

## Anti-Corruption Policy

The MBK GROUP (the "Group") conducts business under the good corporate governance principle and in compliance with the law, business ethics, and the Group's code of conduct. It is also strongly committed to countering corruption and intolerant to all forms of corruption. The company, therefore, has formulated an anti-corruption policy to provide guidelines for directors, executives, and employees at all levels and raise their awareness. With these guidelines, they will perform duties by upholding the integrity and avoiding corruption or wrongful exploitation of duties to obtain benefits. These critical factors help maintain the Group's reputation and support business operations.

### 1. Definition

<b>Group</b>	MBK Plc. and affiliates/subsidiaries with regulatory power
<b>Company</b>	MBK Plc.
<b>Corruption</b>	Any unlawful seeking of benefits for oneself or others, leading to abuse of power by misappropriating, soliciting, receiving, promising, or sponsoring money, properties, or any other benefits, whether directly or indirectly, in exchange for persons, government officials, or employees in private agencies to perform or neglect their duties, or in order to influence their decisions and obtain benefits that are improper or against laws, regulations, corporate governance policy, ethics, and the Group's code of conduct.
<b>Employees</b>	The Group's employees, including full-time employees, probationary employees, and temporary employees, whom the Company agrees to hire with compensation

### 2. Scope of policy

This anti-corruption policy is a guideline for MBK Plc. and its subsidiaries/affiliates with regulatory power.

### 3. Duties and responsibilities

<b>The Board</b>	Establishes policies and institutes an effective system to support anti-corruption efforts and ensure the executives recognize the importance of this matter and it is put to practice as corporate culture
<b>Audit Committee</b>	Supervises and reviews the internal control related to anti-corruption measures.



## Executives

Define a process to promote, support, and communicate anti-corruption policies to all employees. Another responsibility is to conduct a corruption risk assessment and ensure the continuous implementation of anti-corruption policies throughout the organization. They also review different measures if they are appropriate and in line with business changes, rules, regulations, and laws.

## 4. Practice guideline

4.1 It is prohibited to commit or involve directly and indirectly in engaging any forms of corruption to obtain the benefits of oneself, the Group, or those related to oneself, such as family, friends, or acquaintances.

4.2 It is prohibited to accept or offer gifts, properties, or other benefits or serve as an intermediary in providing benefits to those involved in the business or government agencies. The offering or acceptance of gifts, properties, or other benefits or payment of hospitality expenses should comply with the Group's regulations or be made for business or traditional purposes only. The action shall not affect the employees' decisions in performing their duties.

4.3 Charitable contributions and sponsorship shall be made in good faith, appropriately, and transparently based on the level of approval authority. The valid documents shall be provided as evidence.

4.4 All employees shall conduct business in a politically neutral manner. It is prohibited to provide financial support or other supports for politicians or political parties to gain a business advantage or benefits, leading to loss of neutrality. The directors, executives, or employees have political rights and liberties under the law. However, they must be aware that they shall not act or conduct any activities, including using any resources of the Group, to gain political benefits, which may misrepresent the Group as a politically partial company.

4.5 Sufficiently and appropriately institute internal control systems to prevent the employees from violating the internal and external policies, laws, and regulations. Also, provide accurate and transparent financial reports and corruption-related risk to executives

4.6 Set up a procurement audit process to review the work regularly and define clear steps and levels of procurement approving authority to ensure accuracy and transparency.

4.7 The anti-corruption policy shall cover human resource management, starting from recruitment, promotion, training, to performance evaluation.

4.8 Regularly review and audit the employees' compliance with anti-corruption policy to be aligned with business changes, regulations, and legal requirements.

4.9 Organize training programs and communicate the anti-corruption policy to the directors, executives, and employees to ensure that they perform their duties with integrity and accountability. They will then turn the implementation into the corporate culture.



4.10 Communicate the anti-corruption policy to the Group, business partners, and stakeholders, including the public, through various communication channels to ensure they are aware and put it into practice.

4.11 The executives are responsible for ensuring that all employees comply with the anti-corruption policy.

4.12 When witnessing corruption acts related to the group, the witness shall not neglect or ignore it. He or she shall notify the supervisor or the person in charge, including cooperating with those involved in the investigation process.

4.13 In compliance with the regulations stipulated by the Group, the company shall take disciplinary action against those who commit corruption. The corrupters may be legally penalized if their wrongdoing is against the law.

4.14 The Group opens secure channels for whistleblowers. It also provides justice and protection for the whistleblowers or those who refuse to take part in corruption.

If feeling uncertain whether the operations have complied with the anti-corruption policy or not, the employees should inform the supervisors or the Corporate Governance Department. With facts or information received, the authorized parties will jointly deliberate the factors and ensure proper implementation.

The directors, executives, and employees of MBK Plc. and subsidiaries/affiliates that have regulatory power shall strictly comply with the anti-corruption policy.

