

Anti-Corruption Policy

KCG Corporation Public Company Limited

KCG Corporation Public Company Limited and its subsidiaries (“the Company”) are committed to conducting business with transparency, accountability, and strict compliance with the law. The Company explicitly declares its intention not to tolerate any form of corruption, whether it involves the misuse of entrusted power or Company assets for personal or others’ gain, or causing damage to the interests of others. This includes giving or receiving bribes in the form of money or anything of value, as well as conflicts of interest, fraud, money laundering, embezzlement, concealment of facts, obstruction of justice, or any dishonest misconduct.

This Policy is established to ensure that the Company complies with all applicable laws, rules, and relevant regulations concerning the prevention and suppression of all forms of corruption, whether direct or indirect, and covers all business activities and transactions in all countries and all related functions. All directors, executives, and employees of the Company must strictly adhere to this Policy without exception to ensure transparency in business operations.

1. Principles and Rationale

The “Company” is committed to conducting its business with transparency and recognizes the importance of preventing all forms of corruption. It upholds lawful and socially responsible operations and encourages employees to act with integrity and as responsible corporate citizens.

2. Objectives

This Anti-Corruption Policy is established with the following objectives:

2.1 To establish a written policy that informs directors, executives, and employees of the Company’s commitment and framework for anti-corruption.

2.2 To provide guidance that fosters awareness among directors, executives, and employees, and encourages their cooperation in adhering to 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. Definitions

“the Company” means KCG Corporation Public Company Limited, including its subsidiaries and affiliated companies.

“Subsidiaries or affiliated companies” means companies that have any of the following relationships:

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- **“Subsidiary”** means a company in which the business operator holds, directly or indirectly, more than 50 percent of the total issued shares, or has the power to control the company’s financial and operational policies, regardless of the proportion of shares held.
- **“Associated company”** means a company in which the Company holds, directly or indirectly, 20–50 percent of the total issued shares and has significant influence over its policy or operations without control.

“Company Personnel” means all directors, executives, employees, staff, and contract workers of the Company, including both permanent and temporary personnel.

“Corruption” means the misuse of authority or company assets to obtain undue benefits for oneself, others, the Company, or related parties, or to cause harm to the interests of others. This includes, but is not limited to, bribery, offering or receiving money, gifts, or other benefits, fraud, money laundering, embezzlement, manipulation of financial statements, concealment of facts, conflicts of interest, abuse of power to intimidate or solicit benefits, or influencing business decisions of others. Corruption encompasses relationships between private parties and government agencies, as well as between private parties themselves, except where permitted by applicable laws, regulations, announcements, rules, customs, or commercial practices.

“Bribery” means giving or offering money, property, or any other benefits to public officials—including foreign public officials and officials of international organizations—as well as officials of government agencies or private entities, in order to induce them to act, refrain from acting, or omit any action in the performance of their duties, for the purpose of obtaining or retaining undue advantages, in violation of laws, ethical standards, or in a manner that may harm the Company’s reputation.

“Gift” means any gift, souvenir, hospitality, or other benefit of monetary value, including assets, cash equivalents, or items that can be exchanged for goods or services.

“Giving of Gifts” means providing gifts, souvenirs, or other assets in accordance with local customs, traditions, or practices, including occasions for congratulation, expression of gratitude, condolence, or gestures intended to demonstrate goodwill and maintain positive relationships.

“Business Hospitality” means expenditures for business-related hospitality, including receptions, hosting, provision of food and beverages, sporting events, entertainment, recreational activities, seminars, site visits, or any other expenses directly related to business operations or customary commercial practices.

“Sponsorship” means funds provided to customers, business partners, associations, foundations, charitable organizations, or other entities for services or benefits that are difficult to measure or track, which could potentially be linked to bribery. The purpose of sponsorship is to promote the Company’s brand or reputation, enhance business credibility, and strengthen business relationships in an appropriate manner. Sponsorship differs from charitable donations as it serves as a means of promoting the Company’s business activities.

“Political Contributions” means any support provided in the name of the Company, whether financial or in other forms, to support political activities. Examples of financial support include loans, while examples of other forms of support include providing goods or services, advertising or promoting political parties, purchasing tickets for fundraising events, or donating to organizations closely associated with political parties. Political contributions do not include support for democratic processes permitted by applicable laws.

“Charitable Donations” means activities involving the voluntary use of the Company’s resources—such as time, money, assets, or personnel—without tangible return, provided to organizations or individuals to support charitable activities. Such donations must be for public benefit, lawful, and in accordance with customary practices, ensuring that donated funds or assets are not used as a pretext for bribery or other improper purposes.

