



Anti-Corruption Policy and Measures

Supalai Public Company Limited and Subsidiaries



Message from the Chairman on Anti-Corruption Measures

Supalai Public Company Limited recognizes that corruption is a social threat that undermines the sustainability of the organization as well as the economy, society, politics, and international confidence. For this reason, the Company signed a declaration of intent to join the Collective Action Coalition (CAC) of the Thai private sector against corruption and has been a certified member of the CAC since 2021. Throughout this period, the Company has remained committed to instilling awareness among all employees and management at every level regarding the detrimental effects of corruption. The Company also fosters proper values to promote organizational transparency, while strengthening trust in business operations among organizations, investors, financial institutions, and business partners. Furthermore, to reinforce its firm commitment to conducting business with integrity and good corporate governance, the Company has encouraged its SME business partners to sign the CAC Declaration of Intent. As a result, the Company has been honored with the CAC Change Agent Award for four consecutive terms. This recognition serves as a valuable opportunity to enhance and sustain the Company's competitiveness in both the short and long term—enabling the Company to grow sustainably alongside its business partners.

Accordingly, the Board of Directors has assigned the Audit Committee to oversee the implementation of the Company's anti-corruption measures. Responsible parties have been designated to establish criteria, procedures, risk assessments, and preventive measures, as well as to ensure that the internal control system corresponds with the risks identified in the risk assessment.

The Company ensures proper monitoring and written reporting, with transparent disclosure and verification throughout all processes, to maintain adequacy and effectiveness in mitigating potential corruption risks. This also includes verifying the implementation of the Due Diligence process for new business partners as follows:

- New business partners of the Company must sign the "Supalai Business Partner Code of Conduct," which covers various issues such as business ethics, anti-bribery, and conflict of interest.
- New business partners of the Company must complete the "Sustainable Development Assessment for Business Partners and External Contractors of Supalai Public Company Limited" to assess ESG risks.
- New business partners of the Company must sign a Non-Disclosure Agreement (NDA) upon each engagement to safeguard the Company's internal information.

This anti-corruption policy requires all directors, executives, and employees of the Company, its subsidiaries, and any other companies under its control, as well as business representatives, to strictly adhere to the following policies:



The establishment of policies, measures, and internal control systems to prevent corruption will foster transparency and good corporate governance in a concrete and verifiable manner. The Company sincerely hopes that these approaches will deliver long-term benefits to all stakeholders, as follows:

- 1. Shareholders** Ensured that their investment generates worthwhile returns.
- 2. Employees** Provided with a positive work environment, opportunities for sustainable growth alongside the organization, and fair treatment in their duties, with channels to report any corruption to the independent directors committee.
- 3. Suppliers** Selected, engaged under contractual agreements, and evaluated fairly.
- 4. Customers** Receive quality products and excellent services.
- 5. Contractors** Provided with various facilitative services without any solicitation of fees, such as assistance with loan arrangements, timely payment transfers, work inspections, and the organization of material and equipment transportation in and out of construction sites.
- 6. Society and the Nation** The government receives accurate and full tax payments to manage national revenue, while society indirectly benefits from fostering a culture of integrity among the Company's employees, which extends its positive impact to the broader community.

Definitions

- Corruption** Corruption refers to any act aimed at obtaining benefits unlawfully for oneself or others. This includes, but is not limited to, embezzlement, accounting manipulation, money laundering, abuse of power, conflict of interest, and acts of corruption such as bribery in any form—whether by giving, offering/promising, receiving, or soliciting money, property, or other undue benefits. Such acts may involve public officials, private individuals, or relevant parties, directly or indirectly, including inducing them to neglect their duties, in order to secure or retain business or other improper commercial advantages for the Company. Exceptions apply only where such actions are permitted by law, regulations, announcements, rules, local customs, or trade practices.
- Facilitation Payment** Facilitation Payment refers to a small, unofficial payment made to a public official to ensure that the official carries out a process or to expedite its execution, without requiring the official's discretion. The process must be part of the official's legitimate duties and a right to which the legal entity is already entitled under the law.
- Company Personnel** Company Personnel refers to all directors, executives, and employees at every level of the Company, its subsidiaries, affiliated companies, and any other companies under its control, including business representatives.
- Related Parties of the Company** Related Parties of the Company refers to employees, representatives, or any individuals acting on behalf of the Company or its subsidiaries, whether or not they have formal authority to do so.

