifts or acts of entertainment or hospitality during a process of negotiating any important business transactions of a high value - such as, a proposal or bidding or procurement process for a project, or sales/purchase contract.

4.3 Requests for expenses relating to the gift or act of entertainment or hospitality is in accordance with the rules and regulations of the Company.

4.4 The giving or receiving of the gift or act of entertainment or hospitality does not require or involve an amount of money that exceeds any amount considered to be appropriate, or is undertaken too frequently so as to be considered inappropriate.

4.5 Receiving of a gift or act of entertainment or hospitality is in accordance with customary traditions and cannot be declined to accept; whereby the employee can accept or offer the gift or acts of entertainment or hospitality that is not of a value beyond those that are specified in the rules and regulations of the Company; and the employee reports such acts to the direct Superior. If it is a gift item, then it must be handed over to the specified internal Department for further action as required and specified.

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4.6 The Company has arranged to publicize and inform its customers/ clients, business partners, and any involved Stakeholders in the Company's business of the associated policy and operating guidelines of the Company relating to the giving and receiving of gifts and acts entertainment or hospitality on their part.

5. **Facilitation payments** means an unofficial payments made to government employees or state officials to ensure that government employees or state officials will proceed with the process or encourage quicker action, which the process does not require the discretion of a government employee or a state official and is an act in accordance with the duties of that government employee or that state official, and also including the Company's legal right, such as applying for a license, requesting a certificate and obtaining public services, etc.

Operating Guidelines

The Company has a policy not to pay facilitation payments to government employees or state officials in any form, both directly and indirectly, including the Company will not accept any action in exchange for facilitating business operations.

6. **Conflict of interests** means any situations or actions that lead to a conflict between the personal interests and those of the Company, whether directly or indirectly.

Operating Guidelines

6.1 The Company has dealt with conflict of interests prudently, fairly and reasonably, and has a transparent process for approval to enter into the transaction, including no give special benefits or special privileges to any person.

6.2 Directors, the Management and employees should attach more importance to the overall interests of the Company over their own personal interests; and should discharge their duties and responsibilities for the overall benefit of the Company, within the framework of the applicable laws and good moral ethics, as well as not to give any special benefits or privileges to any parties.

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6.3 Directors, the Management and employees are prohibited from making any decisions or being involved in deciding on any matters/ transactions in which they have a personal vested interest.

6.4 Directors, the Management and employees are prohibited from seeking benefits from information or anything they know from their position, duties and responsibilities for themselves or others.

7. **Relationships between the Public Sector or the Private Sector** means the ongoing business related contacts between the Public/ Government Sector or the Private Sector including contacting government officials or private sector officials in order to obtain a business advantage.

Operating Guidelines

Directors, the Management and employees must undertake any associated activities in this regards with full transparency, honesty and integrity as well as in full accordance with the rules and regulations of the Company together with the involved and applicable laws.

8. **Hiring government employee or state officials (Revolving Door)** means the Company hire someone from the government sector or a former government employee or a former government official to become a consultant, Directors, the Management or employees of the Company or the Company person who also involved in issuing the government policy. This may create a risk of corruption in respect of the conflict of interests of the person who has a role in both organizations, which may act unfairly or trying to push the government policy to benefit the Company.

Operating Guidelines

8.1 In the event that government employee or government officials work for the Company

8.1.1 The Company has a process to check on background of the person that will be nominated for a position as a consultant, Director, the Management and employees of the Company in order to investigate conflicts of interests prior to any appointment or employment.

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8.1.2 Employment approval and compensation for hiring government employee or state officials to hold a position in the Company must to comply with the Company's regulations by carefully considering the reasons for necessity.

8.1.3 The information of the employment of government employee or state officials has been disclosed in the Company's annual registration statement / annual report (Form 56-1 One Report) for transparency.