“Conflict of Interest” means any action by an individual—including Company employees, politicians, government officials, or service recipients—where personal interests are so significant that they may influence the individual’s decisions or performance of duties in their position, and negatively affect the interests of the Company, organization, or the public.

“Kickback” means an amount of money that is negotiated to be deducted from payment for goods or services, or paid back to the recipient as a form of inducement or bribery.

“Facilitation Payment” means any unofficial payment, fee, or gift provided to a public official solely to ensure that routine governmental actions are performed, or to expedite such actions, where the process does not require the official’s discretion and the right to such action is already legally entitled to the entity, such as obtaining permits, certificates, or public services. The Company’s policy strictly prohibits the payment of facilitation payments or kickbacks to public officials, customers, vendors, or other business partners, whether directly or indirectly, in any form.

“Government Officials” means any official as defined under the laws related to the prevention and suppression of corruption, and includes government officials, public officers, state enterprise employees, contractors, agents, or any persons acting on behalf of the following entities:

- Government ministries, departments, agencies, or other state authorities;
- International organizations;
- Political parties, political office holders, election candidates, or local government executives;
- Regulatory authorities;
- State-owned enterprises.

“International Organization Official” means any individual working for an international organization or any person authorized by the international organization to act on its behalf.

“Business Partner” means any vendor, service provider, contractor, or supplier, whether a legal entity or an individual, who has a business relationship with the Company.

“Agent” means any individual or entity authorized under an agreement with a principal to act on the principal's behalf, with legal authority to perform specific actions. For example, the Company may appoint agents officially to develop retail markets.

“External Stakeholders” means any individual, group, or organization that can influence the Company's decision-making processes or affect the achievement of its objectives. This term also includes those who are impacted by the Company's decisions or have an interest in the Company's business operations.

4. Anti-Corruption Policy

To align with the principles set forth in the Company's Good Corporate Governance Policy, the Company has established an Anti-Corruption Policy. This policy is implemented through risk management processes, clear guidelines, and the promotion of an ethical organizational culture, to ensure that employees, executives, and relevant stakeholders are aware of, and effectively adhere to, the policy as follows:

- 4.1 All Company personnel at every level are strictly prohibited from engaging, directly or indirectly, in any form of corruption, bribery, or improper benefit-seeking. This includes soliciting, receiving, offering, or giving any asset or other benefit to public officials or any individuals conducting business with the Company for personal gain, for the benefit of family members or others, or to create business opportunities for the Company.
- 4.2 The Company is committed to complying with all applicable anti-corruption laws and standards in Thailand and in any country where the Company's representatives conduct business on its behalf.
- 4.3 Compliance with this policy extends to subsidiaries, associated companies, any other entities under the Company's control, as well as agents, contractors, or any individuals acting on behalf of the Company.
- 4.4 Company personnel are prohibited from embezzling, misappropriating, or using Company assets for personal purposes or inappropriately. Personnel must perform their duties with transparency, integrity, ethics, and in the best interests of the Company.
- 4.5 The Company does not permit false, misleading, incomplete, or inaccurate records, nor the manipulation of accounts or financial reports. Off-the-books accounts or records to support or conceal improper payments are strictly prohibited.
- 4.6 Any Company personnel who violate or fail to comply with this policy, whether directly or indirectly, will be subject to disciplinary action in accordance with Company regulations or applicable laws. Personnel are required to understand and adhere to the Anti-Corruption Policy in all aspects of their work. Any observed violations must be reported immediately to supervisors or the designated responsible unit/person.

- 4.7 Supervisors who ignore violations or non-compliance by their subordinates, or who become aware of such acts but fail to take corrective action or report the matter, will be subject to disciplinary action under Company regulations.
- 4.8 The Company shall review compliance with this Anti-Corruption Policy at least annually, including revising procedures and requirements as necessary to align with changes in business operations, regulations, and legal requirements.

5. Roles and Responsibilities

5.1 Board of Directors

The Company's Board of Directors is responsible for establishing policies, approving governance frameworks, ensuring adherence to policies, and supporting an effective anti-corruption system. The Board ensures that management recognizes the importance of anti-corruption and instills these values as part of the organizational culture.

5.2 Audit Committee

The Audit Committee is responsible for overseeing and reviewing financial reporting and accounting systems, internal controls, internal audit systems, and risk management frameworks. It also reviews compliance with the Anti-Corruption Policy, applicable regulations, and relevant laws; considers complaints or reports of suspected corruption; examines anti-corruption audit findings and preventive measures; and oversees whistleblowing and complaint reporting processes.