Anti-Corruption Policy

Supalai Public Company Limited conducts its business with a strategy of fair and transparent competition, prioritizing high-quality products and strictly complying with all applicable laws. The Company is firmly committed to anti-corruption, strictly prohibiting any form of corruption. This policy applies to all personnel at every level—including directors, executives, supervisors, and employees of the Company, its subsidiaries, affiliated companies, and any other companies under its control, as well as business representatives. It covers all relevant units and locations where the Company operates. All such personnel must not solicit, engage in, or accept any form of corruption for personal gain, or for the benefit of family, friends, or acquaintances. They are required to adhere strictly to the anti-corruption policy approved by the Board of Directors.

The Company has established a personnel management process, including recruitment, training, performance evaluation, compensation, and promotion, that supports the anti-corruption policy. The Company also communicates and raises awareness among all related parties to ensure that no one solicits, accepts, or agrees to accept money, goods, or any other benefits from parties engaged in business with the Company. Personnel must refrain from any actions that constitute corruption, and must not solicit, execute, or accept bribes for the benefit of the Company, themselves, family members, friends, or acquaintances. Directors, executives, supervisors, and employees who fail to comply with this policy will be subject to disciplinary action, with the method determined based on the facts and surrounding circumstances. At the same time, the Company does not have a policy of demotion, punishment, or negative consequences for employees who refuse to engage in corruption, even if such refusal results in lost business opportunities for the Company.

In addition, the Company regularly conducts corruption risk assessments for each process, identifies appropriate corrective measures, and establishes channels for reporting tips or complaints to the Company's Independent Committee in the event of suspected corruption or misconduct by any individual.

Scope of the Policy and Measures

This policy and its measures apply to Company personnel and related parties of the Company.

Scope and Responsibilities

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| Board of Directors | Approves the anti-corruption policy and oversees the implementation of systems that support effective anti-corruption measures, ensuring that management is aware of, prioritizes, and embeds an anti-corruption culture throughout the organization. |
| Audit Committee | Oversees the Company's internal control measures annually, including the preparation and review of policies and operational procedures to support the anti-corruption policy. The Audit Committee supervises compliance with anti-corruption measures, assesses risks, provides recommendations, and reports audit results on anti-corruption measures promptly and regularly to the Board of Directors. |
| Executive Committee and Management Committee | Establishes systems to promote and support the anti-corruption policy, ensuring communication to all employees and relevant parties. They also review the appropriateness of systems and measures to align with risks, business changes, disciplinary actions under company regulations, and legal requirements. |
| Corporate Governance Department: | Consists of two units |
| 1. Internal Audit Department | <ul style="list-style-type: none">▪ Reviews and verifies that operations comply with policies, procedures, authority, regulations, laws, and requirements of regulatory agencies. It also monitors performance to ensure that internal controls—including operational control, control environment, financial control, and segregation of duties—are |

appropriate, robust, and sufficient to address potential corruption risks. Audit results are reported promptly to the Audit Committee and subsequently to the Board of Directors.

2. Corporate Governance Department

- Collaborates with the Internal Audit Department and other relevant departments within the Company involved in activities with potential corruption risks. Oversees the assessment of corruption-related risks, collects measures and risk control guidelines considered by the departments, and reviews these risks every three years.
- Reviews the Company's anti-corruption policies and measures and submits them to the Audit Committee for consideration.
- Raises awareness among employees through various communication channels, including email and the Company's intranet, in an easily understandable format to promote and support compliance with the anti-corruption policy.

Personnel of the Company, its subsidiaries, affiliated companies, any other companies under the Company's control, and business representatives

- Understand and strictly comply with the Company's communicated anti-corruption policies and measures, participate in training as required by the Company, and refrain from soliciting, engaging in, or accepting corruption for the benefit of themselves, their family, friends, or acquaintances.
- Report any observed or suspected corruption and cooperate fully in investigations of facts related to suspected corrupt activities.
- All Company personnel are prohibited from engaging in or accepting corruption in any form, directly or indirectly, covering all business operations in every country and all relevant units. Compliance with the anti-corruption policy must be regularly reviewed, along with operational guidelines and requirements, to ensure alignment with changes in business, regulations, rules, and legal requirements.

Policy on Political Contribution

Definitions

Political Contributions Refers to promoting and supporting political activities in accordance with democratic principles, limited to the political participation of directors, executives, and employees. The Company does not provide any political support, either directly or indirectly, whether financial or in-kind, to gain business advantages or secure contracts.

