



บริษัท ที.กรุงไทยอุตสาหกรรม จำกัด (มหาชน)
T.KRUNGTHAI INDUSTRIES PUBLIC CO., LTD.

ANTI-CORRUPTION POLICY

T. Krungthai Industries Public Company Limited

Anti-Corruption Policy: Revision 3 - November 18, 2025

2

Message from the Chairman of the Board

T. Krungthai Industries Public Company Limited conducts business under good corporate governance, adhering to the principles of good governance, business ethics, with a sense of social and environmental responsibility toward all stakeholders, as well as emphasizing and being committed to combating corruption.

Throughout our business operations, the Board of Directors has prioritized corporate governance within an ethical and transparent management framework that can be audited, especially in processes related to or at risk of internal fraud within the company, including all forms of corruption, whether direct or indirect.

The primary cause of corruption is the lack of morality and ethics. The Board of Directors has therefore established an anti-corruption policy with the aim of communicating and campaigning for all employees in the organization and all stakeholders to understand the fight against corruption under the same policy and to be informed of the company's commitment to combating corruption.

Revision 3

November 18, 2025



(General Terdsak Marrome)

Chairman of the Board of Directors

T. Krungthai Industries Public Company Limited

Table of Contents

Declaration of Intent: Anti-Corruption Policy	4
Objectives of the Anti-Corruption Policy.....	4
Scope of Application	5
Definitions	5
Company's Anti-Corruption Principles	6
Corruption Risk Assessment.....	7
Responsibilities for the Anti-Corruption Policy	8
Guidelines for Practice and Prevention of Corruption.....	9
Forms of Corruption	10
Management of Business Partners and Third Parties	13
Guidelines on Gifts, Entertainment, and Other Benefits.....	14
Transparent Procurement	15
Dealing with Government Officials.....	16
Reporting Conflicts of Interest	16
Anti-Corruption Measures	17
Training and Policy Communication	18
Receiving Tips or Complaints about Corruption	18
Channels for Reporting Tips or Complaints about Corruption.....	19
Protection Measures and Confidentiality	19
Investigation Procedures and Penalties	20
Record Keeping and Evidence Storage	20
Responsible Parties for Evidence Management	21
Policy Review and Updates	21
Publication of the Anti-Corruption Policy	22
Appendix.....	23

Declaration of Intent: Anti-Corruption Policy

T. Krungthai Industries Public Company Limited is committed to combating all forms of corruption. Therefore, the company stipulates that directors, executives, employees, and all parties involved in the company's business operations shall not engage in offering, promising, soliciting, demanding, giving or accepting bribes, or any actions/behaviors indicating corruption, whether monetary or non-monetary, and whether direct or indirect.

Furthermore, the anti-corruption policy is part of business operations and is the responsibility of the Board of Directors, executives, and employees at all levels who must strictly adhere to this anti-corruption policy without exception, including compliance with all laws related to anti-corruption. The company shall not participate in corruption, either directly or indirectly. The company does not allow requesting or accepting money, objects, or any benefits from parties related to the company's business, and does not demand, carry out, or accept bribes for the benefit of the company, oneself, or related parties, as stipulated in the company's business ethics code and generally practiced.

Objectives of the Anti-Corruption Policy

T. Krungthai Industries Public Company Limited has prepared the "Anti-Corruption Policy" with the following objectives:

1. **To establish principles, standards, and practices for preventing and combating all forms of corruption**, both direct and indirect, including giving, receiving, demanding, accepting, or participating in behaviors indicating fraud.
2. **To create appropriate internal control systems and audit mechanisms covering** all business operations to prevent, detect, and effectively respond to risks related to corruption.
3. **To ensure that directors, executives, employees, and all related parties have knowledge, understanding, and comply with relevant laws and regulations**, such as the Organic Act on Prevention and Suppression of Corruption and international anti-bribery standards.
4. **To promote an organizational culture that adheres to transparency, honesty, and good corporate governance** as the foundation of business operations.
5. **To build confidence among stakeholders**, including shareholders, customers, business partners, government agencies, communities, and the public, that the company conducts business with transparency, accountability, and adherence to business ethics.
6. **To clearly define the roles, duties, and responsibilities of executives and employees** in preventing, controlling, avoiding, and reporting behaviors indicating fraud.