8.2 In the event that the Company person works for government agencies

8.2.1 The Company person is able to perform duties to help with policy for government agencies by notifying the Company.

8.2.2 In the event that the Directors, the Management or employees of the Company act involved in government policy, they must perform their duties with caution and prudence under the law and morality to prevent abuse of power or conflicts of interest.

8.2.3 The information of company person that work for government agencies has been disclosing in the Company's annual registration statement / annual report (Form 56-1 One Report) for transparency.

SECTION 5

Whistle-blowing and Complaints/ Requests

The Company has determined various procedures to facilitate the giving of information, acting as a whistle-blower, and submitting any complaints regarding any illegal and improper actions or behavior that are not in accordance with code of conduct for Company Directors, the Management and employees and on the any Directors, the Management and employees of the Company together with any activities suspected of being acts of corruptions actions; as well as established procedures to protect and treat such informants/ complainants/ whistle-blowers in a fully equitable manner.

1. Receiving information from whistle-blowers or complainants regarding

1.1 Illegal activities, or activities considered not to be in accordance with the established business ethics or code of conduct for Company Directors, the Management and employees.

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1.2 Any behavior considered as being improper and possible acts of corruption.

1.3 Any behavior seen as being a problem or issue, as well as possibly causing damages to the Company.

1.4 Any irregularities in the financial reports, or any deficiencies in the internal controls system.

1.5 Any matters that have a negative impact or adverse effect on the best interests as well as overall reputation and image of the Company

2. Procedures to receive information or complaints from whistle-blowers

Those, who come across any evidence or is aware of any or has a bone fide probable cause to suspect that Directors, the Management, or the employee has acted in an illegal manner or not in full accordance with the established business ethics and code of conduct for Company Directors, the Management and employees, or has played a part in any acts of corruption, whether directly or indirectly, is able to inform or file a complaint regarding such improper actions in the following manner:

2.1 Make a complain and inform, verbally or in a writing, to the immediate Superior; and if no response or action is taken, then inform the Superior Officer at the next level above, or Director of Human Resources and General Affairs Division.

2.2 Complain and inform via registered postal mail addressed to The Audit Committee, or Director of Human Resources and General Affairs Division, or Director of Internal Audit Office, or Chairman of Anti-Corruption Working Group, or The Company Secretary at the following mailing address:

Thai Wacoal Public Company Limited

132 Soi Charoenrat 7, Bangkhlo, Bangkholaem, Bangkok 10120

2.3 Complain and inform via email or telephone, with contact details are as follows:

Agencies	Telephone Number	E-mail Address
The Audit Committee	-	auditcommittee@wacoal.co.th
Human Resources and General Affairs Division	0-2289-3100-9, Ext. 490	hr@wacoal.co.th

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Agencies	Telephone Number	E-mail Address
Internal Audit Office	0-2289-3100-9, Ext. 207 0-2291-0591	audit@wacoal.co.th
The Anti-Corruption Working Group	0-2289-3100-9, Ext. 385	cac@wacoal.co.th
Company Secretary	0-2689-8324	secretariat@wacoal.co.th

2.4 In the event that a Director or a member of the Management is involved in any suspected illegal or improper activities or has played of part in any acts of corruption, the complaint and information should be submitted directly to the Audit Committee.

2.5 In the event that the informant or complainant does not wish to reveal his/ her identity, then full detailed facts must be given or clear factual evidence that will sufficiently point to the probable cause of an illegal or improper acts that are not in accordance with the established business ethics and good moral principles of the Company or acts of corruption have been undertaken by a Director, the Management, or employee of the Company.

As such, the Company will maintain all such information received in strict confidence, together with taking into consideration the safety of the informant/ whistle-blower/ complainant - unless it is obliged to disclose such information as specified by any applicable laws.

3. Definitions of 'involved persons'

3.1 Informant/ whistle-blower/ complainant means those who come across or is aware of or possesses clear evidence or has a bone fide probable cause to believe that the suspected wrongdoer has committed an illegal and improper act that is not in full accordance with the established business ethics and code of conduct for Company Directors, the Management and employees, or has played a part in a act of corruption - whether directly or indirectly.