Other Forms of Political Contributions Covers the following topics:

1. Provision of goods or services.
2. Advertising, promoting, or supporting political parties.
3. Purchasing tickets for fundraising events organized by political parties.
4. Donating money to organizations closely associated with political parties.
5. Using Company-owned premises, including headquarters buildings and project sites.
6. Supporting lobbying or influence that is improper, unreasonable, or based on personal relationships or offering any form of reciprocal benefit.
7. Supervisors or employees at any level directing or persuading subordinates to participate in any political activities.

Political Participation Refers to providing opportunities for Company personnel, whether individuals or groups, to participate in any activity, directly or indirectly, by observing, thinking, or acting on matters affecting themselves or the community. Participation must be done in their own name, using their own resources, outside of Company working hours. Company authority, resources, funds, or name must not be used for fundraising or any political activities, in order to prevent any misunderstanding that the Company is involved with or supports any political party.

Objectives

1. To ensure that the Company has a system in place that **prevents any direct or indirect political support for improper purposes**, while encouraging Company personnel to engage in political participation in accordance with democratic principles and within the framework of the Company's **Policy on Political Support**
2. To ensure that the Company maintains **internal control systems and record-keeping**, establishing procedures for: 1) preventing political support activities, and 2) handling requests for political support.
3. To ensure that the Company supports its personnel in **exercising their political rights** as responsible citizens, allowing them to express, participate, or support political activities outside working hours using only their own resources.
4. To ensure that the Company has no policy for supervisors or employees at any level to direct or influence subordinates in any way that creates an atmosphere of conflict or disagreement within the Company

Procedures and Control Measures

1. Procedures to Prevent Political Support Activities

- 1.1 Communication to Raise Awareness and Understanding of the Company's Objectives

1.1.1 Disclose the "Policy on Political Support" to the public through the Company's website (www.supalai.com) and the Company's Form 56-1 One Report.

1.1.2 Publicize the "Policy on Political Support" by communicating it to directors, executives, and employees through the following channels:

- Send an electronic letter (email) to all employees
- Post on the Company's internal network (Intranet) under the Corporate Governance section with the heading "Anti-Corruption Measures."
- Display on notice boards at the headquarters, sales offices, and construction offices of horizontal and high-rise projects

1.2 Record-Keeping

Maintain documentation of "Requests for Political Support" to ensure compliance with internal control principles and the Company's anti-corruption measures.

1.3 Whistleblowing

Establish channels for reporting any acts that constitute political support, whether directly or indirectly, financially or in-kind, intended to gain business advantages or secure contracts. Reports can be made through the whistleblowing channels specified in the Whistleblowing or Complaint Policy.

2. Relevant Parties

2.1 Recipient refers to the department or individual receiving a request for political support.

2.2 Coordinator for Political Support Requests refers to the Company Secretary.

2.3 Internal Audit Department

2.4 Audit Committee

2.5 Board of Directors

3. Scope of Responsibilities

3.1 Recipient

- Prepare a written record of "Request for Political Support" (Form-Anti-Cor-01)

3.2 Coordinator for Political Support Requests

- Manage the "Request for Political Support" (Form-Anti-Cor-01) and coordinate with the political party to acknowledge the scope and objectives of the Policy on Political Support.

3.3 Internal Audit Department

- Report information on "Requests for Political Support" to the Audit Committee.
- Monitor implementation and corrective actions based on the Audit Committee's and Board of Directors' recommendations, and present for acknowledgment.

3.4 Audit Committee

- Review and ensure the Company has internal control measures in place and oversee compliance with anti-corruption measures.

3.5 Board of Directors

- Delegate authority and responsibility to management to implement measures related to anti-corruption and the Audit Committee's recommendations on anti-corruption compliance

4. Procedures

4.1 The Recipient shall immediately record the information in the "Request for Political Support" (Form-Anti-Cor-01) and submit it to the Coordinator for Political Support Requests (Company Secretary) within 2 business days from the date the request is received from the political party. The following details must be included:

- 1) Date of the request
- 2) Name of the individual / department / affiliation / political party
- 3) Address, phone number, and email for contact
- 4) Details of the political contribution request

4.2 Coordinator for Political Support Requests (Company Secretary)

4.2.1 Send a response letter to the individual/department/affiliation/political party within 7 business days from the date the document is received from the Recipient, stating that the Company apologizes for being unable to provide political support and affirms that it supports the participation of the Company’s directors, executives, and employees in political activities in accordance with democratic principles. A sample response letter is provided as a guideline.