5.3 Corporate Governance and Sustainable Development Committee

This Committee is responsible for supervising, establishing, and monitoring the Company's corporate governance policies. It supports and monitors practices related to business ethics, anti-corruption, conflict of interest prevention, and effective governance systems. It regularly reports anti-corruption activities and measures to the Board of Directors.

5.4 Management

Management is responsible for implementing the policy, establishing effective mechanisms and controls to prevent corruption, promoting awareness among all personnel, and ensuring compliance with anti-corruption measures. Management also reviews and updates systems and measures in line with business changes, laws, regulations, and evaluates corruption risks to identify high-risk events and implement appropriate prevention and mitigation measures.

5.5 Internal Audit

Internal Audit is responsible for examining and reviewing operations to ensure compliance with the policy, procedures, authority, regulations, and relevant laws. It ensures that control systems are adequate to prevent corruption and reports audit results to the Audit Committee.

5.6 Human Resources

Human Resources is responsible for communicating the Anti-Corruption Policy and related measures, providing guidance and channels for reporting corruption, conducting background checks for key positions to ensure personnel integrity, and delivering training to employees to enhance their ability to prevent corruption in the workplace.

5.7 Company Personnel

All Company personnel are required to strictly comply with the Anti-Corruption Policy and must not engage, directly or indirectly, in any form of corruption.

6. Anti-Corruption Measures

To align with the Company's Anti-Corruption Policy, all personnel must exercise due diligence to prevent corruption in all forms, as follows:

6.1 Bribery

The giving or receiving of bribes in any form is strictly prohibited in exchange for any benefit whatsoever. Employees must not offer, give, solicit, or accept bribes, nor may they authorize or instruct any other person to give or receive bribes on their behalf.

6.2 Gifts, Other Benefits, and Business Hospitality

Gifts, other benefits, and business hospitality may be provided or accepted only in accordance with the Company's established guidelines. The Company recognizes the importance of maintaining good business relationships, provided that such activities are transparent and part of normal business practice under applicable laws, regulations, local customs, and trade practices. Such actions are permissible when:

- 1) They are not intended to influence improper actions or decisions or to obtain undue business advantage.
- 2) They comply with this policy, the Company's business ethics, and relevant laws and regulations.
- 3) They are given or received on behalf of the Company, not in a personal capacity.
- 4) They are reasonable and appropriate for the occasion or customary practice.
- 5) They are conducted openly.
- 6) Business hospitality is necessary and reasonable in cost and frequency, without extravagance.

6.3 Charitable Donations and Sponsorships

Charitable donations and sponsorships must comply with Company policies and guidelines, without expectation of personal or organizational benefits.

Personnel must ensure that donations or sponsorships are not used to conceal bribery and must follow transparent procedures in line with applicable laws and Company approval processes.

Donations and sponsorships must be traceable, monetarily quantifiable, and not linked to improper benefits, except for general business recognition.

6.4 Political Contributions

- 1) The Company maintains political neutrality and does not provide financial or in-kind support to any political party or candidate.
- 2) Personnel may exercise political rights under applicable law (e.g., voting) but must not use Company resources or act in the Company's name for political activities.
- 3) Personal political activities must be separate from Company business and must not imply Company support.

6.5 Conflict of Interest

- 1) Directors, executives, and employees must avoid actions that may create a conflict of interest with the Company or benefit themselves or others improperly.
- 2) Confidential information must not be used for personal or third-party gain.
- 3) Directors and executives must abstain from participating in decisions where they have a direct or indirect conflict of interest.

6.6 Hiring of Government Officials

- 1) The Company shall not hire current government employees unless legally permitted or required, following a transparent and lawful process.
- 2) Hiring includes current or former government officials, political office holders, and related family members who may influence business.
- 3) A two-year cooling-off period applies for appointing former government officials or regulatory staff to executive or board positions.
- 4) Selection of such personnel must be reviewed and approved by the relevant Committee based on merit and without political influence or conflict of interest.
- 5) Due diligence must be conducted to identify potential conflicts of interest.
- 6) Appointments of former government officials to executive or board positions must be disclosed in the Company's annual report.

6.7 Facilitation Payments

Facilitation payments or any payments intended to improperly influence government or business transactions are strictly prohibited. All dealings with government authorities must be transparent, lawful, and in accordance with official procedures.

6.8 Risk Assessment and Financial Reporting

- 1) The Company conducts regular risk assessments of corruption-prone activities and internal control reviews, with independent annual internal audits.