7. **To establish systematic, effective, and fair processes for reporting tips, investigations, and actions when corruption indicators are found.**
8. **To encourage business partners, agents, contractors, or service providers to comply with transparency and anti-corruption standards** to reduce mutual risks and conduct sustainable business together.
9. **To enable the company to comply with international anti-corruption standards**, such as ISO 37001 Anti-Bribery Management System guidelines and requirements from sustainability assessment agencies.

Scope of Application

The Anti-Corruption Policy applies to all directors, executives, officers, and employees of the company, including subsidiaries, associated companies, other companies under the company's control (if any), business agents, and persons involved in business operations, who must strictly comply with the anti-corruption policy.

Definitions

"Fraud" according to the Criminal Code Section 11 means "to seek undue benefits that should not be obtained legally for oneself or others."

"Malfeasance" according to the Organic Act on Prevention and Suppression of Corruption B.E. 2542, Section 4 means "performing or omitting to perform any act in a position, or omitting to perform any act in circumstances that may make others believe that one has a position or duty when one does not have such position or duty, or using authority in one's position, all for the purpose of seeking undue benefits that should not be obtained legally for oneself or others."

"Corruption" means bribery, using one's position, authority, and/or using information obtained from performing work duties for the company to perform any action that benefits oneself, associates, and/or others to obtain property or any improper benefits for oneself, both directly and indirectly, including any action that conflicts with the company's business ethics, except in cases where laws, regulations, rules, announcements, local customs, or commercial practices allow such actions.

Company's Anti-Corruption Principles

T. Krungthai Industries Public Company Limited is committed to conducting business with transparency, ethics, and in accordance with good corporate governance principles. The company therefore clearly declares its intent to combat all forms of corruption with the following principles:

1. Adhere to the principle of "No Give – No Take – No Support" for all forms of corruption

The company and personnel at all levels must not give, receive, demand, offer, accept, or support any bribery or inappropriate benefits, whether direct or indirect, monetary or non-monetary.

2. Strictly comply with relevant laws and standards

Personnel at all levels must be aware of and comply with laws, regulations, rules, and practice manuals related to anti-corruption, both domestically and internationally, including company-established practices.

3. Promote transparent, auditable, and accountable work

All operational steps must be auditable, with proper approvals, complete supporting evidence, and adequate internal control systems to prevent corruption risks.

4. Focus on building an organizational culture adhering to honesty and integrity

The company emphasizes instilling good attitudes and awareness of transparency and honesty in work among employees at all levels to become the organization's shared culture.

5. Prohibit using third parties as intermediaries in actions indicating fraud

The company stipulates screening of business partners, contractors, agents, or consultants to prevent using external parties as channels for bribes or hidden benefits.

6. Establish a safe, clear, and fair tip reporting system

The company provides channels for receiving complaints about corruption, strictly protecting whistleblowers, preventing retaliation, and guaranteeing information confidentiality.

7. Conduct fair and impartial investigation measures

When complaints are received, the company will conduct careful, transparent, and fair investigations for all parties, using information, evidence, and facts as the basis.

8. Enforce penalties seriously and without discrimination

If fraudulent behavior is found, the company will take disciplinary action according to company regulations, including possible legal proceedings, without exception, regardless of whether the perpetrator is a director, executive, or employee at any level.

9. Regularly review and update policies

The company is committed to developing anti-corruption policies and measures to be current and appropriate to business circumstances through continuous review, monitoring, and improvement.

10. Communicate and train employees at all levels to understand and comply

The company will communicate and provide training for personnel at all levels to understand the anti-corruption policy and be able to correctly implement it in daily work.

Corruption Risk Assessment

The company establishes systematic and continuous corruption risk assessment to ensure that the organization's core activities have adequate internal controls to prevent corruption in all forms, with the following criteria:

1. Objectives of Risk Assessment

- 1.1. Identify risks that may lead to internal corruption
- 1.2. Assess risk levels, severity, and potential impacts
- 1.3. Establish appropriate internal control measures
- 1.4. Prioritize risks and prepare risk management plans
- 1.5. Report results to the Audit Committee and Board of Directors

2. Assessment Frequency

- 2.1. Assess corruption risks at least once per year
- 2.2. Additional assessments when there are changes in structure, approval authority, work systems, or events that may lead to corruption

3. Risk Assessment Process

The company uses the following process:

3.1. Risk Identification

- Procurement work
- Sales and marketing work
- Disbursement and welfare work
- Government liaison work
- Asset control work, etc.