Sample Response Letter to a Political Party

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| Date..... |
| To..... |
| <p>We acknowledge receipt of your request regarding..... (e.g., request for financial support for political activities) from Supalai Public Company Limited.</p> <p>The Company regrettably apologizes that we are unable to support the requested political activity in accordance with your objectives. However, the Company supports its directors, executives, and employees in participating in political activities and exercising their voting rights in accordance with democratic principles.</p> <p style="text-align: center;">Sincerely, Supalai Public Company Limited</p> |

A copy of the “Response Letter to the Political Party” under item 1 shall be submitted to the Internal Audit Department for acknowledgment on the same date the letter is sent.

4.2.2 Assign a document number and file the document in chronological order.

4.3 Internal Audit Department

- 4.3.1 Report the “Requests for Political Support” to the Audit Committee monthly (if any), so that the Audit Committee can present them to the Board of Directors for acknowledgment.
- 4.3.2 Follow up on corrective actions based on the recommendations of the Audit Committee and the Board of Directors and present the results for acknowledgment.
- 4.3.3 Notify the Company Secretary of the date and session of the Audit Committee meeting where the report under item 4.3.1 was presented, so that the Audit Committee is promptly informed.

4.4 Audit Committee

The Audit Committee shall provide comments on the report of Requests for Political Contribution to be presented to the Board of Directors.

4.5 Board of Directors

The Board of Directors shall review the report on Requests for Political Support and provide guidance for process improvements.

Policies on the offering or acceptance of gifts, assets and other benefits

Definitions

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| Gift | Refers to Items given on various occasions according to customs, traditions, or culture, or as a courtesy practiced in society. |
| Entertainment | Refers to Provision of food, beverages, or the organization of events and recreational activities, such as celebrations. |
| Asset | Refers to Objects, whether tangible or intangible, that have value and can be possessed. |
| Other Benefits | Refers to Anything that may affect directors, executives, and employees. |
| Stakeholders | Refers to Shareholders, customers, employees, business partners (creditors, contractors, vendors), competitors, and society. |

Objectives

To ensure that the Company's personnel do not solicit or accept gifts, assets, or other benefits from parties related to the Company's business, so as not to affect decision-making in the performance of their duties with bias, discomfort, or conflicts of interest.

Control Procedures and Measures

1. The Company hereby clarifies its policy promoted to all business-related parties regarding not soliciting or accepting gifts or other benefits from parties related to the Company, communicated via www.supalai.com.
 - 1.1 The Company does not have the authority to command or compel any business-related party in any way; the decision to give gifts, assets, or other benefits is at the sole discretion of each business-related party.
 - 1.2 The main reasons for the Company's campaign include:
 - 1.2.1 To prevent exploitation and additional costs for business-related parties in cases where they have no policy to provide gifts or other benefits, but the Company solicits or requests them.
 - 1.2.2 Inappropriate acceptance of gifts, assets, or other benefits may affect decision-making with bias, discomfort, or conflicts of interest, which the Company does not support.
 - 1.2.3 To prevent the formation of wrong practices or customs regarding the receipt of gifts, assets, or other benefits.
 - 1.2.4 To prevent fraud or illegal solicitation of gifts, assets, or other benefits, which could damage the Company's reputation.
2. In situations where refusal is not possible due to customs, traditions, culture, or social courtesy, the gift must not be cash or cash equivalents. The gift shall be submitted to the central office within 7 days from the date of receipt. Similarly, entertainment or hospitality received from others on such occasions must not influence business decisions, be conducted transparently in a public setting, and not involve excessive expenditure. The recipient must immediately notify their supervisor and be able to justify the reason for receiving the gift, asset, or other benefit.
3. The provision of gifts, assets, or other benefits must be reviewed and approved by the Gift Procurement Task Force and meet the following conditions:
 - 3.1 Given on behalf of the Company only.
 - 3.2 The gift must not cause damage to the Company's reputation.
 - 3.3 The gift must comply with customs, traditions, culture, or social etiquette, be intended for clients, business partners, contractors, or other business-related parties, and be verifiable.
 - 3.4 The gift should bear the Company's logo.
 - 3.5 Written approval must be obtained from the authorized executive for the gift's expenditure.
 - 3.6 The following types of gifts or benefits are considered inappropriate:
 - Gifts for personal use, excessively extravagant, or contrary to good morals.
 - Gifts given as bribes to obtain business or gain improper advantages
 - Excessive entertainment or hospitality in a business setting, or any indecent behavior.

Policy on Whistleblowing and Complaints

Definitions

Whistleblowing Refers to Providing information to the Company regarding actions reasonably believed to constitute misconduct or suspicious behavior, such as:

- ❖ Violations of the Company's Good Corporate Governance practices or Code of Conduct.
- ❖ Breaches of the Company's rules, regulations, or internal policies.
- ❖ Corruption or fraudulent acts, where observed actions raise suspicion and may cause harm to the Company.

