



## Anti-Bribery and Corruption Policy

### 1. Introduction

PECI-THAI Co., Ltd. is committed to conducting its business with transparency, honesty, and integrity. This Anti-Corruption Policy has been established with the objective of promoting transparency within the organization, enabling the Company to operate its business efficiently and sustainably. It also aims to build trust among customers, business partners, and stakeholders, as well as to foster an organizational culture that upholds integrity and transparency in all business operations.

Building a culture that emphasizes transparency enables all employees within the organization to adhere to ethical standards and comply with applicable laws and regulations.

Providing training and education on relevant policies and practices helps employees to correctly and effectively implement the Policy.

Furthermore, encouraging employees and stakeholders to report suspected incidents of corruption and supporting fair and impartial investigations will help foster a safe and trustworthy working environment for everyone within the organization.

### 2. Scope

This Policy shall apply to all employees of Peci-THAI Company, at all levels

### 3. Objectives

- To define the responsibilities of the Company and all employees in complying with and maintaining the Company's stance against bribery and corruption.
- To provide employees with information and guidance on how to identify and manage issues that may be related to bribery and corruption.
- In cases where there is any doubt about how to comply with the requirements of this Policy, employees are encouraged to seek advice directly from their immediate supervisor, the Human Resources Department, the Corporate Administration Department, or, where appropriate, from the Company's management.

### 4. Definitions

**4.1 Corruption** means the misuse of public power or authority for personal gain, bribery, or any improper conduct committed by a person entrusted with duties and responsibilities in either the public or private sector. This includes acts performed in violation of one's official duties or inappropriately in relation to one's position, whether as a government officer, employee of a private organization, agent, or in any other capacity or relationship, with the intent to unlawfully obtain benefits for oneself or for others.

**4.2 Bribery** means any asset or other benefit that is offered, promised, given, accepted, provided, or requested, which affects a decision in a way that incentivizes someone to act or refrain from acting in violation of their duties and responsibilities.

4.3 **Gift** means any item of monetary value, including assets, cash equivalents, or anything that can be exchanged for goods or services<sup>1</sup>

4.4 **Giving of Gifts** means the provision of gifts, souvenirs, or other assets in accordance with customs, traditions, or local practices, and includes occasions for expressing congratulations, gratitude, condolences, or gestures that demonstrate goodwill and foster positive relationships.

4.5 **Hospitality** means expenditures for business-related hospitality, such as meals and beverages, sporting events, or other expenses directly related to business activities, or customary commercial practices.

4.6 **Donation** means money or assets donated by the Company to benefit the public, provided that such donations are not made with the expectation of receiving benefits that could be considered bribery or corruption.

4.7 **Political Contributions** means providing support to political parties in any form, including the giving or donating of money, goods, gifts, hospitality, or other contributions that can be monetarily evaluated, as well as indirect assistance such as political advertising or participation in political activities, with the intent of gaining business advantages.

4.8 **Facilitation Payment** means a small, unofficial payment made to a public official solely to ensure that the official performs a routine process or to expedite the process, where such process does not involve the exercise of discretion by the public official.

4.9 **Kickback** means an amount of money negotiated to be deducted from the payment for goods or services and returned to the recipient as a bribe.

4.10 **Conflict of Interest** means any action taken by an individual — whether an employee, politician, government official, or service recipient — where personal interests are significant enough to influence the individual's decisions or performance in their official duties, thereby affecting the interests of the public or the organization.

4.11 **Public Official / Government Official** means any individual holding a political position, civil servant, or local government employee with a fixed position or salary; any employee or person working in a state enterprise or government agency; local executives and council members who are not in political positions; officials under laws governing local administration; and includes directors, subcommittee members, employees of governmental agencies, state enterprises, or government units, as well as any individual or group authorized to exercise governmental administrative power in carrying out any function under the law, whether established within the civil service, state enterprises, or other state-related operations.

4.12 **Foreign Public Official** means any person holding a legislative, executive, administrative, or judicial position in a foreign country, as well as any individual performing duties on behalf of a foreign government, including functions for government agencies or state-owned enterprises, whether by appointment or election, in a permanent or temporary position, and whether or not they receive a salary or other compensation.

4.13 **International Organization Official** means any person working in an international organization or any individual assigned by an international organization to perform duties on behalf of that organization.

4.14 **Business Partner / Counterparty** means any supplier of goods or services, contractor, contractor service provider, and/or service provider, whether a legal entity or an individual, providing goods or services to the Company.