3.2. Risk Analysis

- Likelihood of corruption occurrence
- Impact on company, customers, business partners, reputation, and law
- Gaps not yet covered by internal control systems

3.3. Risk Evaluation

- Categorize as low/medium/high levels
- Identify responsible departments

3.4. Risk Treatment

- Segregation of duties
- Add approval levels
- Increase random inspections
- Establish monitoring systems

3.5. Monitoring & Reporting

- Anti-Corruption Committee monitors quarterly
- Report to Audit Committee at least once per year
- Maintain assessment records as documentation

Responsibilities for the Anti-Corruption Policy

Board of Directors

1. Consider and approve the Anti-Corruption Policy
2. Support all employees to understand and recognize the importance of combating corruption
3. In cases where management reports on corruption that affects the company, provide consultation and advice, consider penalties, and find solutions together with the Managing Director

Audit Committee

1. Consider the Anti-Corruption Policy from the Managing Director to ensure it is appropriate for the business, organizational culture, and company environment
2. Review and update the policy as necessary and present to the Board of Directors for approval
3. Establish guidelines and review internal control reports, including corruption risk assessment to minimize company risk

4. Receive corruption tips, investigate facts, and present to the Board of Directors for penalty consideration or problem resolution

Managing Director

1. Establish the Anti-Corruption Policy to present to the Audit Committee
2. Promote and support anti-corruption efforts, including personnel recruitment guidelines
3. Communicate the policy to all employees and related parties
4. Review the policy to align with business changes or legal requirements and present to the Audit Committee
5. Assist the Audit Committee in investigating corruption facts and may delegate work to the management team

Employees

1. Perform work considering company interests above personal interests and avoid conflicts of interest
2. Check if they have conflicts of interest; if found, should refrain from working and let others take responsibility
3. Do not ignore actions indicating fraud and immediately report to supervisors/responsible persons and cooperate in investigations

Internal Audit Department

1. Follow the internal audit plan and report on internal controls and corruption risk assessment to the Audit Committee
2. Perform duties as assigned by the Audit Committee regarding corruption investigations beyond the audit plan

Guidelines for Practice and Prevention of Corruption

1. Directors, Managing Director, executives, and employees at all levels must strictly comply with the Anti-Corruption Policy and business ethics, without being involved in corruption, whether directly or indirectly.
2. The Managing Director must recognize the importance of disseminating knowledge to create understanding in compliance with the Anti-Corruption Policy, as well as being a good role model in honesty, integrity, morality, ethics, and code of conduct.
3. Do not commit acts or exhibit behaviors showing bribery/corruption to stakeholders, both directly and indirectly, including using company assets to support politics, etc.

4. The company establishes an internal control system with a good control environment, giving employees good attitudes toward internal control, with risk assessment that may impact objectives, goals, or work success, with good monitoring and evaluation systems to ensure actual implementation and appropriate improvement for situations.
5. The company establishes an Anti-Corruption Committee to inspect and assess risks, make risk prevention plans, monitor implementation of risk prevention plans, review the Anti-Corruption Policy at least once per year, and summarize reports to the Audit Committee.
6. This Anti-Corruption Policy is considered part of the company's rules and regulations regarding work. The Board of Directors, Managing Director, executives, and employees at all levels must recognize and strictly comply. Violation or non-compliance is considered disciplinary misconduct, and the company may consider punishment according to regulations.
7. The company communicates policies and anti-corruption measures, including whistleblowing and complaint channels, through various methods such as orientation and the company website, etc., to create knowledge and understanding for employees of the company, subsidiaries, associated companies, companies under the company's control (if any), as well as business agents in implementing this policy.

Forms of Corruption

The company is committed to creating and maintaining an organizational culture based on the principle that behaviors/transactions with government and private agencies involving corruption in any form are unacceptable.

1. Political Support

Refers to providing financial support, assets, objects, other rights or benefits, providing use of premises to facilitate accommodation, reception venues, meeting places, or gathering places to political parties, politicians, or politically related persons, and/or participating in activities to support policies, improper actions, or any actions contrary to constitutional law that harm communities, society, or the country, including supporting social division, whether directly or indirectly or to benefit business. The company will not donate or provide support in these matters.

2. Charitable Donations

These are expenditures without tangible returns that may be used as excuses or channels for corruption. The company will support various charitable groups that are legal. Donations aim to benefit society, and to prevent charitable donations from having hidden purposes, the company establishes

policies and criteria for charitable donations. The review process for donations and control details are as follows:

2.1. Must prove that the charitable project actually exists and is being implemented to support the project's objectives and truly benefit society.