Complaint Refers to providing information regarding unfair treatment in the course of working with the Company's personnel.

Objectives

1. To encourage executives and employees to conduct business properly, transparently, fairly, and in a verifiable manner, in line with the principles of good corporate governance and the Company's Code of Conduct. The Company expects everyone to report, in good faith, any actions that violate or are suspected to violate these principles. This allows the Company to take corrective measures, ensure proper, transparent, and fair practices, and comply with relevant laws, including securities and exchange regulations that protect bona fide whistleblowers—principles the Company follows in practice.
2. To ensure that supervisors and the Human Resources department oversee, guide, and monitor employees' behaviors and actions appropriately. Whistleblowers acting in good faith will be afforded protection.

Control Procedures and Measures

1. Cases for Reporting

- 1.1 Personnel or relevant parties may report a whistleblowing case or file a complaint when they suspect or observe any act that violates good practice in the following areas:
 - Violation of the principles and practices outlined in the Corporate Governance Policy.
 - Violation of company rules, regulations, or internal policies.
 - Experiencing unfair treatment in the workplace.
 - Acts of fraud or corruption
- 1.2 In cases where any act is found to be suspicious or causes damage to the Company.

2. Whistleblowing or Complaint Channels

Email: anti-corruption@supalai.com This is a secure and confidential channel, with access rights strictly limited to authorized persons only. Whistleblowers can be assured that they will not face any risks or adverse consequences as a result of their report. This channel may also be used for inquiries or for seeking advice and guidance regarding the Company's anti-corruption measures.

3. Conditions and Consideration of Whistleblowing or Complaints

- 3.1 The details of the whistleblowing or complaint must be factual, clear, and sufficient to enable further investigation and fact-finding.
- 3.2 Whistleblowers or complainants may choose to remain anonymous if they believe that disclosing their name, address, or contact number could compromise their safety or cause any harm. However, self-identification will facilitate progress reporting, requests for additional information, clarification of facts, or mitigation of damages more conveniently and promptly.
- 3.3 All information received shall be treated as confidential. The name of the whistleblower or complainant will not be disclosed to the public without their consent.
- 3.4 Whistleblowers or complainants, whether employees or external parties, shall be entitled to protection of their rights.

- 3.5 The timeframe for handling complaints shall depend on the complexity of the matter, the sufficiency of documents and evidence provided by the complainant, as well as the evidence and explanations from the respondent.
- 3.6 The complaint receiver and all persons involved in the fact-finding process must maintain confidentiality of all related information and disclose it only when necessary, taking into consideration the safety and potential harm to the complainant, witnesses, sources of information, or related parties.

4. Related Parties

- 4.1 Whistleblower refers to a person who provides information or files a complaint.
- 4.2 Coordinator or Person Responsible for Whistleblowing or Complaints refers to the person assigned by the Disciplinary Committee to receive cases, conduct investigations, gather facts, and compile the results of the review.
- 4.3 Complaint Supervisor refers to the direct supervisor of the person being complained against, or a higher-level supervisor within the department concerned.
- 4.4 Disciplinary Affairs Supervisor refers to the Human Resources Department.
- 4.5 Disciplinary Committee means the body responsible for conducting investigations and making determinations.

5. Procedures

5.1 Registration and Case Referral

- 5.1.1 The complaint coordinator shall register the complaint and set a date to update the complainant on the progress, as follows:
 - In cases that may severely affect the Company's reputation, action must be taken immediately.
 - In other cases, action must be taken as soon as possible.
 - General inquiries, such as questions regarding share prices or dividend payments, shall not be registered as complaints. Instead, such inquiries shall be referred directly to the responsible department for response.
- 5.1.2 The complaint coordinator shall record the following information provided by the complainant:
 - Name of the complainant (except in cases of anonymity)
 - Date of the complaint
 - Name of the person or description of the incident being reported
 - Other relevant information
- 5.1.3 Once a complaint has been registered, the confidentiality level shall be determined based on the content (except for general inquiries). The coordinator shall then proceed as follows:
 - Forward the matter to the Complaint Supervisor to investigate the facts and take necessary actions within their authority.
 - Send a copy of the case to the Complaint Supervisor and the Disciplinary Committee within three (3) business days, to allow for recommendations on disciplinary or other appropriate actions.

