

Anti – Corruption Policy

Yuasa Battery (Thailand) Public Company Limited

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Signature 
Chairman of Board (Acting)

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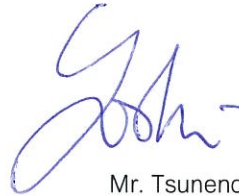
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Part 1: General Principles of Policy

Preface

Yuasa Battery (Thailand) Public Company Limited, as a listed company under supervision of the Stock Exchange of Thailand and the Securities and Exchange Commission, sets out to operate the business with transparency and fair competition. The company intends to join forces against corruption through collective action. An anti-corruption policy has been formulated for the company's directors, the management, the employees and the stakeholders to understand and adhere to the guidelines as operational standards. Then, a significant business foundation will be established for sustainable, transparent growth and equal competition in accordance with the company's intention.

All the directors, the management and the employees are required to study and strictly comply with the anti-corruption policy, in order to collaboratively improve the company on standard, transparent operation and gaining trust from the society and the stakeholders.



Mr. Tsunenori Yoshimura

Chairman of the Board of Directors (Acting)

Yuasa Battery (Thailand) Public Company Limited

Anti-Corruption Policy

The company prohibits the board of directors, the management, the employees and the stakeholders to perform any operation related to fraudulent and corrupt form for their own interest or the interest of their families, friends and others, in a direct or indirect way, as a recipient, giver or proposer of bribery in form of money or others to/from a government or private sector which contacts with the company. The board of directors, the management, the employees and the stakeholders shall comply with the anti-corruption policy, and such compliance shall be continually examined. The guidelines and regulations shall be reviewed in accordance with the business operation, regulations, rules and laws.

In addition, the company anticipates that all the employees will collaboratively monitor any behavior which is improper and in breach of the anti-corruption policy and the code of conduct. The company will give ear to and consider all complaints equally, transparently and fairly for all parties.

Objectives

- 1) To prevent, deter and suppress the board of directors, the directors, the management and the employees of Yuasa Battery (Thailand) Public Company Limited and the stakeholders from committing, involving or participating in any course of corruption.
- 2) To promote, improve and support the personnel's participation in anti-corruption campaigns by cultivating knowledge and awareness about anti-corruption as the organization's standard.
- 3) To build trust and reliance on business operation from the society and the stakeholders.

Scope of Policy

The anti-corruption policy obliges the directors, the management and the employees of Yuasa Battery (Thailand) Public Company Limited and the stakeholders, effective from the date of getting approval by the board of directors.

Definition

"Company"	means	Yuasa Battery (Thailand) Public Company Limited.
"Director"	means	the directors of Yuasa Battery (Thailand) Public Company Limited.
"Management"	means	the chief executive officer, the chief engineering officer and the chief operating officer.
"Stakeholder"	means	any shareholder, customer, business partner, creditor, competitor, government section as well as other related organizations and persons.
Conflict of Interest	means	a conflict in which individual interest of the company's directors, management, employees as well as their relatives, family members and friends are opposed to the company's interest in a direct or indirect manner.
Family Member	means	any spouse, child, father and mother.

Relative	means	any parent, descendant, full sibling, half-sibling, uncle, aunt, spouse of parent, descendant, adopted child or adopter.
Tradition	means	any festival or important day when people give gifts as well as any occasion when people express congratulations, gratitude, welcome and condolence or provide help in the way that has generally existed in the society.
Complainee	means	any person or juristic person who has been complained on fraudulent or corrupt behavior or participation in fraud or corruption under the anti-corruption policy.
Complainant	means	any person or juristic person who has been affected by fraud or corruption or notice of fraudulent or corrupt behavior.
Complaint	means	an act of reporting fraudulent or corrupt action which violates the principles of association, anti-corruption policy and laws.
Investigation	means	a fundamental attempt of seeking facts and evidence to find out whether there is a misconduct as complained.
Fact Finding	means	an act of checking facts and collecting all relevant evidence, listening to witnesses, deponents or experts, and examining documents.
Inspection	means	an act when the authorized persons ask questions, collect all relevant evidence and make any actions regarding the alleged misconduct, in order to verify the information or prove the allegation and consider the outcome.
Fraud	means	an act of seeking any interest in an illegal manner.
Corruption	means	an abuse of entrusted power for interest of one's own, the others or the organization, including but not limited to giving and/or taking bribes, demanding or threatening for interest, giving interest and causing conflicts of interest, unless allowed otherwise by the law, rules, regulations, local tradition or trade customs.
Government Official	means	a government official, employee, subcontractor, team or person who works for a governing agency, a person holding political office or a local employee with permanent office or salary, a jurisdiction committee, a committee or person who uses government authority to legally take any actions to issue an order or make a resolution affecting any persons.
Giving/Receiving Bribes	means	an act of giving, offering, promising to give, receiving, or soliciting money, assets, or any other benefits which is inappropriate for government officials, private individuals, or persons with related duties, in a direct or indirect way, in order to induce such persons to perform or refrain from performing their duties to obtain or maintain business or any other improper benefits in business.
Giving/Receiving Gifts	means	an act of giving or receiving gifts, souvenirs, money, or any other assets according to customs or traditions, including on occasions to express

congratulations, gratitude, condolences, or to show goodwill or good relationships.

Entertainment	means	an act of providing meals, beverages, travel expenses, accommodation, or any other services, including shows, sports events, participating in sports activities, or study trips both domestically and abroad, as well as other recreational activities, for the purpose of building business relationships.
Reception	means	an act of receiving or providing assistance and support to visitors in a friendly and attentive manner, ensuring that they feel comfortable and satisfied.
Giving/Receiving Sponsorship	means	an act of providing or receiving financial support, products, or services to or from those requesting such support, with the purpose of carrying out public benefits for society or promoting the business and enhancing the company's image.
Charitable	means	an act of donating money, products, or any other benefits to individuals or legal entities, such as associations, foundations, public organizations, temples, hospitals, educational institutions, or organizations that provide social benefits in accordance with the provisions of Section 65 Ter (3) of the Revenue Code.
Political Contribution	means	an act of providing money, assets, rights, or any other benefits to assist, support, or provide any advantage to political parties, politicians, or politically affiliated individuals, as well as political activities, in a direct or indirect way. This excludes participation in activities that fall under personal rights and freedoms.
Conflict of Interest	means	a situation or action where the company's directors, executives, or employees have personal interests or those of close associates that affect their decision-making, or where they are unable to perform their duties impartially, resulting in the precedence of personal benefits or those of associates over the collective good. Such actions may occur intentionally or unintentionally and can take various forms, eventually becoming commonplace without being recognized as wrong. This leads to biased decision-making, with personal interests or those of associates being the primary consideration.
Facilitation Payment	means	small payments made to government officials to ensure that they carry out their procedures or to expedite them. These procedures do not require the discretion of the government officials and are actions they are obliged to perform as part of their duties. These payments ensure the legal rights of the entity, such as obtaining permits, certifications, and public services.
The Company's Confidential Data	means	the company's data that cannot be disclosed to the public as it may negatively affect business operations. This includes plans, unaudited financial results and statements, meeting resolutions that are not to be disclosed to the Stock

Exchange of Thailand, business forecasts, customers' data, selling cost and production formula.

Promotional Gifts from means
Purchases of Products
and Services

products or services given for free after the purchase of primary products or services to incentivize customers to purchase. Most promotional gifts may be other products or the same type of the purchased item, providing a factor in the decision to choose the products or services.

