

Regulation**No. 001****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. Therefore, the BOD Order No. 008/2564 Re: Anti-Corruption Policy dated 7th April 2021 has been considered and deemed appropriate for cancellation, and this regulation shall be enforced until otherwise changed as per the following details.

1. Objective

This anti-corruption policy is a guideline for directors, executives, and employees at all levels of MBK GROUP to understand and comply with, while assuming their responsibilities with honesty and without corruption or personal benefits. This is a crucial element of maintaining the company's reputation and supporting all business operations.

2. Definition

- 2.1 The Group means MBK Public Company Limited and its subsidiaries / associates with a controlling power
- 2.2 Company means MBK Plc.
- 2.3 Corruption means 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.



3. Scope of policy

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

4. Rules or code of conduct

For the clear code of conduct of the Group's anti-corruption policy, determined operations are conducted as follows:

4.1 Duties and responsibilities

- 4.1.1 The Board 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.
- 4.1.2 Audit Committee Supervises and reviews the internal control related to anti-corruption measures.
- 4.1.3 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.

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

4.2 Guidelines on operations

- 4.2.1 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.
- 4.2.2 For giving and receiving gifts, the Company does not permit giving or receiving gifts, properties, or other benefits or serving as an intermediary in providing benefits to those involved in the business or government agencies. The giving or receiving gifts, properties, or other benefits or payment of hospitality expenses have to

- 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.
- 4.2.3 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.
- 4.2.4 For the facilitation payment, the Company does not make facilitation payments to government officials in any case which is a risk leading to bribery or corruption.
- 4.2.5 For the employment or the appointment of government officials, the Company neither employ nor appoint the government officials to hold positions of directors, consultants, executives, and employees of the Company— which take the risk of causing corruption. In case that the Company employs or appoints the government officials, anti-corruption measures associated with Human Resources are followed.
- 4.2.6 For conflict of interest, the Company does not take any action which causes conflict of interest and is a risk leading to corruption. The Company has to comply with regulations prescribed by the Stock Exchange of Thailand.
- 4.2.7 All employees shall conduct business in a politically neutral manner. The Company does not permit providing 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.
- 4.2.8 To sufficiently and appropriately institute internal control systems to prevent the employees from violating the internal and external policies, laws, and regulations. Also, to provide accurate and transparent financial reports and corruption-related risk to executives.
- 4.2.9 To set up a procurement audit process to review the work regularly and to define clear steps and levels of procurement approving authority to ensure accuracy and transparency.
- 4.2.10 The anti-corruption policy shall cover human resource management, starting from recruitment, promotion, training, to performance evaluation.

- 4.2.11 To regularly review and to audit the employees' compliance with anti-corruption policy to be aligned with business changes, regulations, and legal requirements.
- 4.2.12 To organize training programs and to 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.
- 4.2.13 To 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.
- 4.2.14 The executives are responsible for ensuring that all employees comply with the anti-corruption policy.
- 4.2.15 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.
- 4.2.16 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.
- 4.2.17 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.
- 4.2.18 If feeling uncertain whether the operations have complied with the anti-corruption policy or not, the employees should inform the supervisors or the Compliance Department. With facts or information received, the authorized parties will jointly deliberate the factors and ensure proper implementation.

5. Exception to code of conduct

- No -

6. Penalty clause

The Company is committed to promote and instill transparency, honesty, and anti-corruption behaviors in all forms, both directly and indirectly, at all levels of employment, from directors, managers, and other employees. The Company will also communicate and publicize this set of

the anti-corruption policy and measures to directors, managers and employees of all levels, as well as to the public. In addition, the Company will promote and develop true understanding of the policy for effective compliance.

Therefore, any ignorance and violation of this policy will be considered wrongful and a violation of the Company's rules, thus will be considered for disciplinary punishment. Not knowing of this policy is not considered an excusable reason for any violation. In the cases where corruption is illegal, the Company has the rights to pursue a lawsuit against the violators.

Effective from 15th October 2021 onwards.

(Banterng Tantivit)

Chairman