5.2 Fact-Finding and Directive Actions

- 5.2.1 The complaint supervisor shall conduct a fact-finding investigation as assigned by the Disciplinary Committee.
- 5.2.2 In cases where the complaint is made anonymously and insufficient additional information can be obtained, the Complaint Supervisor shall submit a report of the findings and opinions regarding the complaint to the Chief Executive Officer (CEO) and the Deputy Chief Executive Officer (Deputy CEO) through the line of command to seek appropriate guidance for further action. If the CEO and Deputy CEO consider that the matter cannot be further pursued, the case shall be closed, and the Complaint

Supervisor shall send a copy of the closure report to the Complaint Coordinator for acknowledgment and further reporting to the Audit Committee.

- 5.2.3 If, after the fact-finding process, the Complaint Supervisor concludes that the accused is not at fault, or that the matter resulted from a misunderstanding, or that appropriate advice has already been provided to the accused or relevant persons to ensure proper conduct or behavior — and it is deemed appropriate to close the case without disciplinary action, the Complaint Supervisor shall submit the case to the next higher-level supervisor for approval to close the case. A copy of the report shall be provided to the Complaint Coordinator to notify the complainant, and to report the case closure to the CEO, Deputy CEO, and the Audit Committee.

5.3 Investigation of Facts

- 5.3.1 The Disciplinary Committee shall convene a meeting to discuss and reach a resolution, which shall then be submitted to the Executive Director of the relevant business line within three (3) working days from the date of the committee's resolution.
- 5.3.2 Upon receiving the Executive Director's directive, the result shall be immediately communicated to the Complaint Supervisor for further implementation in accordance with the prescribed procedures.

5.4 Notification of Results and Corrective Actions

- 5.4.1 The Complaint Supervisor shall act in accordance with the directives of the Executive Director, provide appropriate recommendations for conduct and corrective actions, and inform the Complaint Coordinator of the implementation results.
- 5.4.2 The Complaint Coordinator shall notify the complainant of the outcome and record the results of the complaint-handling process. Such results shall be presented to the Audit Committee at the next scheduled meeting, approximately within 30 days.
- 5.4.3 The Complaint Coordinator shall follow up on any corrective actions (if applicable) and report the progress to the Chief Executive Officer and the Audit Committee at the next meeting, approximately within 30 days.

6. Measures for the Protection of Whistleblowers and Complainants

- 6.1 The Company shall maintain the confidentiality of information and the identities of whistleblowers, complainants, and accused persons.
- 6.2 The Company shall disclose information only as necessary, taking into consideration the safety and potential damage to the informant, the source of information, or any related parties.
- 6.3 Any person who suffers damage as a result of reporting or cooperating shall receive appropriate and fair remedies through suitable procedures.
- 6.4 If a complainant or any person cooperating in the fact-finding process believes that they may face danger, hardship, or harm, they may request the Company to implement appropriate protective measures. The Company may also initiate such protection measures on its own discretion, without a formal request, if it considers that the matter poses a potential risk of harm, danger, or unfair treatment.
- 6.5 The Company shall not engage in any unfair treatment against whistleblowers, complainants, or those cooperating in the investigation, whether by means of demotion, punishment, negative evaluation, reassignment, change of duties or workplace, suspension, intimidation, interference with work performance, termination, or any other act of unfair treatment — even if the disclosure or cooperation results in business loss to the Company.

7. Other Provisions

7.1 Complaints Made in Bad Faith or Through Improper Channels

If any report, complaint, statement, or information is proven to have been made in bad faith or through unauthorized channels, the employee involved shall be subject to disciplinary action. If the misconduct is committed by an external party and causes damage to the Company, the Company reserves the right to pursue legal action against such person.

7.2 Responsibility of Supervisors

In cases where a Complaint Supervisor neglects or fails to comply with this policy, the immediate superior of such person shall also be subject to disciplinary consideration.

Policy on the Giving or Receiving of Support

Definition

Giving or Receiving Support Refers to "Giving or Receiving Support" refers to the act of providing or accepting any benefit — whether monetary, in kind (such as goods), or in any other form — with the objective of promoting the Company's business, brand, or reputation.

Objective

1. To ensure that the Company's giving or receiving of support does not lead to channels for corruption.
2. To ensure that the giving or receiving of support is conducted transparently, is verifiable, and that sufficient and appropriate supporting documentation is maintained.
3. To ensure that the Company establishes a sound internal control system governing the disbursement of support funds — including the review and approval of expenditures by authorized personnel, reporting of results, follow-up actions, and presentation of information to the Management Committee.