Duties and Responsibility

To assure that the anti-corruption policy and its guidelines will be actually implemented and clearly supervised, the company determines the duties and responsibility of the persons or the sections under the anti-corruption policy framework as follows: -

1. Board of Directors

- 1.1 Approve the issuance and review of policies and regulations related to anti-corruption of the company, to be used as guidelines for all executives and employees.
- 1.2 Conduct oneself as a good example to all employees in the company, raising awareness of the importance of anti-corruption and embedding of these practices into the company's culture.
- 1.3 Appoint an investigation committee in the event of complaints related to corruption involving company directors or employees at level 12 and above.
- 1.4 Acknowledge investigation results of complaints concerning directors and employees at all levels. For employees at levels 0-11, the report is provided by the corporate governance committee; for directors or employees at level 12 and above, the report is provided by the company secretary. This includes approving the investigation results concerning directors and employees at level 12 and above, regarding penalties and collaborating on countermeasures with the chief executive officer.
- 1.5 Strictly adhere to the company's policies, rules, regulations, and orders related to anti-corruption.

2. Audit Committee

- 2.1 Receive complaints from whistleblowers, according to the anti-corruption policy.
- 2.2 Acknowledge complaints from employees at levels 0-11 and investigation results from the ad hoc committee, in accordance with anti-corruption and anti-bribery policies and measures.
- 2.3 Assess the risks related to corruption.
- 2.4 Review documents supporting the checklist for applying for or renewing the anti-corruption certification, and sign off on the document review.
- 2.5 Acknowledge audit plans, audit results, and reports on corruption-related risk assessments, according to the anti-corruption policy, from the internal audit department.
- 2.6 Review financial and accounting reporting systems, internal control systems, internal audit systems, and risk management systems to ensure they meet international, rigorous, appropriate, up-to-date, and effective standards.

3. Corporate Governance Committee

- 3.1 Review the anti-corruption policy and related regulations to ensure they are appropriate for the business model, organization, and corporate culture, making them understandable and convenient for those involved, and requesting approval at the board of directors meeting.

- 3.2 Review and update the anti-corruption policy and related policies annually, or when significant changes occur, such as changes in the law, and requesting approval of the updated policies at the board of directors meeting.
- 3.3 Review reports on corruption risk assessments, monitor the management of corruption risks, and ensure that risk management is maintained at an acceptable level.
- 3.4 Acknowledge complaints from employees at levels 0-11 and review the investigation reports from the ad hoc committee, according to anti-corruption policies and measures, and report these at the board of directors meeting.

4. **Chairman of the board**

Responsible for complaints related to employees at level 12 and above, as well as company directors, as follows:-

- 4.1 Acknowledge complaints from the company secretary and instruct the company secretary to circulate a letter to the board of directors, requesting their opinions on appointing an investigation committee.
- 4.2 Approve extensions for investigations if the investigation committee is unable to complete the investigation within the specified timeframe.
- 4.3 Direct expedited investigations if they are not proceeding within the specified timeframe.
- 4.4 Sign and notify the results of the complaint to the complainee.

5. **Chief Executive Officer**

- 5.1 Implement a systematic approach to anti-corruption by supporting the anti-corruption policy and communicating it equally to executives, employees, and all relevant parties without discrimination.
- 5.2 Require each department head to advocate and promote awareness among all levels of employees about the importance of adhering to the anti-corruption policy, and to review the appropriateness of systems, processes, and measures to ensure they align with changes in business, rules, regulations, and legal requirements.
- 5.3 Preliminarily consider and review the anti-corruption policy before presenting it to the corporate governance committee for consideration.
- 5.4 Receive complaints, according to the anti-corruption policy.
- 5.5 Provide advice and support for investigations and fact-finding conducted by the investigation committee as informed, address urgent issues related to corruption investigations involving employees at levels 12 and above, including the board of directors.
- 5.6 Appoint an ad hoc committee to investigate fraud and corruption involving employees at levels 0-11, acknowledge the investigation results, and consider penalties.
- 5.7 Direct expedited investigations if they are not proceeding within the specified timeframe for complaints involving employees at levels 0-11

- 5.8 Assess corruption risks as presented by the internal audit department.
- 5.9 Review documents supporting the checklist for applying for or renewing the anti-corruption certification, and sign off on the document review.

6. Ad Hoc Committee

Responsible for complaints related to employees at levels 0-11

- 6.1 The chief executive officer appoints an ad hoc committee to investigate and examine corruption-related complaints, summarize the findings, and present the results and opinions on penalties to the chief executive officer if the complaint is found to be valid
- 6.2 Receive written requests for damage relief from individuals affected by complaints.

7. Investigation Committee

Responsible for complaints related to employees at levels 12 and above, including the board of directors

- 7.1 The board of directors appoints an investigation committee to investigate and examine corruption-related complaints, summarize the findings, and present the results and opinions on penalties to the board of directors if the complaint is found to be valid.
- 7.2 Receive written requests for damage relief from individuals affected by the complaint.

8. Internal Audit Department

- 8.1 Collect and review the anti-corruption policy annually or when significant changes occur, and consult with the legal department or the committee established for this policy.
- 8.2 Present the anti-corruption policy to the chief executive officer and the corporate governance committee for review before requesting approval from the board of directors.
- 8.3 Identify issues and indicators, assess corruption-related risks, and report to the chief executive officer and the audit committee respectively for consideration. Subsequently, present these risks to the corporate governance committee for acknowledgment.
- 8.4 Develop an audit plan, review compliance with the anti-corruption policy, and prepare reports for the audit committee and the corporate governance committee to ensure the company's internal controls are adequate and appropriate for managing corruption risks.
- 8.5 Compile data from audits related to fraud or corruption risks to review and update the anti-corruption policy and related practices, and present these updates to the corporate governance committee and the audit committee for consideration.
- 8.6 Provide advice and respond to inquiries from employees regarding actions that may involve corruption related to the company.

9. Legal Department

- 9.1 Open the suggestion box every Monday to receive whistleblower tips and complaints, and verify facts as reported, in collaboration with the human resource department.
- 9.2 Review complaints, in collaboration with the human resource department, to determine if they involve corruption related to the company. If a complaint is found to involve corruption, present the issue to the chief executive officer in order to appoint an ad hoc committee.
- 9.3 Provide advice and respond to employee inquiries regarding actions that may involve corruption related to the company.
- 9.4 Collaborate with the internal audit department to review and update the anti-corruption policy and related practices.
- 9.5 Serve as a primary operator in collaboration with the human resource department for investigating complaints.

10. Human resource department

- 10.1 Open the suggestion box every Monday to receive whistleblower tips and complaints, and verify facts as reported, in collaboration with the legal department.
- 10.2 Receive whistleblower tips and complaints, and review them with the legal department to determine if they involve actions that constitute corruption related to the company.
- 10.3 Provide advice and respond to employee inquiries regarding actions that may involve corruption related to the company.
- 10.4 Serve as a primary operator in collaboration with the legal department for investigating complaints.
- 10.5 Maintain records related to complaints from employees at levels 0 – 11.
- 10.6 Prepare a report on the complaint process, including receipt of complaints, investigation progress, findings, penalties, and annual summary of complaints for employees at levels 0–11. Submit the report through the secretary of the corporate governance committee and the secretary of the audit committee for presentation to the corporate governance committee and the audit committee respectively. Also, submit it to the company secretary for presentation to the board of directors.
- 10.7 Organize training to provide knowledge on anti-corruption practices.
- 10.8 Post anti-corruption policies and practices in a visible location at the workplace.
- 10.9 Enforce penalties for violations of laws, rules, regulations, and anti-corruption policies as directed by the chief executive officer or the chairman of the board of directors.
- 10.10 Ensure that company policies, practices, regulations, and manuals align with the anti-corruption policy.
- 10.11 Compile reports on conflicts of interest for employees at levels 0 – 11, and present them to the chief executive officer. Summarize and submit the report to the company secretary for presentation at the board of directors meeting once a year.

