

Anti-Corruption Policy

KCG Corporation Public Company Limited

KCG Corporation Public Company Limited and its subsidiaries ("Company") have a clear policy for all forms of anti-corruption, whether it is the misuse of authority, the improper use of assets for personal gain, or causing harm to the interests of others, including giving and accepting bribes both in monetary and material forms, as well as conflict of interests, fraud, money laundering, embezzlement, concealing facts, and obstructing justice.

1. Principles and Reasons

The Company and its subsidiaries conduct business with transparency and recognize the importance of anti-corruption in all forms by operating the business in accordance with the law for the benefit of society, as well as encouraging employees to perform their duties with integrity and to be good citizens.

2. Objectives

The Company has formulated an anti-corruption policy with the following objectives:

2.1 To establish a written policy to ensure that directors, executives, and employees are aware of the intentions and framework of the anti-corruption policy.

2.2 To serve as a guideline for directors, executives, and employees to have a sense of responsibility and recognize the importance of collaboration within the framework of the anti-corruption policy.

2.3 To provide assurance to stakeholders that the Company is committed to conducting its business in accordance with the anti-corruption policy.

3. Anti-Corruption Policy

In order to ensure compliance with the guidelines set forth in the good corporate governance policy, the Company has implemented the anti-corruption policy through a risk management process, policy establishment, and promotion of corporate culture. This is done to ensure that employees, executives, and stakeholders are informed and implement the policy effectively.

3.1 Definitions

"**Corruption**" is defined as the misuse of authority and responsibility in order to obtain benefits or property in an improper manner for the benefit of one's self or another or to damage the benefits of others. Corruption can take the form of bribery involving the exchange of goods, money, or other benefits, fraud, money laundering, embezzlement, concealing facts, obstructing justice, and abusing one's position of authority to intimidate or solicit business decisions or benefits from others. This includes both the relationships between the private sector and government agencies, as well as the relationships within the private sector.

"**Bribery**" refers to the act of providing or offering money, assets, or other benefits to induce a person to perform or omit an action, or to neglect their duties in order to obtain or maintain an unfair advantage that is against the law, unethical, and could harm the Company's reputation.

"Charitable Donations" refers to activities involving expenditures without the expectation of tangible returns.

"Political Support" refers to the act of providing support for political activities on behalf of a company, whether in the form of financial support or other forms. Providing loans is an example of financial support. Other forms of support include providing goods or services, advertising, promoting, or supporting political parties, purchasing tickets for fundraising events, and organizations associated with political parties. However, it should be noted that such support is only permitted when it is consistent with the democratic process as defined by the law.

"Sponsorships" refers to money paid for services or benefits that are difficult to measure and track, and may be indirectly related to bribery. Sponsorship differs from charitable donations in that it serves to promote the business activities of a company.

"Government Officials" refer to individuals designated by law to be responsible for preventing and combating corruption. This includes government officials, government employees, state enterprise employees, contractors, representatives, or any other individuals acting on behalf of the following entities:

- Ministries, departments, or government agencies
- International organizations
- Political parties, politicians, or candidates for election, local government officials
- Regulatory agencies
- State enterprises

"Company Employee" refers to the Board of Directors, subcommittees, executives, and employees at all levels.

3.2 Anti-Corruption

3.2.1 Company employees at all levels are prohibited from engaging in any form of corruption, whether directly or indirectly. This includes accepting bribes and seeking undue benefits in various forms, such as receiving or offering assets or other benefits to government officials or any other individuals who conduct business with the Company, for personal gain, for others, or to create business opportunities for the Company.

3.2.2 The Company has a policy to comply with the laws and relevant standards regarding the prevention of corruption in Thailand and in every country where the Company's representatives conduct business on behalf of the Company.