4.15 **Employee** means any individual who has been permitted to perform work or provide benefits for, or within the premises of, an employer's business.

4.16 **External Stakeholder** means any individual, group, or organization that can influence the Company's decision-making processes and potentially affect the Company's objectives and success. It also includes those who are impacted by the Company's decisions and those who have an interest in the Company's business operations.

## 5. Roles and Responsibilities

### 5.1 Management Responsibilities

Management is responsible for overseeing the Company's overall anti-bribery and anti-corruption efforts, including establishing and approving policies and practices related to anti-bribery and corruption. Management is also responsible for prioritizing and supporting an effective anti-corruption system to ensure that the management team recognizes its importance and fosters it as part of the organizational culture.

### 5.2 Supervisor Responsibilities

Supervisors are responsible for communicating and implementing the Company's anti-bribery and anti-corruption policies, including establishing internal controls within each process to mitigate corruption risks. They are also responsible for organizing training and providing guidance on anti-corruption policies and related practices to personnel at all levels, ensuring understanding and enabling effective implementation of the Company's anti-corruption measures.

### 5.3 Employee Responsibilities

Employees are responsible for complying with the Company's anti-corruption policies and for promptly reporting any reasonable suspicions of policy violations encountered during the course of their work. Reports should be made directly to their immediate supervisor, the designated responsible person, or submitted in accordance with the Company's whistleblowing policy, providing necessary information to enable a thorough and careful investigation.

### 5.4 Disciplinary Actions

Employees found to have violated this Policy shall be subject to appropriate disciplinary actions, which may include immediate termination of employment or contract, and/or referral to relevant law enforcement or regulatory authorities.

## 6. Anti-Bribery and Corruption Practices

6.1 All directors, executives, and employees at all levels of the Company are required to comply with the anti-corruption policy. Directors, executives, and employees are strictly prohibited from accepting or engaging in any form of bribery or corruption, whether directly or indirectly. This includes giving or receiving money, goods, gifts, hospitality, donations, support to government agencies, political assistance, or any other benefits intended to obtain improper advantages from individuals or entities conducting business with the Company.

6.2 Directors, executives, and employees of the Company must not ignore or disregard any actions that may constitute bribery or corruption related to the Company. Such incidents should be reported to their supervisors or the relevant responsible persons. Furthermore, if there is any doubt or question regarding the anti-corruption policy, employees are encouraged to consult with their supervisors or the relevant responsible persons.

6.3 The Company provides a channel for reporting any actions that may constitute bribery or corruption related to the Company, both from internal employees and external parties. The Company ensures fairness and protects the rights of individuals who provide information or report incidents of bribery or corruption involving the Company.

6.4 The Company ensures continuous communication of the anti-bribery and corruption policy through its communication channels, such as emails, the Company's website, notice boards, and others. The Company also organizes training on anti-bribery and corruption for its employees.

6.5 To establish good business practices, the Company has a strict policy prohibiting any form of facilitation payment, whether direct or indirect, in exchange for expedited or preferential treatment in business operations.

To ensure clarity in implementing the anti-corruption policy and to prevent potential corruption risks, all directors, executives, and employees of the Company must exercise due care in the following matters

### **Gift-Giving Practices**

Directors, executives, and employees may give gifts, souvenirs, or other benefits to stakeholders, provided that the following conditions are met;

1. Gifts must be given in accordance with socially accepted customs and must not violate any laws. For example, in Thailand, the value of a gift must not exceed THB 3,000, in accordance with the announcement of the National Anti-Corruption Commission (NACC) B.E. 2563.
2. Gifts must not be cash or cash equivalents, such as vouchers or gift cards.
3. Gifts or souvenirs should be items that promote the Company's image, such as company-branded promotional products, products from royal projects, community-based products, or items supporting sustainable development.
4. Gifts must be given on behalf of the Company only, and not in the name of any director, executive, or employee of the Company.
5. Gifts must be appropriate to the context, of reasonable value, and suitable for the occasion. For example, giving gifts for company anniversaries, the opening of a new office, or similar events is acceptable. However, during procurement processes, gifts should not be given to public officials or any relevant authorities.
6. Gifts must not be given with malicious intent or as an act to influence, induce, or reward any individual for involvement, nor to obtain an improper advantage or any undue benefit.