- 10.12 Conduct recruitment and verify the information on hiring government employees for positions such as executives, advisors, staff, and company contractors, and report to the chief executive officer through the chief operating officer for approval of such hiring.
- 11. Operation Department**
- 11.1 Handle the approval process and keep records of support for political activities, reports of giving/receiving gifts, assets, or any other benefits by employees at all levels, as well as company directors.
- 11.2 Create a register to control the receipt of gifts and promotional items to use as evidence for receipt, control, and disbursement. Also, store the gifts and promotional items at the respective department.
- 12. Purchasing Department**
- 12.1 Communicate the company's anti-corruption policy to all business partners.
- 13. Company's secretary**
- Responsible for coordinating and implementing anti-corruption policies related to employees at levels 12 and above, including company directors
- 13.1 Receive complaints or tips from the legal department or the human resource department.
- 13.2 Coordinate with the board of directors to appoint an investigation committee and serve as the committee's secretary.
- 13.3 Store records related to complaints.
- 13.4 Prepare letters to the chairman for signing an order to appoint the investigation committee, and notifying the outcome of complaints.
- 13.5 Prepare a summary report of the findings on complaints, and present it at the board of directors meeting.
- 13.6 Compile and store reports on conflicts of interest and present them to the chairman.
- 13.7 Verify information about government employees who will be appointed as company directors, and report to the board of directors for approval.
- 13.8 Disclose information regarding the hiring of government officials/employees in the company's annual report.
- 14. Employees at All Levels**
- 14.1 To strictly comply with the company's policies, regulations, rules and orders related to anti-corruption.
- 14.2 To report any clue, suspicious circumstance, fraudulent or corrupt behavior of the board of directors, the management, the employees and the stakeholders.
- 14.3 To support and participate in the fraud and corruption prevention and suppression.

Publication of Anti-Corruption Policy

For all the employees to know and understand the anti-corruption policy and guidelines for correct and proper implementation, the anti-corruption policy and guidelines will be publicized through the following activities: -

- 1) The company regularly provides anti-corruption training to let all the employees realize the anti-corruption policy, forms, risks to involve with corruption, penalties for violation of the policy and whistleblowing procedure upon notice of possible corruption.
- 2) The company publicly posts the anti-corruption policy and guidelines where all the employees can access to and read.
- 3) The company publicizes the anti-corruption policy and guidelines through its communication channels, such as the corporate website and annual reports.

Monitoring and Review

After this anti-corruption policy is announced, the company shall review and improve the anti-corruption policy and guidelines regularly every year or when a significant change affects the operation, so that the anti-corruption policy and guidelines are in accordance with the company's regulations, other relevant rules and laws. The process of reviewing, improvement and timeframe are as follows:

- 1) Internal Audit Department will collect the data to impact for the operation accordance to anti-corruption policy and practices.
- 2) Internal Audit Department and Legal Department will join to review and to improve anti-corruption policy to comply and to be appropriate.
- 3) Internal Audit Department will propose anti-corruption policy only reviewed and improved to the Corporate Governance Committee for consideration and propose to the board of director for approval.

Part 2: Anti-Corruption Practice

General Anti-Corruption Practice

The board of directors, the management, the employees and the stakeholders shall strictly comply with the anti-corruption policy and guidelines. They shall not involve with any fraud or corruption in a direct or indirect way. The anti-corruption guidelines are defined as follows: -

- 1) The directors and the management shall realize the importance of publicizing, providing knowledge, giving advice about the anti-corruption policy to make their subordinates understand and comply with this anti-corruption policy. The directors and the management shall be role models of honesty, morality, and ethical conduct.
- 2) The company's policies, guidelines, regulations and handbooks shall be formulated in accordance with the anti-corruption policy.
- 3) As guidelines for operations, this anti-corruption policy covers personnel management procedures, including nomination/selection, promotion, training, performance evaluation and reward.
- 4) The employees shall not neglect or ignore any action which is within the scope of fraud or corruption related to the company. They shall report the action to their supervisors or authorized persons, and cooperate in verification of facts.
- 5) If the employees have any doubts or inquiries, they could consult with their supervisor, the legal department, the human resources department, the internal audit department or a person assigned to be responsible for monitoring compliance with the anti-corruption policy through various channels specified.
- 6) Disciplinary and/or legal penalties for violations of laws, rules, regulations, anti-corruption policies, and related company policies will be implemented fairly and equitably, based on intent, circumstances, and the outcome of the misconduct. No discrimination will be made based on position, authority, employee level, or gender.

In addition, the following nine guidelines are given to prevent against risks of fraud or corruption. The guidelines no. (1) – (6) will be explained in Section 2: Guidelines on Anti-Corruption Policy. The guidelines no. (7) – (9) will be described in Section 3: Whistleblowing, Inspection and Penalties.: -

- (1) Conflicts of Interest Practice
- (2) Political Contribution Practice
- (3) No Gift Practice
- (4) Charitable & Sponsorship Practice
- (5) Facilitation Payment Practice
- (6) Revolving Door (Hiring Practice)
- (7) Practice of Whistle Blowing or the complaint of corruption
- (8) Practice of Data Disclosure and Confidentiality
- (9) Practice of Investigation, Inspection and Punishment

Conflict of Interest Practice

The company has established that directors, executives, and employees must not seek personal benefits that conflict with the company's interests. Any actions must be aimed at serving the best interests of the company. If a conflict of interest arises, those involved or with a stake in the transaction must disclose their relationship or interest in the transaction and must not participate in its consideration or approval.

1. Forms of Conflicts of Interest

- 1.1 **Competition with the Company** – The directors, executives, and all employees must not engage in or invest in activities that compete or could potentially compete with the company's business, in a direct or indirect way, for personal gain or the gain of others. This includes being a partner, shareholder with decision-making authority, or executive in a competing or similar business.
- 1.2 **Personal Benefit from Company Transactions** – The directors, executives, and all employees must disclose any business or personal activities, or those of their family or relatives that could create a conflict of interest with the company's business.
- 1.3 **Use of Company Information for Personal Gain** – The directors, executives, and all employees must not seek personal or others' benefits by using the company's confidential information and must strictly adhere to the company's internal data usage policies.
- 1.4 **Holding Shares or Directorships in Other Businesses** – When the directors, executives, or employees hold significant shares or serve as directors or advisors in other businesses, these positions must not interfere with their duties or impact their work for the company. The directors, executives, and employees with a stake in a particular agenda must abstain from voting or participating in meetings where a conflict of interest exists.

2. Handling and Monitoring Transactions with Potential Conflicts of Interest

The board of directors must implement measures to monitor transactions that may have conflicts of interest, ensuring thorough and independent evaluation within the framework of good corporate governance for the company's benefit. The procedures are as follows:

- 2.1 If the directors, executives, or employees are involved in transactions where they have a conflict of interest, they must not participate in the decision-making process regarding those transactions.
- 2.2 The directors, executives, and employees should avoid engaging in transactions that could be classified as related transactions, according to the regulations of the Securities and Exchange Commission (SEC) or the Stock Exchange of Thailand ("Related Transactions"), which might create conflicts of interest with the company. Also, they must adhere to the disclosure requirements and guidelines for related transactions.
- 2.3 If related transactions do not conform to general commercial terms as approved by the board of directors, or if the transaction's nature or size exceeds the management's decision-making authority,

the audit committee should review and provide opinions before presenting the matter for approval of the board of directors or shareholders, as applicable. The company will disclose transactions with conflicts of interest and related transactions in the notes to the audited financial statements, the annual report, and the Form 56-1.

3. Conflicts of Interest Report

All the directors, the management and the employees are required to show their transparency by disclosing their private interest which conflicts with the company under the following conditions and periods: -(Procedure of Conflict of Interest according to annex 1.1 and 1.2)

- 3.1 All the directors, the management and the employees shall submit conflict-of-interest reports as below: -
 - 3.1.1 To make Conflicts of interest Report within 1 month after effective this anti-corruption policy, except it was progress already before this policy.
 - 3.1.2 Rotation, new employee or new appointment
 - 3.1.3 Conflict of Interest transaction occur during the year or involved work with risk of Conflict of Interest for the employees at level 6 upward.
 - 3.1.4 Make a report when you find or have a conflict of interest situation occur during the year or when it is related to the nature of work that is at risk of conflict of interest.
- 3.2 Conflict-of-interest reports for the directors and the employees at each level
 - 3.2.1 The employees at level 0-11 shall make conflict-of-interest reports (annex: report form item no.1) in the form provided, and submit them to the human resource department which will collect and propose them to the chief executive officer.
 - 3.2.2 The directors and the employees at level 12 upward to the director shall make conflict-of-interest reports (annex report form item no.1) in the form provided, and submit them to the company secretary who will collect and propose them to the Board of Directors Meeting.