2.2. Must prove that the charitable donation is not related to any benefits or returns to any person or agency, except for customary recognition such as displaying company logos, announcing names at event venues, or in media for publicity, etc.

2.3. The Accounting and Finance Department reviews charitable donations, which must comply with the "Authority Manual."

3. Sponsorships

With objectives for business, brand, or company reputation. Such payments have risks because they are payments for services or benefits that are difficult to measure and monitor. Sponsorships may be linked to bribery. The company therefore establishes policies and criteria regarding sponsorships, sponsorship review processes, control details, and evaluations as follows:

3.1. Must prove that the sponsorship requester has actually conducted activities according to the project and is implementing to support the project's objectives and truly benefit society.

3.2. Must prove that sponsorships or other benefits can be calculated in monetary terms, such as providing accommodation and meal support, which are not related to any benefits or returns to any person or agency, except for customary business recognition.

3.3. The Accounting and Finance Department reviews sponsorships, which must comply with the "Authority Manual."

4. Gifts/Entertainment and Other Expenses

The company uses criteria according to accounting principles and control details according to the Business Ethics Manual regarding "Gifts and Business Entertainment," including considering values according to the "Authority Manual" and reviewed by the Accounting and Finance Department with transparency.

5. Procurement

Must be conducted according to procurement policy procedures stipulated in the "Business Ethics Manual" and inspected quarterly by internal auditors.

6. Conflicts of Interest

The company considers it an important policy not to allow directors, executives, and employees to use opportunities from being directors, executives, or company employees to seek personal benefits. Therefore, it establishes guidelines for directors, executives, and employees as follows:

6.1. Avoid transactions related to oneself that may cause conflicts of interest with the company.

6.2. In cases where such transactions are necessary for the company's benefit, conduct the transaction as if with external parties. Directors, executives, or employees with interests in that transaction must not participate in approval consideration.

6.3. In cases that qualify as connected transactions under Stock Exchange of Thailand announcements, must strictly comply with criteria, methods, and disclosure of connected transaction information for listed companies.

6.4. In cases where directors, executives, employees, or family members participate or are shareholders in activities competing with the company's business or any activities that may cause conflicts of interest with the company, must request written approval from the Chairman of the Executive Board.

6.5. In cases where directors, executives, or employees become directors, partners, or consultants in the company or other business organizations, holding such positions must not conflict with the company's interests and direct duties in the company.

7. Facilitation Payments

Refers to small amounts paid to government officials unofficially and only to ensure that government officials will proceed according to processes or to expedite processes, where such processes do not require the government official's discretion and are actions proper to the government official's duties, including rights that the legal entity should receive by law anyway, such as requesting permits, requesting certificates, and receiving public services, etc. The company has no policy to pay facilitation fees in any form, either directly or indirectly, and will not take any action and will not accept any action in exchange for facilitation in business operations.

8. Revolving Door Issues in Hiring Government Employees/Officials

This is when people from the government sector work in the private sector or private sector people work on policy in the government sector, creating corruption risks in terms of conflicts of interest for individuals playing roles in both organizations, causing government organization officials to perform supervisory duties impartially or private sector personnel trying to push government policies to benefit their organizations.

Management of Business Partners and Third Parties

The company emphasizes checking the transparency of business partners, agents, contractors, and consultants to prevent corruption risks that may arise from external parties, with the following guidelines:

1. Screening

- 1.1. Check history and credibility
- 1.2. Check company names/executives through public databases
- 1.3. Check involvement in fraud or criminal cases
- 1.4. Check financial status and work transparency

2. Supplier Risk Assessment

- 2.1. Type of work (e.g., material procurement, transportation, consulting)
- 2.2. Level of conflict of interest risk
- 2.3. Government contact
- 2.4. Decision-making authority with the company

3. Signing Acceptance of Anti-Corruption Terms

Business partners must sign at least one of the following documents:

- 3.1. Supplier Code of Conduct
- 3.2. Anti-Corruption Compliance Acknowledgement
- 3.3. Document confirming not to give bribes or benefits to company employees

4. Business Partner Monitoring and Evaluation

- 4.1. Annual evaluation for high-risk business partners
- 4.2. Random inspection of quotations, tax invoices, and contracts
- 4.3. Check compliance with gift and benefit terms