Procedures and Control Measures

1. Criteria for Disbursement of Support Funds Support items must comply with the following criteria:

- 1.1 There must be sufficient evidence that the applicant for support genuinely carried out the activities under the said project, and that the activities were carried out to support the successful achievement of the project's objectives and genuinely benefit society.
- 1.2 It must be provable that the provision of support funds or any other benefit quantifiable in monetary terms (e.g., providing accommodation and meals, etc.) or the support itself is not linked to any reciprocal benefit for any individual or entity, with the exception of customary public acknowledgements such as displaying a logo or announcing the sponsor's name at the event or in related promotional materials.
- 1.3 The request for support fund disbursement must be within the Company's authorized scope of operation.
- 1.4 The request for support fund disbursement must not be divided into multiple requests to fall within the approved monetary limit.

2. Procedures for Requesting Support Fund Disbursement

- 2.1 **Requesting Unit:** The requesting unit shall prepare the support fund disbursement request in accordance with the Company's payment regulations.
- 2.2 **Accounting Department:** The Accounting Department is responsible for reviewing the support fund disbursement request by verifying that the request complies with the support fund disbursement criteria and for maintaining accounting records and records retention in accordance with accounting processes.

3. Follow-up on Support Fund Disbursement

The requesting unit is responsible for following up on the disbursement of support funds to submit documentation of the execution of the project for which the funds were disbursed.

- 3.1 The requesting unit shall follow up on the execution of the supported project, providing evidence of the activity execution, such as documents announcing the names of the funding providers, letters of recognition, photos of the project activities published in promotional media, etc., and submit them to the relevant units as follows: * Accounting Department: To

serve as evidence of the project's execution. * Internal Audit Unit and Advertising and Public Relations Department: To compile information for publication in the Annual Report and Corporate Social Responsibility Report.

3.2 **Accounting Department:** The Accounting Department is responsible for ensuring that the requesting unit submits the documentation of the project execution as requested for support fund disbursement and for maintaining data storage in accordance with accounting processes.

4. Reporting of Support Funds the Accounting Department shall report the results of the support fund project execution to the Management Committee.

Policy on Charity Donations

Definition

Donations Refers to Donation is defined as the giving of money, in-kind contributions, or any other items of value for public benefit or charitable purposes, with the assurance that the donation will not be used in return for any advantage or as a bribe.

Objective

1. To ensure that donations do not lead to channels for corruption.
2. To ensure that the donation process is conducted transparently, is verifiable, and that sufficient and appropriate supporting documentation is maintained.
3. The Company shall establish a sound internal control system to govern the disbursement of charitable donations, requiring a review of items, approval of items by authorized personnel, reporting of results, follow-up, and the presentation of information to the Management Committee.

Procedures and Control Measures

1. Criteria for Disbursement of Donations

All donation requests must meet the following criteria:

- 1.1 It must be verifiable that the charitable project or activity genuinely exists and serves the purpose of benefiting society.
- 1.2 It must be verifiable that the donation is not linked to any reciprocal benefit for any individual or organization, except for general customary public recognition, such as displaying a logo, announcing donor names at the event, or publication in promotional materials.
- 1.3 The donation request must fall within the Company's authorized scope of operation.
- 1.4 The donation request must not be split into multiple smaller requests to remain within approval limits.

2. Procedures for Requesting Donation Disbursement

2.1 Requesting Unit for Donations:

2.1.1 Verify the existence and legitimacy of the organization, institution, or agency requesting the donation, including confirmation that the charitable project or activity genuinely benefits society.

2.1.2 Prepare and submit the donation request in accordance with the Company's payment regulations.

2.2 Accounting Department: Responsible for reviewing the donation request to ensure compliance with the criteria, maintaining accounting records, and storing related documentation in accordance with accounting procedures.

3. Follow-up on Charitable Donations

The requesting unit for Donations is responsible for following up on the charitable donation to submit documentation of the charitable project's execution for which the funds were disbursed.

- 3.1 The requesting unit for donations shall follow up on the execution of the charitable project, providing evidence of the activity execution, such as documents announcing the names of donors, letters of recognition, photos of the donation published in promotional media, etc., and submit them to the relevant units as follows: * Accounting Department: To serve as evidence of the project's execution. * Internal Audit Unit and Advertising and Public Relations Department:

To compile information for publication in the Annual Report and Corporate Social Responsibility Report.

- 3.2 The Accounting Department is responsible for ensuring that the requesting unit submits the documentation of the charitable project's execution as requested for disbursement and for maintaining data storage in accordance with accounting processes.

4. Reporting of Charitable Donation Results

The Accounting Department shall report the results of the charitable donation project execution to the Management Committee.