4. Reporting and Consideration on Conflicts of Interest

When Human Resource Department or company's secretary receive the Conflicts of Interest Report, Human Resource Manager or the company's secretary will make the report to Chief Executive Officer or Chairman of the Board depends on case immediately as possible. And when Chairman of the Board received the report from the Company's Secretary or Chief Executive Officer received the report from Human Resource Department shall perform either of the following operations: -

- 4.1 In case of no conflict of interest: the board of directors or the chief executive officer, as the case maybe, acknowledges such reports.
- 4.2 In case of conflict of interest:
 - 4.2.1 Employee in level 0-11, Chief Executive Officer acknowledge the report and /or to have the opinion for managing that transaction of conflict of interest. Afterward, Human Resource

Department will inform to the reporter to acknowledge and operation. It must be progress before the reporter make that transaction of conflict of interest.

- 4.2.2 Employee in level 12 upward to the director, Chairman of the Board acknowledge and to have opinion for managing the conflict of interest that transaction. Afterward, the company's secretary will make the circulation letter to the director for acknowledgement and inform the result to the reporter before making that transaction.

5. Storage of Conflict-of-Interest Disclosure Reports

The company provides secure storage of the reports, documents and copies of any document relevant to conflicts of interest. Accessibility to such data is limited to authorized employees only. Periods of eliminating the documents are set as below:

5.1 Annual Summary Report

- 5.1.1 The human resource department is responsible for collecting reports of employee in level 0-11 and making a conclusion report to submit to the Chief Executive Officer every year end.
- 5.1.2 The company's secretary is responsible for collecting reports of employee in level 12 upward to the director and making a conclusion report according to submit to the Chairman of the Board every year end.

5.2 Period of keeping conflict-of-interest reports

- 5.2.1 In case of no conflict of interest, such reports shall be kept at least two years after termination of employment.
- 5.2.2 In case of conflict of interest, such reports shall be kept until the end of prescription.

- 5.3 The internal audit department will examine transactions involving conflicts of interest and report the results to the audit committee and the corporate governance committee annually.

Political Contribution Practice

The company supports politics and political activities under constitutional monarchy. However, the company will not support any actions taking sides in a particular political party. This includes the use of the company's resources for any activities which make the company politically biased. So, the company determines the principles of political contribution for the directors, the management and the employees to comply with as follows: -

- 1) The company will not provide any financial supports or resources in a direct or indirect manner for interests of a politician, a political authority figure, a political party or its own business.
- 2) The company will not participate in any political campaigns to promote a politician, a political authority figure or a political party in the company's area. This includes the use of the company's resources to support such actions.
- 3) The directors, the management and the employees can exercise their right as a good citizen by expressing, participating in, supporting and using political right on behalf of individuals beyond the office hours and outside the workplace with their own resources only. Also, any political opinions which may cause a conflict of thought should not be given during the office hours.
- 4) The directors, the management and the employees are prohibited to use the company's name, logo, position or employment status to support any political activities or persuade other people to support any politicians, political authority figures or political parties, in a direct or indirect manner.
- 5) The directors, the management and the supervisors at all levels are prohibited to order or persuade the employees or the subordinates to participate in any activities of a political party or any kind of political group.
- 6) For any requests for assistance or contribution for a political party or a politician, the company will not provide assistance in any cases. If necessary, the company might inform the requestor of its policy on political contribution and will reject that request.
- 7) If the company is necessary to make the activity or to support the political in according to the law, the political contribution shall be contrary to public morality and not damage to the society as a whole. The company could make but it must have the appropriate transparent and disclosing, moreover, it must be approved by CEO. Operation Department would be the maker to propose for approval. Moreover, this political contribution must be confident that it shall not be the channel for corruption and must have evidence for usage according to the objective. (Process of Political Contribution according to annex 2)
- 8) Operation Department must keep the evidence of the political contribution for 4 years.
- 9) The internal audit department will examine transactions involving political contribution and report the results to the audit committee and the corporate governance committee annually.

No Gift Practice

The company realizes that an act of giving/receiving gifts, assets or other interests and entertainment might be a channel of corruption. However, establishment of good relationship with business partners, distributors, business allies and government agencies are important for business operation. As a result, the company determines the guidelines on giving/receiving of gifts, assets or other interests and entertainment for the directors, the management and the employees to follow with transparency and expression of kindness in various occasions as appropriate, in accordance with the announcement of the National Anti-Corruption Commission. For such giving/receiving of gifts, assets or other interests and entertainment, any behaviors showing corruption shall not be conducted in order to gain interests in an indirect manner.

1. Giving gifts, asset or other benefits

The directors, the management and the employees can give any gifts, assets or other interests traditionally or on occasions as appropriate. Such giving should be done in the form of promoting the company's image, and shall not be in breach of relevant laws. Also, it must not be done with an intention to persuade the receiver to provide facilitation or advantages over the competitors, or reverse the company's wrong action to the right one. Therefore, the company defines the guidelines on giving of gifts, assets or other interests as follows: -

- 1.1 The giving of gifts, assets or other interests on behalf of the company can be done upon order or approval in accordance with the company's authority regulations. Such giving should be made in public and can be disclosed to the employees or other persons.
- 1.2 Any gifts, assets or other interests given to a government official, a state enterprise official or a government agency should not exceed the amount to 3,000 baht / piece / person / project. If necessary, the giving exceeding the amount to 3,000 baht shall be approved by the chief executive officer.
- 1.3 The giving of gifts, assets or other interests to a person or juristic person who/which is not a government agency, government official or state enterprise official, the amount can be considered in accordance with the company's authority regulations.
- 1.4 The abovementioned practices shall not be in breach of the announcement of the National Anti-Corruption Commission regarding the regulations of receiving of assets or other interests with government officials' morality.
- 1.5 To request for approval of withdrawing expenses to procure gifts, assets or other interests, the following guidelines is defined for compliance. (The process of giving gifts, assets or other interests in accordance with the annex 3.1 and 3.2): -
 - 1.5.1 A memorandum shall be made to request for approval in accordance with the company's authority regulations. In the event that the gift, asset or other interests are given to a government official or government agency and have the amount exceeding 3,000 baht, such giving shall be approved by the chief executive officer.

- 1.5.2 After approval of the memorandum, the requesting department can provide the gift, asset or other interests in accordance with the company's procurement handbook.

2. Receiving the gifts, asset or other benefits

The company does not allow the directors, the management and the employees to receive any gifts, assets or other interests from customers, distributors and business allies, except that such receiving is done traditionally or on occasions as appropriate. This is to prevent any frauds, bribes or bad intentions to persuade the employees to provide facilitation or reverse the wrong action to the right one. Therefore, the company determines the following guidelines on receiving of gifts, assets or other interests. (The process of receiving gifts, assets or other interests in accordance with the annex 3.3): -

- 2.1 The employees can receive any gifts, assets or other interests on traditions, festivals or important days and on occasions as appropriate and traditionally, in order to keep a good relationship between organizations or persons. Such receiving shall be made with transparency. It must be ensured that the receiving will not affect or influence on decision making regarding the company's operation and business. Also, it shall not cause any risks of fraud, bribery or corruption.
- 2.2 The employees or the management shall receive any gifts, assets or other interests on behalf of the company and shall report such giving to their supervisors. The giving should be made in public or can be disclosed to the third party. In the event that the supervisor considers that it is inappropriate to receive such gifts, assets or other interests, the receiver shall return them immediately to the giver. If they cannot be returned, the employee shall report to the supervisor.
- 2.3 Upon receiving of gifts, assets or other interests, the director, the management and the employees shall give them to the operation department, and record register to be evidence for receiving, controlling and disbursement of gifts, assets or other interests within one day after receiving. The operation department shall gather the gifts and manage them for public interests.
- 2.4 In the event that consumer products, food, snacks or miscellaneous goods used as the giving company's media for public relations, the receiving department is allowed not to make and submit a report of giving/receiving of gifts, assets or other interests to the operation department. The receiving department has a discretion to manage, receive as personal gifts or distribute them within the department or to other departments.