- 3.2.3 This policy applies to representatives, contracting parties, or any individuals who act on behalf of the Company.
- 3.2.4 The Company employee who violates or fails to comply with this policy, whether directly or indirectly, will be subject to disciplinary action in accordance with the Company's Articles of Association or may face legal consequences. Therefore, Company employees need to have a thorough understanding and adhere to the anti-corruption policy at every stage of operating procedures. If any actions violating this policy are observed, they shall be immediately reported to the supervisor or the responsible department/personnel.
- 3.2.5 If a supervisor neglects or fails to enforce compliance with this policy on subordinates or is aware of such actions but fails to address or report them, they will be subject to disciplinary action as specified in the Company's Articles of Association.
- 3.2.6 The Company shall regularly monitor compliance with this anti-corruption policy and review the guidelines and requirements for operations to align with changes in the business, regulations, and legal requirements.

3.3 Responsibilities

- 3.3.1 The Board has duties and responsibilities to establish policies and provide an effective anti-corruption system to ensure that the Management is aware of the importance of combating corruption and fosters a culture where these values are embedded as corporate culture.
- 3.3.2 The Audit Committee is responsible for reviewing the financial and accounting reporting system, the internal control system, the internal audit system, and the risk management system. The Audit Committee also reviews the operational practices to ensure compliance with the anti-corruption policy, regulations, and relevant laws.
- 3.3.3 The Management has the responsibility and accountability to establish systems for promoting and supporting the anti-corruption policy as well as to communicate them to all levels of personnel. The Management is also responsible for reviewing, examining, and amending systems and measures to align with various changes, and managing the ongoing assessment of the corruption risks in order to identify high-risk situations and find appropriate methods for prevention and correction.
- 3.3.4 The Internal Auditor is responsible for auditing and reviewing operations to ensure compliance with policies, best practices, approval authorities, regulations, and laws in order to ensure that the Company has an efficient control system that prevents corruption risk. The Internal Auditor shall report to the Audit Committee.
- 3.3.5 Employees have a duty to comply with the anti-corruption policy and shall not engage in any form of corruption, whether directly or indirectly.

3.4 Scope and Practice Guidelines

The Company assigns personnel at all levels to carry out duties with vigilance in order to prevent corruption in all forms, as follows:

3.4.1 Giving and Receiving Bribes

It is strictly prohibited to give or receive bribes in any form, in exchange for any kind of benefit. Furthermore, it is forbidden to authorize or allow others to give or receive bribes on one's behalf.

3.4.2 Giving or Receiving Gifts, Entertainment, and Hospitality

(1) The Company recognizes the importance of fostering good relationships with business partners. Therefore, any transparent and legitimate actions that are part of normal business operations and comply with laws, regulations, local customs, or trade practices are allowed. For example, providing entertainment, hosting a reception, and giving or receiving gifts on special occasions, as long as they are done reasonably and in accordance with the code of business conduct

(2) Providing entertainment, hosting a reception, and giving or receiving gifts on special occasions is not prohibited if the following requirements are met:

(a.) It is not made with the intention of influencing improper actions or has an impact on business decisions or results in unfair benefits.

(b.) It does not violate this policy, the Company's policies, the ethical guidelines for conducting business, or any relevant laws.

(c.) It is given in the Company's name, not an individual's name.

(d.) It is done in accordance with appropriate customs and traditions associated with the occasion, such as exchanging gifts during various festivals.

(e.) It is given or received openly, not secretly.

(f.) Hosting a reception as necessary without extravagance or excessive frequency.

3.4.3 Political Support

(a.) The Company conducts business in a politically neutral manner. There is no policy to provide political support or to act in favor of any political party, whether directly or indirectly.

(b.) Company employees have the freedom to exercise their political rights, such as voting in elections or engaging in public referendums. However, company employees shall not use the Company's assets, resources, or working hours. Furthermore, Company employees must not provide services on behalf of the Company or use the Company's name to support any political activities or engage

in any actions that may create the perception of the Company's involvement or support for any particular party.

3.4.4 Charitable Donations and Sponsorships

(a.) Donations and sponsorships can only be made in accordance with the Company's policies and guidelines, without seeking any personal benefits or expecting returns from the recipients of the donations or financial support.