5. Suspension or Termination of Relationship

The company has the right to immediately suspend or terminate employment if:

- 5.1. Business partner is involved in bribery
- 5.2. Gives gifts to employees
- 5.3. Forges documents or submits non-transparent quotations
- 5.4. Refuses to comply with the Anti-Corruption Policy

Guidelines on Gifts, Entertainment, and Other Benefits

1. Strictly Prohibited Items

- Cash/checks/gift cards
- Special discounts not available to general customers
- Airline tickets, accommodation, or trips
- Benefits with hidden intentions

2. Gift Value Limits

- Can only receive gifts worth $\leq 2,000$ baht
- If expected value exceeds this, must report to supervisor and submit to company for consideration
- Prohibited to receive frequently from the same person in an inappropriate manner

3. Recording

- Must record in Gift Register/Gift Log
- Collected monthly by Accounting or Human Resources Department
- Inspected by Internal Audit Department quarterly

4. Giving Gifts to External Parties

- Must be approved by authorized persons according to the Authority Manual
- Must have necessary business purposes, such as New Year, customer visits
- Must not be during tender submission or contract negotiation periods

5. Business Entertainment

- Must have clear business reasons
- Expenses must be reasonable and approved
- Must have more than 1 meeting participant
- Must not intend to cause inappropriate decisions



Transparent Procurement

To ensure all procurement steps are transparent, fair, prevent conflicts of interest, and reduce risks of corruption or inappropriate actions, focusing on maximum organizational efficiency and building confidence among all stakeholders.

This policy applies to procurement of all types of goods or services within the organization, including selection and evaluation of domestic and international suppliers or service providers.

Main Guidelines

- Selection of suppliers or service providers must use clear and fair criteria, considering quality, price, delivery capability, and performance history
- Prohibited to receive or give gifts, benefits, or any compensation that may affect procurement decisions
- Must record and store procurement evidence at all steps completely for retrospective inspection
- Negotiation and contracting must be reviewed and approved by relevant departments according to established procedures

Approval Process

- Procurement/Procurement Department prepares procurement reports and proposals
- Senior management considers approval according to amount and procurement type
- Internal Audit Department inspects documents and evidence to confirm correctness and policy compliance

Review Frequency

- Review practices annually
- Immediate review when relevant laws, regulations, or conditions change

Responsible Parties

- Procurement/Procurement Department
- Internal Audit Department

Dealing with Government Officials

1. Important Prohibitions

- Prohibited to give gifts in all cases
- Prohibited to pay "facilitation fees"
- Prohibited to use intermediaries to negotiate with government in non-transparent manners

2. Guidelines When Meeting Government Officials

- Must have at least 1 meeting participant
- Record meeting reports, such as purpose, location, and participants
- Maintain as evidence according to company regulations

3. Receiving Benefit Requests from Government Officials

- Must refuse immediately
- Report to supervisor
- Notify Audit Committee or complaint channel

Reporting Conflicts of Interest

1. Personnel Must Report When:

- Having shares in business partner companies
- Relatives work in departments where one has approval authority
- Having side jobs related to company work
- Having other interests that may hinder neutrality

2. Reporting Frequency

- Annual reporting
- Immediate reporting when circumstances change

3. Document Preparation

- Use "Conflict of Interest Declaration Form (COI Form)"
- Maintained by Human Resources Department
- Inspected by Internal Audit Department

Anti-Corruption Measures

1. Company employees have the duty to comply with policies. The Board of Directors assigns management to communicate and implement anti-corruption measures.
2. Company employees who violate or fail to comply with corporate governance policies and good corporate governance principles and this policy are considered to have committed misconduct according to work-related regulations on personnel management for employees, who will be subject to disciplinary consideration according to established regulations, including possible legal penalties if the action also violates the law. However, the company will not demote, punish, or give negative consequences to those who refuse corruption, even if such action causes the company to lose business opportunities.
3. The company establishes disbursement regulations by specifying amounts, approval authority, purposes, and recipients, which must have clear supporting documents to prevent fraud or corruption, along with inspection processes from the internal audit unit.
4. The company establishes processes to inspect sales and marketing work, including procurement and contracting regarding corruption risk regularly to comply with disbursement and procurement regulations. The internal audit unit will provide opinions and follow up on appropriate correction methods.
5. The company establishes personnel management processes that reflect the company's commitment to anti-corruption measures, from selection, training, performance evaluation, compensation, to promotion.
6. The company establishes internal audits to ensure that established internal control systems help the company achieve set goals, including inspecting all departments' operations to comply with requirements and regulations, and helping find deficiencies and weaknesses, including providing advice on developing work systems for efficiency and effectiveness according to good corporate governance guidelines.
7. The Internal Audit Department can urgently report issues found to the Audit Committee, which reports directly to the Board of Directors.