3. Promotional Gifts from Purchases of Products and Services

The company recognizes that promotional gifts from purchases of products and services are tools for promoting products, encouraging customer acceptance, or incentivizing repeat purchases. The following guidelines are established for handling promotional gifts from purchases in accordance with annex 3.4:-

- 3.1 Upon any purchases in accordance with the procurement manual, if a seller intends to offer promotional gifts that are not of the same type as the purchased items, the department receiving

the gifts must forward them to the operation department. The operation department will record the gifts in a control register to serve as evidence of receipt, control, and disbursement of the gifts.

- 3.2 The operation department will store the promotional gifts mentioned above to be used as awards or gifts for employees on special occasions or company festivals.
- 3.3 For consumable gifts such as food, snacks, beverages, or items used for company promotion, the receiving department does not need to notify the operation department. The receiving department may use discretion to manage these gifts personally or distribute them within their department or to other departments.

4. Entertainment

The company realizes the importance of good relationship with its stakeholders. Therefore, the following guidelines on entertainment in accordance with annex 3.5 are specified: -

- 4.1 The expenses for business entertainment, such as food and beverage, sports and recreation activities, the other expenses directly relevant to the business operation or trade custom as well as the act of giving knowledge and understanding of business can be done with reasonable payment and without effects on the receiver's decision or conflicts of interest between companies, receivers or other relevant third parties.
- 4.2 The withdrawal of such payments can be made in writing by specifying names of the provider and the receiver of such entertainment as well as clear objectives. Then, the approval should be made in accordance with the company's authority regulations.

5. Prohibition of giving or receiving gifts, asset or other benefits and entertainment

The company determines the prohibition for the directors, the management and the employees on giving/receiving of gifts, assets or other interests and entertainment as follows: -

- 5.1 The directors, the management and the employees are not allowed to give/receive money, assets or other interests to/from any persons who have an intention to persuasively perform an operation, disregard duties or commit any actions in the scope of illegality and fraud, both to the face and behind the back.
- 5.2 The spouses, the children and the family members of the directors, the management and the employees are prohibited to operate or behave as an agent to give/receive gifts, assets or other interests in the form of cash, check, bond, stock, gold, jewelry, real estate or other similar things to/from any stakeholders involved in their cooperation with any government or private agencies in order to persuade decision making, perform or neglect to perform any actions which lead to improper operations and gain improper interests which might cause risks of giving/receiving bribes or corruption, to persuade decision making on business, or to cause incorrect and improper trading operation.

- 5.3 The directors, the management, the employees, their spouses, their children and their family members are not allowed to be an agent to offer giving/receiving of assets, objects or any other interests to/from those relevant to the business, government agencies or other organizations in exchange for improper privileges or to make a government official neglects to perform in accordance with the rules, regulations and laws.
- 5.4 The directors, the management and the employees are not allowed to organize entertainment or attend entertainment in order to ask for assistance or persuade decision making of government officials, partners or business agents or make influence over decision making on business.
- 5.5 It is prohibited to organize entertainment at the places in scope of sexual indecency and sexual services.

Charitable & Sponsorship Practice

The company has a policy to help, donate and support any charitable foundations or organizations; which shall be done on behalf of the company with clear, transparent and lawful objective, not in breach of morality and not causing damage to the overall society. Such donation or support must be proved irrelevant to reciprocal interests for any persons or organizations. This is except for any generally traditional declaration of honors, such as showing the corporate logo or announcing the company's name at a venue or on media for public relations. Also, such donation or support must not be a channel of corruption, indirect bribery or acquisition of business advantages. As a result, the company defines the guidelines on donation and sponsorship as follows: -

1. Charitable Practice

Charitable donation is an activity which might have risk of payment which can be claimed or a way for bribery or corruption. Therefore, to prevent donation with hidden objective, the company determines the guidelines on charitable donation as follows: -

- 1.1 The charitable donation is an act of donating money, objects or any other interests to a person or juristic person established as association, public foundation/organization, temple, hospital, educational institute, organization beneficial to the society, etc., according to the Provisions of Section 65 Ter (3) of the Revenue Code. (Please check from www.rd.go.th or with the Financial & Accounting Department.)
- 1.2 It is prohibited to donate or pay money directly to a government official or any persons, except that the letter of requesting donation clearly specifies such details and the written evidence of the donation is provided.
- 1.3 The charitable donation shall be proved that the activity is organized according to the charitable project's objective; the operation is supported to achieve the project's objective; the society actually receives interests; or the operation is done pursuant to the objective of social responsibility.
- 1.4 The charitable donation on personal behalf can be made, but not involves with or causes any questions whether it is a fraud for interests.

2. Sponsorship Practice

Sponsorship is a method of promoting the company's business, logo or reputation. Such sponsorship might have a hidden objective by using a charitable sport or charitable organization as puppets for business advantages. As a result, the company defines the guidelines on provider of sponsorship as follows: -

- 2.1 The sponsorship is an act of giving money or assets to a person, customer, business partner, association, foundation, charitable organization or non-profit organization with the objective to promote the company's brand or reputation which is beneficial to establishment of business creditability, strengthening of business relationship and appropriateness of opportunity.
- 2.2 The sponsorship shall not lead to any offers or promises to gain any interests relevant to bribery or corruption, in a direct or indirect manner.

- 2.3 In case of providing sponsorship for any projects, it must be proved that an operation is carried out to achieve the project's objective; the operation is lawful and not in breach of morality and tradition; and the operation does not persuade any persons to commit misconduct.
- 2.4 It is prohibited to pay money or provide assets directly to a government official or any persons, except that the letter of requesting sponsorship clearly specifies such details and the written evidence of the sponsorship is provided.

3. Approval Process

The process to request approval of charitable donation and sponsorship can be executed as appropriate, with the objective pursuant to the company's anti-corruption policy. The process is defined as follows: -
(The process to request for charitable donation and sponsorship is specified in the annex 4)

- 3.1 The department requesting money for charitable donation or sponsorship shall make a memorandum and propose it for approval in accordance with the company's authority regulations, stating a clear objective and attaching verifiable evidence.
- 3.2 In the event that a director makes a donation or provides sponsorship, informed by the director through the company secretary, the operation department shall handle the approval process in accordance with the company's authority regulations.
- 3.3 To request for approval, the following details and documents shall be presented: -
- Name of the requesting department
 - Name of the organization / place requesting for donation / sponsorship
 - Reason and necessity of request for donation / sponsorship
 - Start and end time of the activity
 - Value of the objects / money for donation / sponsorship
- 3.4 In case of supporting the donation / sponsorship with the company's products or assets, such products or assets should be efficient and usable; and shall be withdrawn in accordance with the company's operational process.
- 3.5 In case of supporting the donation / sponsorship with other objectives apart from the company's products or assets, the operation shall be carried out in accordance with the company's procurement regulations.
- 3.6 The department requesting money for charitable donation or sponsorship shall ask for a certificate of donation, receipt or any other documents from the agency or organization requesting for donation / sponsorship as evidence of the donation / sponsorship. A certificate of donation, receipt or any other documents as evidence of withdrawing money shall be submitted to the financial and accounting department to ensure that the donation / sponsorship is not used as a channel for corruption.

- 3.7 In the event that the company notices or gets information from a government agency that those receiving the donation / sponsorship commits corruption, the company will halt such support immediately.