Policy on Conflict of Interest

Definition

Conflict of Interest Refers to Situation/Action: The direct or indirect use of one's official position to seek benefits for oneself, relatives, or any other person.

Objective

To ensure that the Company's personnel perform their duties by prioritizing the Company's best interests under legal and ethical compliance, and must avoid any personal interests that could negatively affect the performance of their duties for the benefit of the Company, as follows:

1. Do not engage in any business that competes with, or is similar in nature to, the Company's operations.
2. Do not act as a partner, shareholder with decision-making power, or executive in any business that competes with, or is similar in nature to, the Company. If unavoidable, the employee must immediately report the matter to their supervisor.
3. If an employee becomes involved in any business or situation that may lead to a conflict of interest, they must immediately report it to their supervisor.
4. Do not seek personal benefit from information or opportunities obtained through one's position or duties.
5. Avoid involvement in activities that may create a conflict of interest with the Company or result in any form of financial obligation with the Company's business partners or employees.
6. Avoid undertaking outside employment that may interfere with the performance of one's duties.
7. Employees must not use the Company's assets, information, or position for personal gain or to compete with the Company.
8. All employees must disclose any conflict-of-interest situation upon commencing employment, review it annually, and update it whenever circumstances change in a way that may create a conflict of interest. If there is any doubt, the employee must immediately report the matter to their supervisor for joint consideration.
9. When an employee becomes aware of a business opportunity with the Company's resources, information, or position, they must first present it to the Company. Management will then decide whether the Company wishes to pursue the opportunity. If the Company declines, the employee may proceed under the specified terms and in compliance with the Company's Code of Conduct.

Procedures and Control Measures

1. The Company provides channels for employees to report conflicts of interest on an annual basis and has monitoring and inspection processes in place to ensure that no conflicts occur.
2. The Company communicates regularly with employees to raise awareness of the importance of avoiding personal interests that may impair their ability to perform their duties accurately, efficiently, and in the best interest of the Company.
Examples of potential conflicts include:
 - Personal interests that could affect the Company's decisions.
 - Transactions with the Company involving oneself or family members.
 - Personal relationships that may conflict with professional responsibilities.
 - Financial relationships with individuals or entities that may be in conflict with the Company.
 - Investments or involvement in business opportunities that the Company may also be pursuing, obtained through knowledge gained in one's position.
3. The Company reports to the Audit Committee to ensure strict adherence to the conflict-of-interest prevention policy.

Policy on the Employment of Government Employees

Definition

Government Personnel (or State Official) refers to A government official, employee, temporary worker, committee, or an individual working in an administrative agency, a dispute resolution committee, or a committee or person legally authorized to issue any rule, order, or resolution that affects an individual.

Objective

To ensure that the Company's selection of personnel who were former government employees adheres to the criteria set by the Company, preventing such hiring from being used to reciprocate for any benefits obtained, and to ensure transparent and verifiable disclosure of information.

Procedures and Control Measures

1. The Human Resources Department shall interview and verify the hiring of individuals who previously worked for government agencies concerning any agreements made with the government agency and adherence to the Company's stipulated conditions:

- The individual must not be a current or former government employee, unless they have ceased to be a government employee for at least 2 years prior to applying for and being accepted as an employee.

This is to ensure that the Company does not take any action that would cause the individual to violate an agreement that could result in subsequent legal action.

2. Any selected applicant who is a former government employee must disclose information and certify that the statements made under Clause 1 are true.

Channels for Complaints, Whistleblowing, Feedback Submission, as well as Answering Queries and Providing Advice

Contact can be made via email at anti-corruption@supalai.com

Punishment

The Company is committed to promoting transparency, integrity, and anti-corruption in all its forms, both direct and indirect, among its directors, executives, and employees at every level. To achieve this, the Company regularly communicates relevant policies and announcements to ensure clear understanding and effective implementation.

Therefore, all directors, executives, and employees must diligently perform their duties in accordance with the Company's anti-corruption policies and measures. Any failure or omission to comply shall be considered a disciplinary offense under the Company's regulations.

The Company has established a disciplinary process, with the most severe penalty being termination of employment when deemed necessary. Company personnel cannot claim ignorance or negligence as an excuse for non-compliance. Furthermore, if the act of corruption constitutes a legal offense, the Company reserves the right to pursue legal action against the offender.

Prateep Tangmatitham

(Dr. Prateep Tangmatitham)
Chairman of the Board of Directors

Download via: Intranet of the Company / Corporate Governance Department / anti-corruption