Training and Policy Communication

1. Training

- All new employees must attend mandatory training
- All employees must attend annual training
- Special training for "high-risk positions" such as Procurement, Sales

2. Testing

- After training, must pass comprehension assessment tests
- Summarize test results and report to Audit Committee

3. Policy Communication

- Publish on website
- Post announcements in prominent work areas
- Send annual publicity emails
- Include in employee handbook

Receiving Tips or Complaints about Corruption

1. Witnessing corruption actions/behaviors related to the organization directly or indirectly, such as witnessing organizational personnel bribing or receiving bribes from duties with government or private agencies
2. Witnessing actions that violate company procedures or affect the company's internal control system to the point of suspicion that it may be a channel for corruption
3. Witnessing actions that cause the company to lose benefits and affect the company's reputation
4. Witnessing actions that are not transparent, illegal, immoral, against local customs, and business ethics

Channels for Reporting Tips or Complaints about Corruption

The Board of Directors has assigned the Audit Committee to consider receiving tips, complaints, or actions that may raise suspicions of corruption occurring to the company, whether directly or indirectly, through receiving channels stipulated in the company's Anti-Corruption Policy.

Complainants must specify details of tips or complaints with name, address, and contactable phone number, and send to the following channels:

1. Report directly to Audit Committee (Independent Directors): independent@krungthai.com
2. Report through the Anti-Corruption Committee
3. Send letter to Independent Director or Audit Committee:

T. Krungthai Industries Public Company Limited

No. 23 Soi Chan 43 Yaek 21, Thung Wat Don, Sathon, Bangkok 10120

If whistleblowers or complainants have complaints about the Managing Director or executives, please send complaints directly to the Audit Committee.

Persons who can report tips or complaints about corruption are all stakeholder groups of the company, including shareholders, customers, competitors, creditors, government, communities, society, company executives and employees. Regardless of the method you report, the company will maintain your confidentiality.

Protection Measures and Confidentiality

To protect the rights of complainants and informants who act in good faith, the company will conceal names, addresses, or any information that can identify complainants or informants, and maintain confidentiality of complainant and informant information, limited only to those responsible for investigating complaints who can access such information.

In cases of complaints about the Managing Director, the Audit Committee will protect whistleblowers, complainants, witnesses, and persons providing information in fact-finding investigations from affecting duties/positions and from receiving distress, danger, or injustice arising from reporting tips, complaints, being witnesses, or providing information, even though the company may lose business opportunities.

The Managing Director has the duty to use discretion to issue orders as deemed appropriate to protect whistleblowers, complainants, witnesses, and persons providing information in fact-finding investigations from distress, danger, or injustice arising from reporting tips, complaints, being witnesses, or providing information.

The Managing Director may delegate work to any executive to act in using discretion to protect the safety of whistleblowers, complainants, witnesses, and informants. The delegated executive must not be involved in the reported matter, either directly or indirectly (e.g., the accused is the direct supervisor of the delegated executive).

Those who receive information from performing duties related to complaints have the duty to maintain confidentiality of information, complaints, and evidence of complainants and informants. Disclosure to others without relevant duties is prohibited, except disclosure required by law.

Investigation Procedures and Penalties

1. Upon receiving tips, the Managing Director and Audit Committee will screen and immediately investigate facts.
2. During fact-finding investigations, the Managing Director and Audit Committee may delegate representatives (executives) to periodically inform whistleblowers or complainants of progress.
3. If fact-finding investigations reveal that available information or evidence reasonably suggests the accused actually committed fraud, the company will inform the accused of charges and give the accused the right to prove themselves by finding additional information or evidence showing they were not involved in the fraudulent actions alleged.
4. If the accused committed fraud, such fraud is considered violation of the Anti-Corruption Policy and the company's business ethics code, and will be subject to disciplinary consideration according to company-established regulations. If the fraudulent action violates the law, the perpetrator may also be subject to legal penalties. Disciplinary penalties according to company regulations are final decisions by the Managing Director.