- 2) Financial statements are prepared in accordance with applicable accounting standards and must be accurate, reliable, and verified by certified auditors.

6.9 Corporate Culture

The Company is committed to maintaining a corporate culture that considers all forms of corruption unacceptable in both public and private sector dealings.

6.10 Reporting of Corruption

All Company personnel, at every level, must not ignore or overlook any actions that may constitute corruption involving the Company. They are required to report such incidents to the responsible parties and fully cooperate in any fact-finding or investigation processes, in accordance with the Company's Whistleblowing and Complaint Handling Policy.

6.11 Protection of Personnel

Personnel who refuse to engage in corruption shall be protected and not subject to demotion, penalties, or adverse consequences, even if the refusal results in lost business opportunities.

6.12 Employee Participation

The Company encourages directors, executives, and employees to actively participate in anti-corruption initiatives and whistleblowing.

6.13 Leadership Integrity

All directors and executives must act with integrity, set an example, and support Human Resources in disseminating knowledge, promoting understanding, and encouraging adherence to the Anti-Corruption Policy as part of the organizational culture.

6.14 Human Resource Processes

The policy applies to all HR processes, including recruitment, selection, promotion, training, performance evaluation, compensation, and career advancement. Supervisors must communicate and enforce compliance effectively.

6.15 Alignment with Governance and Ethics

The Company's anti-corruption measures align with its corporate governance, sustainability, ethics, business conduct, operational regulations, and other applicable practices.

6.16 Communication and Disclosure

The Company shall communicate and disclose information regarding the Anti-Corruption Policy and related measures to personnel, stakeholders, and business partners through various channels, including the Company website, annual report (Form 56-1/One Report), or other appropriate means, to ensure transparency and accountability.

7. Reporting and Whistleblowing of Corruption (Refer to the Company's Whistleblowing Policy)

7.1 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

7.2 Protection of Whistleblowers and Complainants

The Company has a whistleblowing policy and has established measures to protect whistleblowers, complainants, and related parties. All information related to complaints will be treated as confidential, taking into account the safety and potential risks to the whistleblower or complainant.

7.3 Investigation

Under the Company's whistleblowing and complaint policy, the Internal Audit Department will receive reports submitted through the designated channels. Upon receiving reports of corruption or fraudulent activities, the Internal Audit Department will collect relevant information and details for a preliminary review of the issue. The findings will then be presented to the Audit Committee, which may appoint an investigation committee to conduct a formal inquiry into the alleged corruption or fraudulent activities. The investigation committee will report the results to the Audit Committee.

7.4 Recordkeeping and Reporting

The Company Secretary of the Audit Committee is responsible for maintaining a register of all received whistleblowing reports and complaints regarding corruption. A summary report of all reports received, whether resolved or under investigation, shall be prepared and presented to the Audit Committee at least quarterly. The Audit Committee will then report these matters to the Board of Directors for acknowledgment.

8. Communication and Training

8.1 The Company communicates its anti-corruption policy and measures to employees, business representatives, and business partners to enhance knowledge, understanding, and awareness of the importance of anti-corruption, and to encourage collective participation in preventing corruption. Communication is conducted through various channels, such as email, the Company's website, the annual report, orientation programs, and training sessions. The Company also publicly discloses information regarding its anti-corruption policy and measures.

8.2 The Company provides periodic training to its personnel on various forms of corruption, the risks associated with involvement in corrupt practices, and the procedures for whistleblowing. This training is included as part of the orientation program or prior to assuming duties for directors, executives, and all new employees of the Company. The Company also conducts efficiency assessments of the training programs to ensure their effectiveness.

8.3 If employees have any questions regarding this policy or any anti-corruption measures, they may consult the Secretary to the Audit Committee.

9. Disciplinary Actions

Any Company personnel who intentionally fail to comply with this Policy, or who violate or disregard the Anti-Corruption Policy, including those who engage in retaliation, intimidation, discrimination, or any unfair treatment against whistleblowers or persons involved in a report or complaint under this Policy as a result of such reporting, shall be deemed to have committed a disciplinary offense. Such personnel shall be held responsible for compensating the Company or any affected parties for damages arising from their actions and may also be subject to civil and criminal liabilities, or other applicable legal consequences.

10. Policy Review

The Company shall review the Anti-Corruption Policy at least once a year.

11. Enforcement

This Anti-Corruption Policy shall be enforced from the date of its official announcement.

Announced on 13 November 2025.

Signed -*Chaiyawat Wibulswasdi*-

Dr. Chaiyawat Wibulswasdi

Chairman of the Board

KCG Corporation Public Company Limited