Facilitation Payment Practice

The facilitation fee means a small amount of money unofficially paid to a government official. It is paid to encourage a government official to speed up any operations; and such operations do not require the discretion of government officials and must be done according to their duties and the rights of individual and juristic person such as applying for license, requesting certification and receiving public service. The company believes that such a small amount of money paid to a government official for convenient and fast contact with a government agency might be a channel for corruption in any further steps.

Therefore, the company has no policy to pay the facility fee to a government official in any case, because it might be a very high risk of bribery. Also, such actions discredit the company and violate its anti-corruption policy.

Revolving Door Practice (Hiring the government officer)

When any persons from the government sector work for the private section or any persons from the private section work on the government sector's policy, a risk of corruption occurs in terms of conflicts of interest of the persons who work for both of the organizations. A government official might have biased supervision; or personnel of the private sector might try to carry forward a policy beneficial to their organizations. To ensure that the company selects a person who worked as government official with transparency and accountability, not in return for any interests, the company defines the guidelines on hiring a government official as director, management, advisor, employee and subcontractor as follows:

1. The company has no policy to hire or allow a government official who still works for a government sector to work with.
2. If the company would like to hire or allow a former government official to work with, that person must have a minimum of two-year cooling-off period, counting from the date of leaving office of government official or organization which directly governs the company until the date of applying or being accepted as employee.
3. To hire or select a former government official to work with, the company must have a procedure to select, check his/her background, approve of hiring and determine remuneration in order to ensure that it is not in return for any interests or not for the company's interests which is risk of corruption. Then, the company sets the following guideline on nomination and selection of former government officials: -
 - 3.1 For the position of director, the company secretary shall check the candidate's data and report to the board of directors for consideration to approving the appointment. (Process of Hiring government officer to accordance with annex 5.1)
 - 3.2 For the position of management, advisor, employee and subcontractor, the human resource department shall check the candidate's data and report to the Chief Executive Officer through Chief Operating Officer for consideration to approving the employment. (Process of Hiring government officer to accordance with annex 5.2)
4. The personnel who is the former government official selected to serve as the company's director, management, employee, subcontractor or advisor must make Conflict of Interest Report (Report form in accordance with annex 1) to report his/her data relevant to the company's interest, according to the Conflict of Interest Practices.
5. Information regarding the hiring of government officials or employees must be disclosed in the company's annual report to ensure transparency.
6. The human resource department must be aware of the procedures for hiring government officials. If hiring a government official, state employee, or local politician, the process must be reviewed and approved before proceeding. Information about such hires should be disclosed according to the abovementioned approval and reporting procedures.

Part 3: Complaint, Investigation and Punishment

Practice of Whistle Blowing or the complaint of corruption

The company provides channels for whistleblowing any fraud or corruption, including the process of receipt, verification, conclusion and protection of the complainants and relevant persons who have been affected or possibly affected by such a fraud or corruption. The guidelines are formulated as follows: - (Process of Whistle Blowing and Investigation according to annex 6.1 and 6.2)

1. Eligible Whistleblower

A whistleblower can be

- 1.1 A director
- 1.2 Management
- 1.3 An employee
- 1.4 A stakeholder
- 1.5 Any person who witnesses or knows any clue about illegal action or possibly fraudulent and corrupt behavior in a direct or indirect way.

2. Scope of Reporting Whistleblowing or Complaints on Fraud and Corruption

Reports should be made if there is suspicion or observation of dishonest or non-transparent actions, or violations of good practices in the following areas:

- 2.1 Any gaps or opportunities for fraud and corruption within the company's policies, procedures, regulations, laws or governmental requirements
- 2.2 Misuse of authority for personal gain for oneself, family, friends, or associates, such as giving or receiving bribes or benefits from conflicts of interest, deceit, or neglect of company rules to achieve improper benefits
- 2.3 Destruction of documents, distortion, or concealment of information to facilitate fraud and corruption
- 2.4 Any actions, events, or information that might be related to fraud and corruption, or giving/receiving bribes
- 2.5 Impacts from reporting, assisting in investigations, or providing evidence related to fraud and corruption and bribery, including harassment, demotion, penalty, termination, or discrimination
- 2.6 Issues related to:
 - Political contributions
 - Giving or receiving gifts, assets, or other benefits, entertainment and reception
 - Donations and sponsorships
 - Facilitation payments
 - Hiring of government officials

For inquiries, consultations, or guidance on compliance with anti-corruption measures or bribery policies, employees can contact the human resource department, the legal department, or the internal audit department via their respective offices, phone, or email.

3. Reporting Whistleblowing or Filing Complaints

- 3.1 The company specified the process of reporting whistleblowing or filing complaints by requiring whistleblowers to submit their complaints in writing in accordance with Reporting Form in annex 2, either by filling out a form on the company website or by sending a written complaint through the designated reporting channels.
- 3.2 If a whistleblower wishes to remain anonymous, they must clearly state their intention in the written complaint. Protection under the non-disclosure procedure, in accordance with the privacy and confidentiality measures, will be provided, ensuring confidentiality. However, the complaint must include sufficient details or evidence to reasonably indicate the presence of corruption or bribery.
- 3.3 When filing a complaint through the company's website, the whistleblower must complete all required fields to enable the company to report back or provide updates on the status of the complaint.
- 3.4 Complaints submitted via the comment box will be reviewed by the human resource department in conjunction with the legal department every Monday by 12:00 PM. Complaints will be opened and examined collectively.

4. Whistleblowing Channels

Whistleblowers can report complaints or whistleblowing tips about corruption or misconduct through the following company channels:

4.1 Submitting written complaints to:

- 4.1.1 The chairman of the board of directors, a board director, either directly or through the company secretary
- 4.1.2 The chairman of the audit committee, either directly or through the secretary of the audit committee
- 4.1.3 The chief executive officer, either directly or through the secretary of the chief executive officer
- 4.1.4 The assistant manager of the legal department (company secretary) and the assistant general manager (operations)

4.2 Email address to:

- 4.2.1 The chairman of the audit committee via lawan.tha.2499@gmail.com
- 4.2.2 The chief executive officer via Yoshimura@yuasathai.com

- 4.2.3 The assistant manager of the legal department (company secretary) via peerasak@yuasathai.com and the assistant general manager (operations) via nattapat@yuasathai.com
- 4.3 Post to Chairman of the Board or Director or Chairman of Audit Committee or the legal assistant manager or the assistant general manager (Operation)
- Yuasa Battery (Thailand) Public Company Limited
164 Moo 5, Soi Thedsaban 55, Sukhumvit Road,
Tambol Taibanmai, Amphur Muangsamutprakarn,
Samutprakarn 10280
- 4.4 www.yuasathai.com under the section of whistleblowing
- 4.5 A complaint box in front of the Building 1 by joining Human Resources Department and Legal Department to open the box

5. Consideration of Complaints on Fraud or Corruption

To report any clue or complaint, the following details and documents shall be provided: -

- 5.1 First name–surname, position (if any), current address and a copy of ID card of the whistleblower or complainant for the company to report or explain the progress or inquire more information easily and promptly
- 5.2 If the whistleblower or informant believes that revealing their identity might jeopardize their safety or affect themselves or close associates, they are not required to disclose their identity. However, they must provide sufficient details or evidence to show reasonable grounds for believing that corruption or bribery has occurred.
- 5.3 Name and position (if any) of the complainee
- 5.4 Date, month and year of the incident, details of such clue or complaint on fraud or corruption which must be true and clear enough for further investigation
- 5.5 Any witness, evidence or object of corruption
- 5.6 Name of witness (if any)

The company will not accept complaints or whistleblowing on corruption or bribery in the following cases:

- 1) The whistleblowers do not provide their name-surname, position (if any), contact address, a copy of their ID card, and the name or position (if any) of the person being reported, or do not include clear and sufficient details or evidence showing reasonable grounds for believing corruption or bribery has occurred, especially if they choose not to disclose their identity.
- 2) The complaint which was completely inspected and considered under the Company's work regulations and without significant new evidence
- 3) The complaint which the complainee has been terminated from employment for more than one year

- 4) The fraudulent or corrupt action which was taken place over two years, counting until the date of reporting such a clue or complaint

6. Actions Taken after Receiving Complaints

Upon receiving a complaint, the recipient will do the followings:

- For complaints about employees at levels 0–11, forward the complaint to the human resource department to review with the legal department before presenting it to the chief executive officer for the appointment of an ad hoc committee.
- For complaints about employees at level 12 and above, as well as company directors, forward the complaint to the company secretary for presentation to the board of directors for the appointment of an investigative committee.