(b.) Company employees shall exercise caution to ensure that charitable donations and sponsorships are not used as a means to conceal bribery. Charitable donations and sponsorships should go through a transparent evaluation process and comply with relevant laws and regulations. A written request, stating the purpose of the donation or sponsorship, along with supporting documents, should be submitted to the authorized approver at each level.

- 3.5 The Company is committed to creating and maintaining a corporate culture that firmly rejects corruption as an acceptable practice, both in dealings with the government and the private sector.
- 3.6 Company employees at all levels must not fail to report when they come across actions that fall under corruption related to the Company. Company employees are required to report such incidents to the designated individuals responsible and cooperate in investigating the facts, in accordance with the Company's whistleblowing policy
- 3.7 The Company shall ensure fairness and protect employees who reject corruption. This includes not giving demotions, penalizing them, or providing negative consequences to the said employee, even if their actions result in the Company losing business opportunities.
- 3.8 Directors and executives at all levels shall demonstrate honesty and serve as role models in adhering to the anti-corruption policy. The Company designates the company secretary to be responsible for disseminating knowledge, creating understanding, and promoting a rigorous and continuous commitment to the anti-corruption policy among all employees. This effort aims to integrate the policy into the corporate culture.
- 3.9 This anti-corruption policy applies to the process of human resources management, including personnel selection and recruitment, promotions, training, and performance evaluations. It is specified that supervisors at all levels should communicate and ensure understanding among employees to be used in business activities that fall under their responsibility and require effective implementation and control in accordance with the policy.
- 3.10 The Company will implement the anti-corruption policy in accordance with the corporate governance policy, sustainable development policy, and code of business conduct. This

includes adherence to relevant regulations, guidelines, and the Company's handbook as well as additional guidelines and practices in the future.

- 3.11 The Company promotes the anti-corruption policy through both internal and external media channels. This includes announcements on the Company's website and disclosed in the Annual Report. The Company's policy is implemented in accordance with the laws of Thailand regarding anti-corruption.

4. Whistleblowing Channels

- 4.1 The whistleblowing channels are provided as follows:

Contact the Audit Committee and the Chairman of the Audit Committee via email

Contact: the Audit Committee or Chairman of the Audit Committee

Email: whistleblower@kcgcorporation.com

or via registered mail

Contact: the Audit Committee or Chairman of the Audit Committee

Address: KCG Corporation Public Company Limited

3059 - 3059/1-3 Sukhumvit Road, Bangchak

Phra Khanong, Bangkok 10260

4.2 Record and Report

The Company assigns the secretary of the Audit Committee with the responsibility of keeping records of reports and complaints regarding fraud and corruption, as well as preparing a summary report of fraud and corruption records. All cases that have been investigated or are currently under investigation should be regularly reported to the Audit Committee, at least once every quarter. The Audit Committee should also submit a report on these matters to the Board for their acknowledgment.

4.3 Communication and Training

4.3.1 The Company shall ensure communication of the anti-corruption policy to all departments through various channels. This includes training on different forms of corruption, the risks of engaging in bribery and corruption, and how to report any suspicious activities in order to inform stakeholders and encourage them to adhere to the policy. Such training will be included as part of the Company's new employee orientation training.

4.3.2 If employees have any questions or concerns regarding this policy or any measures to combat corruption, they should inquire from the secretary of the Audit Committee.

4.4 Punishment

Any personnel of the Company who intentionally fails to comply with this policy, engages in behavior that intimidates, threatens, or discriminates against the individual reporting a complaint or disclosure, or any person involved in the complaint or disclosure process, shall be subject to disciplinary action and shall be held responsible for indemnification to the Company or any affected individuals. Additionally, they may face civil and criminal liability or other legal consequences as applicable.

4.5 Anti-Corruption Policy Review

The Company shall conduct a review of the anti-corruption policy at least once a year.

5. Enforcement

The anti-corruption policy shall take effect on the announcement date.

This was announced on November 1, 2022.

Dr. Chaiwat Wibulsawat

Chairman of the Board

KCG Corporation Public Company Limited