3.2 The receiver of the information/ complaint means the Audit Committee, Director of the Human Resources and General Affairs Division, Director of the Internal Audit Office, Chairman of the Anti-Corruption Working Group, the Company Secretary, and the immediate Supervisor/ Superior of the informant or the Superior Officer at the next level above. All such persons have the responsibility to



review the exact nature and adequacy of the information together with factual evidence received, in order to proceed with an initial review of the facts.

3.3 The suspected wrongdoer means the person/ party within the Company or representing the Company, who is the subject of the complaint and suspected of having committed an illegal and improper act that is not in full accordance with the established business ethics and code of conduct for Company Directors, the Management and employees, or has played a part in a act of corruption - whether directly or indirectly.

In the event that the Investigation Committee finds other parties are also involved or have participated in or has supported the alleged illegal or improper activities, then such persons or parties will also be considered as being the supposed wrongdoers and subject of the complaints.

3.4 Provider of additional information means anyone within or outside the Company, who is asked to cooperate with the Investigation Committee and the associated process by providing additional information relevant to the complaint submitted.

4. Investigative or fact-finding procedures

The Company will undertake an investigation and fact-finding activities in a just, equitable and transparent manner; as well as will treat the suspected wrongdoer in both an equitable and just manner.

4.1 The receiver of the complaint/ information will forward the facts to the Chairman of the Anti-Corruption Working Group for considering the appropriate actions to be taken.

4.2 If it is a general matter, the meeting of the Anti-Corruption Committee will appoint an Investigation Committee with not more than 5 members, comprising of representatives from the Internal Audit Office, Human Resources and General Affairs Division, Legal Department or the involved division of the Company.

If it is an urgent matter or a matter expected to cause potential damages for the Company or a potential loss of business amounting to more than Baht 1 million, or will have an impact on the overall image and reputation of the Company, then the Chairman of the Anti-Corruption Working Group will report the matter to the Managing Director, who will then appoint an Investigation Committee

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with not more than 7 members, consisting of representatives from the Internal Audit Office, Human Resources and General Affairs Division, Accounting and Finance Division, Legal Department or the involved division of the Company. Further, the Investigation Committee is able to invite any Directors, the Management and employee of the Company together with any business partners or any Stakeholders involved with the business of the Company to come meet with the Committee and to provide additional information, or to request for additional documented information to be given to the Committee.

As such, the members of the appointed Investigation Committee must not be involved in any way or have any vested personal interest with the matter or issue being investigated; whereby the investigation and fact-finding activities must be completed with 45 days from the date of the information/complaint being received from the informant or whistler-blower. However, if the fact-finding cannot be completed within this deadline, then a report is to be made to the Managing Director so as to request for an extension of an additional 30 days for the investigation and fact-finding process.

4.3 The Investigation Committee will then report the results and findings to the Anti-Corruption Working Group, for submitting a report to the Managing Director. As such, if the findings indicate the complaint to be true, then the Investigation Committee is also required to propose the appropriate punishment and disciplinary actions to be taken or the means to provide relief to those who has suffered any loss or damage as appropriate and just, through considering both these aspects jointly together with the Anti-Corruption Working Group.

4.4 The Managing Director will approve the punishment or disciplinary action or the means of providing relief to the party who has suffered any loss or damages as considered just and appropriate, together with undertaking the following associated actions :

- If it is an urgent issue or a matter with potential damages for the Company or a potential loss of business amounting to more than Baht 1 million, or will have an impact on the overall image and reputation of the Company, then the Managing Director is required to report the matter to the Board of Directors immediately.

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- If it is a general matter, the Managing Director will report it to the Audit Committee and the Corporate Governance and Sustainable Development Committee for acknowledgement, and then to report the summary of the opinions of the Audit Committee and the Corporate Governance and Sustainable Development Committee to the Board of Directors for acknowledgement at the next scheduled Board Meeting.

