

Anti-Corruption Policy

Document No : PB-COM-019

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ThaiNamthip Corporation Public Company Limited (“TNCC”) and its subsidiaries (“**ThaiNamthip Group**”) are committed to conducting business with ethics, integrity, transparency, and accountability, strictly adhering to regulations, rules, and laws. The ThaiNamthip Group is dedicated to combating corruption in all forms by promoting ethical business practices and upholding responsibilities to society and stakeholders.

To foster a culture of anti-corruption, TNCC has established this Anti-Corruption Policy, which aims to ensure that personnel within the ThaiNamthip Group, as well as individuals involved in TNCC's business operations, understand their roles, duties, and responsibilities. This policy serves as a guideline for setting standards and practices to prevent corruption in business activities and to develop a sustainable organization. Furthermore, the ThaiNamthip Group has clearly defined penalties for violations of this policy. The ThaiNamthip Group does not tolerate any form of corruption and has a policy of not penalizing or taking negative actions against personnel who refuse to engage in corrupt practices, even if such refusal may result in lost business opportunities for the ThaiNamthip Group.

1. Definition

Corruption refers to the misuse of power or the improper use of assets to obtain benefits that are not rightfully due to oneself or others, either directly or indirectly. This can lead to harm to the interests of others or create unfairness and damage to business, the economy, society, and the nation as a whole. Forms of corruption include, but are not limited to, the acceptance or payment of bribes, valuable items, gifts or other benefits, conflicts of interest, fraud, money laundering, embezzlement, concealment of facts, obstruction of justice, political favors, charitable donations, sponsorships, gifts, hospitality expenses, and other expenses. It also encompasses offering, contracting, promising, soliciting, or receiving money, property, or any other improper benefits to public officials, government agencies, private entities, or other responsible individuals, whether directly or indirectly, to induce them to perform or refrain from performing their duties. This is intended to acquire or retain business or to promote business specifically for the ThaiNamthip Group, or to obtain or maintain any other improper business advantages, unless such actions are permitted by law, regulations, announcements, rules, customs, or acceptable trade practices.

2. Principles

- 2.1 Directors, executives, and employees at all levels of the ThaiNamthip Group must not solicit or engage in any actions that would involve giving, receiving, or accepting corruption in any form, whether directly or indirectly. This prohibition applies to benefits for the organization, themselves, their families, friends, acquaintances, or for business advantages, encompassing both domestic and international businesses, as well as all related entities within the ThaiNamthip Group.
- 2.2 Business operations and procurement processes must be conducted transparently, honestly, and in accordance with applicable laws.

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- 2.3 The ThaiNamthip Group must establish regular reviews of compliance with this Anti-Corruption Policy, as well as revise operational practices and requirements to align with changes in business, regulations, and legal requirements. Any violations involving acts of corruption, or supporting, assisting, or cooperating with corrupt activities will be subject to disciplinary action according to the ThaiNamthip Group's regulations.
- 2.4 TNCC will communicate the principles of good corporate governance and business practices, along with the Anti-Corruption Policy, including channels for reporting wrongdoing or complaints, to the public, subsidiaries, joint ventures, other companies under TNCC's control, and all stakeholder groups through various channels, such as the TNCC website, annual report filings (Form 56-1 One Report), and letters to stakeholders. This is to ensure awareness and to implement measures.

3. Responsibilities

- 3.1. The Board of Directors is responsible for establishing and approving the Anti-Corruption Policy by creating a system that supports effective anti-corruption efforts. This ensures that personnel at all levels within the ThaiNamthip Group are aware of the importance of combating corruption and integrating it into the corporate culture. The Board also provides guidance, monitors compliance with the Anti-Corruption Policy, and organizes training and orientation sessions for directors, executives, or new employees regarding the policy to ensure understanding and adherence.
- 3.2. The Audit and Risk Committee is responsible for reviewing the accounting system, financial reporting, internal control systems, and risk management of the ThaiNamthip Group to ensure they are adequate and compliant with the Anti-Corruption Policy, relevant regulations, and laws.
- 3.3. Management is responsible for implementing the Anti-Corruption Policy by establishing systems that promote, support, supervise, and communicate the policy to employees of the ThaiNamthip Group. This is to ensure that all employees and relevant parties comply with the Anti-Corruption Policy. Management must also review the appropriateness of the systems and measures to align with changes in business, regulations, and legal requirements.
- 3.4. The Internal Audit Department is responsible for auditing and monitoring operational compliance with policies, practices, procedures, and relevant laws to ensure that the ThaiNamthip Group has an appropriate and adequate internal control system to prevent potential corruption risks. Additionally, it is responsible for conducting risk assessments related to corruption and reporting findings to the Audit and Risk Committee.
- 3.5. Directors, executives, and employees at all levels of the ThaiNamthip Group must comply with the Anti-Corruption Policy by refraining from involvement in any corrupt activities, whether directly or indirectly.