In cases of complaints about the Managing Director, the Audit Committee will receive matters, gather information, and investigate facts as reported to present to the Board of Directors for joint consideration and determination of appropriate penalties.

Record Keeping and Evidence Storage

The company establishes systematic, transparent, and auditable storage, recording, and maintenance of documents and evidence related to good corporate governance, anti-corruption, and internal control systems for use as evidence in internal and external audits.

Responsible Parties for Evidence Management

1. Human Resources Department (HR Department)

Responsible for storing employee-related documents such as:

- Conflict of Interest Declaration Forms (COI)
- Employee training records
- Employee policy acknowledgment records

2. Procurement Department / Related Departments

Responsible for storing business partner-related documents such as:

- Business partner Due Diligence documents
- Supplier selection and evaluation documents

3. Internal Audit Department

Responsible for storing and controlling governance documents such as:

- Gift Log
- Annual risk assessment reports
- Complaint reports and investigation results

Policy Review and Updates

To ensure that all organizational policies remain accurate, comprehensive, and consistent with current laws, regulations, and business environments, and to prevent risks arising from outdated or inappropriate policies.

This policy covers all organizational policies and applies to all policy-responsible parties.

Main Guidelines

- Review policies at least once per year to assess appropriateness and completeness
- Immediate review when laws, regulations change, or when deficiencies/problems in implementation are found
- Policy Owner prepares draft policy updates and collects opinions from relevant departments
- Legal Department checks legal and regulatory correctness
- Senior management approves final draft before announcing new or updated policies for employee acknowledgment

Review Frequency

- Once per year
- Immediate review when laws, regulations change, or problems in implementation are found

Responsible Parties

- Policy Owner
- Legal Department

Approval Process

1. Policy Owner prepares draft policy updates
2. Relevant departments provide opinions and revise drafts
3. Senior management approves final draft
4. Announce new or updated policies for employee acknowledgment

Publication of the Anti-Corruption Policy

To ensure everyone in the organization and stakeholders are aware of the Anti-Corruption Policy, the company will:

1. The company will post the anti-corruption policy announcement in prominent locations where everyone in the organization can read it.
2. The company publishes the Anti-Corruption Policy through public communication channels on the website: [www.tkrungthai.com\Investor Relations\Good Corporate Governance](http://www.tkrungthai.com/Investor%20Relations/Good%20Corporate%20Governance)
3. The company provides orientation training on the Anti-Corruption Policy.

Appendix

Summary Table of Additions for New Policy

No.	Category	New Version Additions
1	Objectives	Added 9 items: establish principles and standards, create internal control systems, promote knowledge and understanding, build organizational culture, define roles and duties, support business partner compliance, comply with ISO 37001 standards, etc. (Pages 4) 5
2	Anti-Corruption Principles	Added 10 items: adhere to "No Give-No Take-No Support" principle, comply with laws and standards, promote transparency, build organizational culture, prohibit using third parties as intermediaries, establish tip reporting systems, conduct fair investigations, enforce serious penalties, review and update policies, communicate and train (Pages 6)
3	Corruption Risk Assessment	Added 5-step process: 1) Identify risk areas 2) Analyze risks 3) Evaluate risk levels 4) Create control measures 5) Monitor and report results. Set frequency at once per year (Pages 7)
4	Business Partner/Third Party Management	Added steps: Screening, Supplier Risk Assessment, sign acceptance of terms (Supplier Code of Conduct), monitor and evaluate, suspend or terminate relationships (Pages 13)
5	Gifts/Entertainment/Benefits	Added terms: prohibited items, gift value limit ≤ 2,000 baht, record in Gift Register/Log, guidelines for giving gifts to external parties, business entertainment conditions (Pages 14)
6	Procurement	Specify main guidelines, approval process, review frequency (Pages 15)
7	Dealing with Government Officials	Specify important prohibitions, guidelines when meeting government officials, receiving benefit requests (Page 16)
8	Conflict of Interest Reporting (COI)	Conditions requiring reporting, annual frequency, COI Form preparation (Pages 16)
9	Training and Policy Communication	Training for new and existing employees, comprehension assessment testing, communication channels (Page 18)
10	Record Keeping/Evidence Storage	Specify documents to maintain, storage period ≥ 5 years (Page 19)
11	Policy Review/Updates	Review objectives, annual frequency, approval process (Pages 21)