4.5 In the event that the suspected wrongdoer is a Director or an Executive Director, the receiver of the information/ complaint will report the incident and information to the Chairman of Board of Directors or the Chairman of the Audit Committee who will appoint an Investigation Committee. The Investigation Committee will then report the results and findings to the Chairman of Board of Directors or the Chairman of the Audit directly.

4.6 In the event that the informant/ whistle-blower/ complainant reveals his/ her identity, the result of the investigation will be given to him/ her in writing.

5. Protecting the whistle-blower/ informant/ complainant

The Company will, protect the rights of the bone fide informant/ whistler-blower/ complainant; whereby this will be in accordance with the established procedures and measures specified in the code of conduct for Company Directors, the Management and employees.

5.1 The informant/ whistle-blower/ complainant can choose whether, or not, to reveal his/ her Identity, if revealing the identity will make the person feel insecure and unsafe, or will subject the person to any loss or damage. As such, if the person chooses to reveal his/ her identity, it will better enable Company to feedback any progress relating to the information given and to disclose the true facts or provide some relief for any loss or damages suffered in a more effective and convenient manner.

5.2 The Company will keep confidential the name or any other personal information that will facilitate the exact identification of the whistle-blower/ informant/ complainant; whereby the receiver of the information as well as the person(s) handling the investigation will maintain absolute confidentiality of the information and relevant data - unless required to disclose such information as specified by any applicable laws.



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5.3 The Company will prevent and ensure that the informant/ whistle-blower/ complainant is not threatened or his/ her rights are not violated during the investigative process, as well as will punish anyone who threatens or violates the rights of the informant/ whistle-blower/ complaint.

5.4 The Company will undertake extra special protective measures corresponding to the potential degree of danger for the informant/ whistle-blower/ complaint.

5.5 In the event that the investigative process is completed, and there is no evidence of the any actual wrongdoing as informed, the Company will not punish or discipline the informant/ whistle-blower/ complaint if the information was given in a genuinely honest manner or intent. And, if anyone has suffered any loss or damage as a result of the information received, then he/ she will also be compensated and given any relief for the loss or damage suffered as appropriate and in an equitable manner.

5.6 The Company will not demote, punish, or subject any person to any negative actions against them, in the event that any employee or employee is a bone fide informant, whistle-blower or complainant, or anyone who cooperates in any associated investigation process, or refuses to pay bribes even if such refusal may result in the company losing business.

5.7 However, in the event that it is clearly evident to sufficiently indicate that the information or complaint received from the whistle-blower is made with a dishonest or malicious intent, so as to result in damages for the suspected wrongdoer or the Company, then the Company will investigate and, if so, impose disciplinary punishment in accordance with the regulations and/or also take legal proceedings against the informant or complainant who is an employee of the Company. If the informant is an external person/ party, then the Company will consider taking legal proceedings in accordance with the applicable laws.

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SECTION 6

Punishment and Penalties

1. The Company will punish and penalized Directors, the Management and employees who are in breach of these regulations, or who threaten or violate any other persons, or who fail to take any actions against any acts of non-compliance by others, or who breach or do not comply with the established anti-corruption policy. The penalties will be considered based on seriousness of guilt from written warning to dismissal, including out of duty and receiving any applicable civil or criminal prosecution in accordance with the established laws.

2. In the event that a business partner or any Stakeholder of the Company does not comply with these established regulations and policy on anti-corruption - either in the capacity as a wrongdoer or in neglecting to take any actions against any acts of non-compliance by others, or in giving false information, then the Company may consider terminating any existing business contracts or relationships with such parties.

SECTION 7

Other

Being or claiming to be unaware of the Anti-Corruption Policy and associated regulations on compliance with this policy as well as any associated laws and regulations is not accepted as an excuse for non-compliance.

This Regulations on Compliance with the Policy on Anti-Corruption is approved by The Board of Directors' meeting no.5/2022 on July 27, 2022, and shall take effect from August 1, 2022 onwards.

(Mr. Manu Leelanuwatana)

Chairman