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4. Practices

4.1. Anti-Bribery and Anti-Corruption

The ThaiNamthip Group conducts its business dealings with stakeholders in a manner that is lawful, straightforward, transparent, honest, auditable, and free from corruption. This includes adhering to relevant laws and TNCC's Anti-Corruption Policy, ensuring that no actions lead to disputes or damage the reputation of the ThaiNamthip Group. The following practices must be observed:

- (1) Do not make promises or engage in bribery or corruption to obtain or provide inappropriate business benefits or influence unfair business decisions.
- (2) Do not offer or provide gifts or benefits to government officials to facilitate actions or expedite processes or services, which would constitute an abuse of authority.
- (3) Avoid and do not support business dealings or transactions with individuals or entities involved in corruption or exhibiting corrupt behavior.
- (4) Exercise caution when engaging in transactions with individuals, legal entities, or organizations suspected of corruption. Special care should be taken in high-risk operational processes, such as sales and marketing, procurement, contracting, investment projects, offering and receiving gifts, hospitality events, and donations or sponsorships.

4.2. Gifts and Entertainment

Receiving or giving various benefits, including assets, services, facilitation, or entertainment to business associates, must comply with local customs and laws. These benefits should be of appropriate value and should not create undue influence on decision-making. The guidelines are as follows:

- (1) Do not demand or request any benefits from business associates of ThaiNamthip Group, which includes customers, partners, government officials, or stakeholders related to ThaiNamthip Group.
- (2) Before receiving or giving gifts, entertainment, or any benefits to business associates, ensure that they are of appropriate value for each occasion. These actions should be transparent, verifiable, and compliant with applicable laws, TNCC regulations, or local customs that permit such actions.
- (3) Do not accept or give assets, services, or entertainment that may create influence or motivation for improper decision-making or actions.
- (4) Keep evidence of expenditures that demonstrate the value of the assets, services, or

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entertainment to ensure they can be verified.

- (5) In cases where authorized by a supervisor to assist external entities, acceptance of assets, services, or entertainment is allowed based on the criteria or standards set by the external organization.
- (6) Exercise caution when giving assets, services, or entertainment to supervisors or internal entities, as well as when receiving them from subordinates. Such transactions must not create undue influence on decision-making.

4.3. **Political Neutrality**

ThaiNamthip Group, including its directors, executives, and employees, must conduct business activities with political neutrality, refraining from political bias and not supporting politicians as follows:

- (1) Do not provide assistance or political support to any political party, political coalition groups, political authorities, or political candidates at the local, regional, or national levels, or to any particular political force in the name of ThaiNamthip Group. Additionally, do not participate in any activities that could give the impression that the organization is involved or supportive.
- (2) If directors, executives, or employees of ThaiNamthip Group wish to participate in activities under their personal rights and freedoms, they must not misrepresent themselves as personnel or representatives of ThaiNamthip Group. They must also refrain from engaging in political activities of personal interest using the assets, resources, or work time of ThaiNamthip Group.
- (3) ThaiNamthip Group supports the exercise of political rights as good citizens under the Constitution and relevant laws.

4.4. **Charitable Donations and Financial Support**

ThaiNamthip Group's operations, conducted with social responsibility and community engagement, can take various forms, including education development, quality of life improvement, and support for religion and cultural arts. TNCC must ensure that such social operations are carried out transparently and do not violate morals, laws, relevant regulations, or cause harm to society. The guidelines are as follows:

- (1) Charitable donations and financial support from ThaiNamthip Group must follow a transparent consideration process, aligning with the objectives or policies of ThaiNamthip Group. There should be procedures for monitoring and ensuring that charitable donations and financial support are not used as an excuse for bribery and corruption, do not create conflicts of interest, and have no connections with any

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political parties, political forces, or individual politicians.

- (2) Donations for charitable purposes must be carefully considered to ensure that the organization or entity receiving the donation has a genuine purpose for benefiting society and is not involved in illegal activities. Additionally, it should align with the regulations, policies, and business practices of ThaiNamthip Group.

5. Channels for Reporting and Protection for Whistleblowers

Personnel of the ThaiNamthip Group must not neglect or ignore any actions that may violate the Anti-Corruption Policy. TNCC has established channels for reporting suspicions and protecting whistleblowers in accordance with the ThaiNamthip Group's Whistleblowing Policy, with the following details:

5.1 By Phone: 1800018247

5.2 Through the Website: [EthicsPoint - Swire Coca-Cola](#)

The Anti-Corruption Policy has been endorsed by the resolution of the Audit and Risk Committee Meeting No. 2/2025 on 25 February 2025 and has been approved by the resolution of the Board of Directors Meeting No. 2/2025 on 26 February 2025 and take effect on 3 March 2025. In this regard, the Audit and Risk Committee shall review the appropriateness of this Information and Disclosure Policy when deemed necessary or at least once (1) a year, and propose amendments as necessary or appropriate for the consideration and approval of the Board of Directors.