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7. Gifts, souvenirs, assets, or any other benefits must not be given to the spouse, children, or associates of public officials, customers, business partners, or any related individuals, as such actions may be perceived as indirect acceptance or bribery.
8. All gift-giving must be approved only by the authorized personnel of the Company.

### **Gift-Receiving Practices**

Employees must not solicit or accept any gifts, benefits, or other forms of compensation from external parties that may influence or affect business decisions of the Company. In cases where acceptance is necessary due to customary practices or social etiquette and refusal would be inappropriate, employees shall comply with the procedures prescribed by the Company. The appropriateness of the gift or benefit must be carefully considered, taking into account its value, the nature of the occasion, and the intention of the giver.

#### 1. Types of Gifts That May Be Accepted

- General souvenirs such as pens, notebooks, calendars, or corporate promotional items bearing the company's logo
- Gifts given on traditional festivals or customary business occasions with a value not exceeding
- Flowers or fruit baskets given to express congratulations or condolences in accordance with customary social practices.
- Gifts received on behalf of the Company for shared or common use, such as souvenirs received from attending meetings, seminars, or business events.

#### 2. Gifts That Must Be Declined

- Cash, gift cards, coupons, discounts, or any items that can be converted into cash.
- Gifts of excessive value or gifts intended to influence business decisions.
- Invitations to receptions, trips, or entertainment events that exceed the normal scope of business-related activities.
- Gifts given during the process of bidding, procurement, or any approval considerations.

#### 3. Cases Where Acceptance of Gifts or Other Benefits Is Unavoidable

- Report to your immediate supervisor or the relevant department as soon as possible.
- Submit the gift to the Human Resources Department.
- The Human Resources Department shall record the details of the received gift.
- The Company may take appropriate actions, such as allocating the gift to internal departments for shared use, donating it for charitable or public purposes, or, in the case of perishable items, distributing them to employees as deemed appropriate.

#### 4. Cases Where the Company Receives Awards, Souvenirs, or Items from Competitions

In situations where the Company receives awards, souvenirs, or other items from competitions—such as recognition for the Company's achievements or contracts with business partners—the items may be accepted on behalf of the organization. The Company shall designate an employee at the department manager level or higher to act as the representative to receive such items.

**Guidelines for Hospitality / Entertainment Events**

Directors, executives, and employees of the Company may host hospitality or entertainment events for business partners, external stakeholders, agents, distributors, or other individuals related to the Company's business, provided that the following conditions are met:

1. Hospitality or entertainment expenses must be directly related to business activities, such as providing meals and beverages or hosting hospitality in the form of sports or similar events.
2. Hospitality or entertainment events must be conducted on behalf of the Company only, and not in the name of individual directors, executives, or employees.
3. Hospitality or entertainment events must be of reasonable value and appropriate to the occasion, such as hosting events for a project launch or celebrating the Company's anniversary. However, in cases where the Company is participating in a bidding process, hospitality and entertainment for government officials or related agencies should be avoided.
4. Hospitality or entertainment events must not be held in inappropriate venues or involve improper forms of hospitality.
5. Hospitality or entertainment events must not be conducted with malicious intent or used to unduly influence, induce, or reward any individual for involvement, to gain an improper advantage, or to obtain benefits inappropriately.
6. Hospitality or entertainment events must be requested for approval and disbursement, and can only proceed with authorization from the Company's designated approving authority.

**Guidelines for Donations**

Directors, executives, and employees of the Company must exercise due care and adhere to the following guidelines:

1. The use of the Company's funds or assets for donations must be conducted in the name of the Company only.
2. Donations must be made to foundations, charitable or public organizations, temples, hospitals, schools, universities, healthcare institutions, or organizations that serve public or social benefits.
3. Donations must be conducted transparently and in compliance with the law, ensuring that they are not used as a pretext for offering or receiving bribes.
4. For donation approval requests, the Human Resources Department is responsible for receiving requests from the requester and reviewing relevant documents from foundations, charitable or public organizations, and government agencies, such as donation request letters, organizational registration documents, and other related materials.
  - 4.1 Upon receiving approval for the donation from the Company's designated approving authority, the Human Resources Department shall coordinate with the relevant parties to deliver the assets to the donation recipient. The delivery must include documentation, such as taking photographs. In cases where approval is not granted, the Human Resources Department shall inform the requester of the reasons for the denial.