Practice of Data Disclosure and Confidentiality

To protect the whistleblowers, complainants, witnesses, informants and employees who refuse to cooperatively commit any fraud or corruption, the following guidelines on data disclosure and confidentiality are provided: -

- 1) The company will minimize access to confidential data.
- 2) The company will keep any document relevant to confidential transaction with safety. The documents will be destroyed if deemed unnecessary. The accessibility to such data is available only for the authorized persons.
- 3) The company will protect the complainants and the informants with good intent by concealing their names, addresses or data which can identify them. Their information shall be kept confidential and accessed only by the persons taking charge of investigating such a complaint.
- 4) The company will protect the whistleblowers, complainants, witnesses and informants from any trouble, danger or unfairness arising from reporting a clue, making a complaint, being a witness and giving information.
- 5) The company will not take any unfair action, including but not limited to change of job position, job description, workplace, job suspension, harassment, disturbance of operation and termination of employment, on the employees who refuse to participate in any fraud or corruption or those who cooperate with reporting any fraud or corruption.
- 6) Whistleblowers or individuals cooperating in fact-finding can choose to remain anonymous if they believe revealing their identity would cause them harm or danger. However, they must provide clear and sufficient details or evidence to indicate the presence of corruption, misconduct or a breach of laws, regulations, company policies, or business ethics.
- 7) The recipients shall keep the relevant information confidential and disclose when necessary only, considering security and damage of the complainants or those cooperate with verifying facts, source of information or relevant persons.
- 8) Those who have been damaged from any fraud or corruption will be remedied for damage with an appropriate and fair procedure.

Practice of Investigation, Inspection and Punishment

For the investigation, inspection and penalties to be in consistency with the whistleblowing as well as for fairness to all the employees, the following guidelines on investigation, inspection and penalties are provided: -

1. Investigation and Inspection Process

Upon receiving complaints from any channels, the human resource department and the company secretary will follow the procedures outlined in Annex 6.3 & 6.4 and proceed as follows:

1.1 If an employee at level 0-11 is complained:

- 1.1.1 The human resource department and the legal department determine that the complaint involves corruption; the legal department will forward the matter to the chief executive officer to appoint an ad hoc committee within three business days.
- 1.1.2 The ad hoc committee shall investigate, find facts, witnesses and evidence for inspection in the first place, as well as verify documents, complainants, informants and witnesses in order to get enough facts and evidence to consider whether there is the misconduct as complained or not within 15 days.
- 1.1.3 In the event that the ad hoc committee investigates and checks the facts, witnesses and evidence in the first place, and get inadequate information, witnesses and evidence to prove that there is a misconduct, the ad hoc committee shall make a report and ask the chief executive officer for closing the case, then inform the result to the complainant within three working days.
- 1.1.4 In the event that the ad hoc committee investigates and checks the facts, witnesses and evidence in the first place, and prove that there is a misconduct, the ad hoc committee shall submit a letter of allegation to the suspect or the complaine within three working days from the date of indicating grounds of misconduct. The date of informing the allegation shall be deemed the date of acknowledging the allegation. The complaine shall submit a letter to explain or appeal against the allegation together with showing or specifying any witness or evidence (if any) to the ad hoc committee within 15 days from the date of acknowledging the allegation.
- 1.1.5 The ad hoc committee's allegation shall be inspected and proved within 60 days from the date of indicating grounds of misconduct.
- 1.1.6 In the event that the allegation cannot be investigated to gather facts, witnesses and evidence or inspected within the specific time as defined in no. 1.1.5, the chair of the ad hoc committee shall report to the chief executive officer to ask for extension of inspection period. Two extensions are allowed with a maximum of 15 days per each time.
- 1.1.7 In the event that the ad hoc committee cannot perform the inspection within the specific time without informing any reason to ask for extension of inspection period, it is deemed that the

ad hoc committee fails to comply with this anti-corruption policy. The chief executive officer has the discretion to expedite the case.

- 1.1.8 In the event that the ad hoc committee inspects and considers that the suspect is innocent or there is some misunderstanding, the ad hoc committee shall report the result to the chief executive officer and ask for closing the case, then inform the result to the complainant within three working days. The chief executive officer shall order the human resource department to close the case and inform the complainee.
- 1.1.9 In the event that the ad hoc committee inspects and considers that the suspect is guilty, the ad hoc committee shall report the result to the chief executive officer to ask for approval of any disciplinary action and/or legal proceedings (if any) within 10 working days, then inform the result to the complainant within three working days. The chief executive officer's decision is final.
- 1.1.10 In the event that a complainee is guilty, the ad hoc committee shall inform in writing the result of punishment to the human resource department for proceeding the penalty.
- 1.1.11 The following details shall be stated in a report of inspection and complaint outcome: -
 - (1) Complainee's name and position
 - (2) Complaint's subject
 - (3) Complaint and conclusion of facts
 - (4) Reason of determining the outcome
 - (5) Conclusion of opinions on the complaint
- 1.1.12 The human resource department will notify the receipt of the complaint and the investigation results through the secretary of the audit committee and the secretary of the corporate governance committee for reporting to the respective committees.

1.2 If an employee at level 12 upward to the director is complained:

- 1.2.1 When the company's secretary receives the complaint of employee in level 12 upward to the director from Human Resource Department or legal Department already, the company secretary shall make a report of the complaint to the chair of the board to submit a circular letter to the board of directors, asking for appointment of an investigation committee within three working days to take charge of the investigation.
- 1.2.2 Upon receipt of the circular letter, the board of directors shall vote for appointment of the investigation committee and submit the letter back to the company secretary within three working days. The investigation committee, consisting of a minimum of three voted directors and the company secretary as the secretary, has authority to carry out an investigation, fact finding and inspection to gather witnesses and evidence or prove the alleged misconduct, and report the result of the inspection to the board of directors.

The investigation committee might assign any person to investigate, check facts and inspect in order to gather witnesses and evidence for the investigation committee to consider the alleged misconduct.

- 1.2.3 The investigation committee or the authorized deputy shall investigate, find facts, witnesses and evidence for inspection in the first place, as well as verify documents, complainants, informants and witnesses in order to get enough facts and evidence to consider whether there is the misconduct as complained or not within 15 days.
- 1.2.4 In the event that the investigation committee investigates and checks the facts, witnesses and evidence in the first place, and get inadequate information, witnesses and evidence to prove that there is a misconduct, the authorized deputy, on behalf of the investigation committee, shall make a report and submit a circular letter to ask the board of directors for closing the case, then inform the result to the complainant within three working days.
- 1.2.5 In the event that the investigation committee investigates and checks the facts, witnesses and evidence in the first place, and prove that there is a misconduct according to the anti-corruption policy, the investigation committee shall submit a letter of allegation to the suspect or the complainee within three working days from the date of indicating grounds of misconduct. The date of informing the allegation shall be deemed the date of acknowledging the allegation. The complainee shall submit a letter to explain or appeal against the allegation together with showing or specifying any witness or evidence (if any) to the investigation committee within 15 days from the date of acknowledging the allegation.
- 1.2.6 The investigation committee's allegation shall be inspected and proved within 60 days from the date of indicating grounds of misconduct.
- 1.2.7 In the event that the allegation cannot be investigated to gather facts, witnesses and evidence or inspected within the specific time as defined in no. 6, the chairman of the investigation committee shall report to the chairman of the board to ask for extension of inspection period. Two extensions are allowed with a maximum of 15 days per each time.
- 1.2.8 In the event that the investigation committee cannot perform the inspection within the specific time without informing any reason to ask for extension of inspection period, it is deemed that the investigation committee fails to comply with this anti-corruption policy. The chairman of the board has the discretion to expedite the case.
- 1.2.9 In the event that the investigation committee inspects and considers that the suspect is innocent or there is some misunderstanding, the investigation committee shall report the result to the chairman of the board to ask for closing the case, then inform the result to the complainant within three working days. The company secretary shall close the case and inform the complainee
- 1.2.10 In the event that the investigation committee inspects and considers that the suspect is guilty, the company secretary shall submit a circular letter of the result to the board of directors or

summon a board of directors meeting, as necessary and appropriate, to ask for approval of the disciplinary action and/or legal proceedings (if any) within 10 working days, then inform the result to the complainant within 3 days. The board meeting's resolution is final.