- 4.2 The supporting documents for donations shall be submitted by the Human Resources Department to the Accounting Department for record-keeping, to serve as reference for future audits or verification.
- 4.3 A letter of appreciation, certificate of acknowledgment, or receipt must specify the name and address of the donation recipient, the items and amount donated, and be properly signed by the authorized person. This documentation is required for the donation to be recognized as a company expense in accordance with the Revenue Code.
5. If it is found that any employee or group of individuals intentionally commits fraud in using cash, assets, products, or materials for donations, or if an investigation reveals that a donation involves acts suggestive of corruption, causing damage to the Company, the responsible employee(s) shall be held accountable for all resulting damages and shall be subject to disciplinary action, including severe penalties in accordance with the Company's regulations.

**Guidelines for Sponsorship or Financial Support**

Directors, executives, and employees of the Company must exercise due care and adhere to the following guidelines:

1. Sponsorship or financial support must be ensured not to be used as a pretext for offering or receiving bribes.
2. Directors, executives, and employees of the Company must not act as intermediaries in offering money, assets, goods, or any other benefits to parties related to the Company's business, including government agencies, in exchange for undue privileges or to cause government officials to disregard laws, regulations, or prescribed legal procedures.
3. Interactions with government agencies must be conducted transparently, in full compliance with applicable laws, and must strictly prohibit offering or accepting any form of bribery in the course of business.
4. Sponsorship or financial support must be verifiable, ensuring that the recipient has genuinely carried out the activities under the project. The support should aim to help achieve the project's objectives, promote the Company's business or brand, or fulfill the purpose of corporate social responsibility in a genuine and responsible manner.
5. The use of the Company's funds or assets to support projects must be conducted in the name of the Company only. Sponsorship or financial support must have a clear business purpose, enhance the Company's image and reputation, and be disbursed with clearly defined objectives, verifiable documentation, and in accordance with the Company's prescribed procedures.
6. Sponsorship or financial support must be requested for disbursement and can only proceed with approval from the Company's designated approving authority.

**Guidelines for Political Contributions**

The Company recognizes the importance of political participation as a socially responsible organization. However, the Company is committed to conducting its business with transparency and fairness. Therefore, clear guidelines are established to prevent any improper political contributions that may lead to corruption, as follows:

1. The Company shall not make any donations of money or other assets to political parties. The Company will not provide financial support to any political party, either directly or indirectly through foundations or other related organizations.
2. Company resources must not be used for political purposes. Employees and executives of the Company shall not use Company resources, such as working hours, vehicles, or office equipment, to support the political activities of any party.
3. No preferential treatment shall be granted to any political party or its members. The Company will not provide any privileges to political parties or their members, such as discounts, free services, or access to internal information.
4. The Company encourages employees to participate in political activities as individuals, using their personal time and resources to engage in political activities

**Guidelines for the Payment of Facilitation Fees and Change**

The Company has no policy to pay facilitation fees or kickbacks to government officials, customers, vendors, or other business partners in any form, whether directly or indirectly.

**Guidelines for Procurement and Third-Party Engagement**

Procurement and third-party engagement must comply with the Company's regulations and be conducted transparently, verifiably, in accordance with the law, and without any hidden interests. The use of third parties to interact with government officials or agencies must not be used as a conduit for offering bribes to such third parties.

**7.Actions Constituting Violations of the Anti-Corruption Policy**

All employees are required to comply with the Anti-Corruption Policy. The following actions are considered violations

1. Failure to comply with the Anti-Corruption Policy.
2. Advising, encouraging, or assisting others to violate the Anti-Corruption Policy.
3. Failing to act upon or ignoring observed violations or non-compliance with the Anti-Corruption Policy, in cases where the employee knows or should have known due to their responsibilities.
4. Failing to cooperate with or obstructing investigations into alleged violations or non-compliance with the Anti-Corruption Policy.





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5. Engaging in unfair or retaliatory actions against others for reporting non-compliance with the Anti-Corruption Policy.

*Directors, executives, and employees of the Company who neglect, omit, or intentionally fail to comply with the Anti-Corruption Policy shall be considered to have committed a serious disciplinary offense and will be subject to penalties under the Company's regulations. If such violations constitute illegal acts, the Company will take appropriate legal action in accordance with applicable laws.*

### **8. Whistleblowing Channels**

The Company provides whistleblowing channels to enable employees and related parties to report observed violations or suspected cases of corruption. When reporting, whistleblowers should provide details of the incident, including relevant information such as date, time, location, involved persons, and any supporting documents or evidence (if available), through the Company's designated channels.