1.2.11 The company secretary shall make a letter to the chairman of the board to sign on the order of punishment.

1.2.12 The following details shall be stated in a report of inspection and complaint outcome: -

- (1) Complainee's name and position
- (2) Complaint's subject
- (3) Complaint and conclusion of facts
- (4) Reason of determining the outcome
- (5) Conclusion of opinions on the complaint

2. Report of Complaint Outcomes

The company shall make a report of complaint outcomes at least once a year. The Summary Report of Anti-Corruption Policy Violation shall be made according to annex 2.6.

2.1 If the complainee is an employee at level 0-11, the human resource department shall submit such a report to the secretary of the corporate governance committee for proposing it to the corporate governance committee.

2.2 If the complainee is an employee at level 12 upward to the director, the company secretary shall make such a report and propose it to the board of directors.

3. Damage Remedy Measures

The persons who have been damaged from whistleblowing can request for damage remedy under the following measures: -

3.1 Such a person can request for damage remedy upon submission of the complaint or before the end of the inspection. Such a damage remedy cannot be requested later.

3.2 Such a person shall file a written request for damage remedy to the ad hoc committee or the investigation committee, as the case may be, with the following details: -

- Name of the person who has been affected
- Incident
- Impact
- Damage remedy measure
- Evidence

Those who have been affected will not gain remedy in the event that the ad hoc committee or the investigation committee, as the case may be, considers such persons involve with any support for violation of the anti-corruption policy.

4. Penalties

The company realizes the importance of anti-corruption. Any action in breach of the anti-corruption policy is deemed guilty. Some penalties are defined as follows: -

- 4.1 In the event that a suspect commits any fraud or corruption and violates any of these anti-corruption guidelines, it is deemed in breach of the anti-corruption policy. The suspect shall be punished with any disciplinary action according to the company's work regulations. In the case that such a fraud or corruption is unlawful, the wrongdoer shall be punished with any legal penalty.
- 4.2 All the directors, the management, the chief executive officer and the employees shall strictly comply with the anti-corruption policy. In case of violating the anti-corruption policy, such a director or employee is deemed in breach of the work regulations and shall be punished with a disciplinary action fairly and uniformly without discrimination on position, duty, employee level and gender.
- 4.3 In the event that a representative, middleman, distributor/service provider or contractor violates any of these anti-corruption policies, the company will immediately consider terminating the business with such a person.
- 4.4 If an investigation finds that the complaint is unfounded and the informant intended to harass the accused, the ad hoc committee or the investigative committee, as appropriate, may recommend disciplinary action to the chief executive officer or the board of directors, as appropriate, for disciplinary measures.

5. Punishment

In the event that the ad hoc committee or the investigation committee considers the suspect is guilty, some penalties to the wrongdoer shall be considered uniformly, regardless of employee level, as follows: -

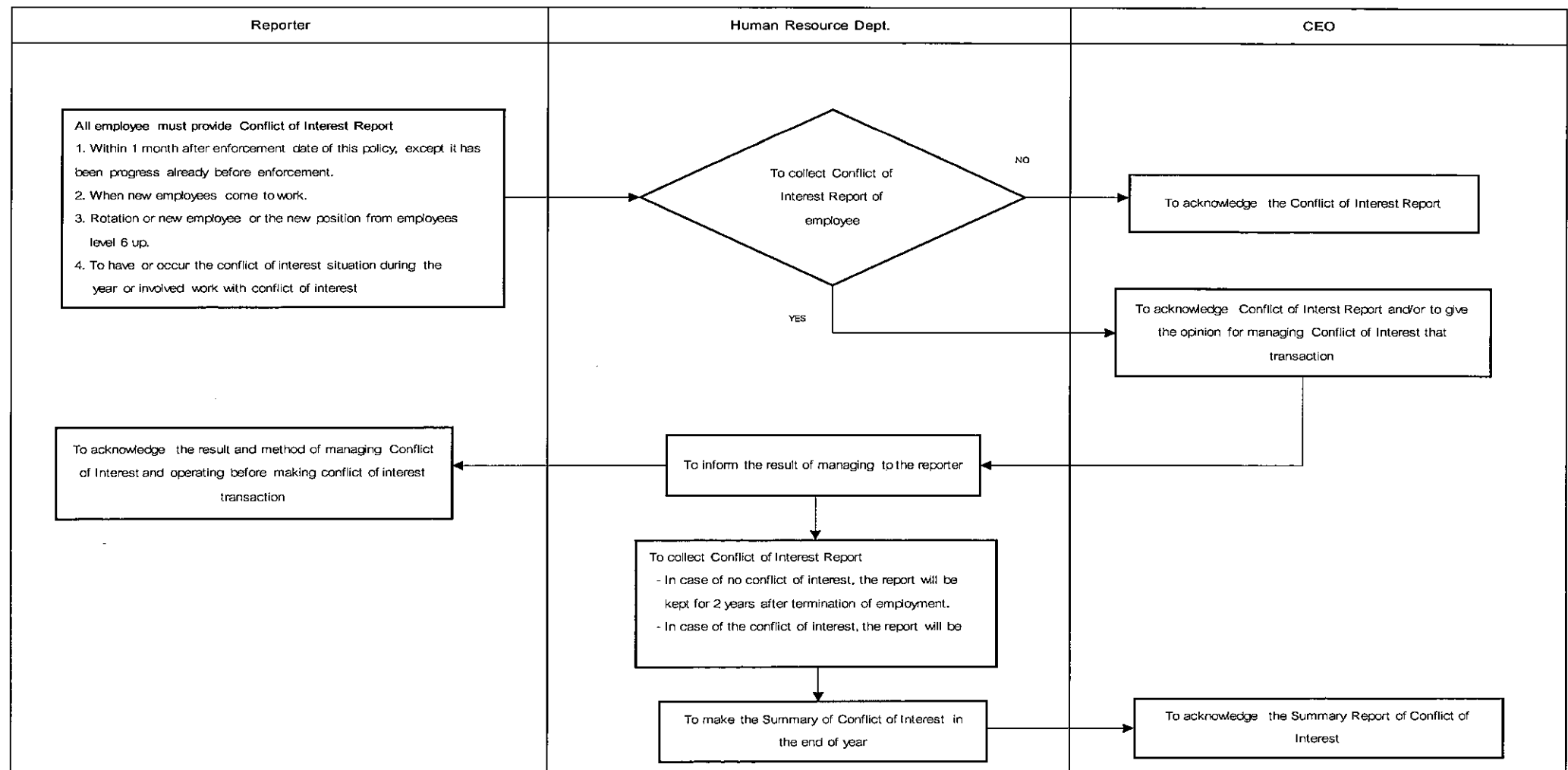
- 5.1 If an employee at level 0-11 is a wrongdoer,
The chief executive officer has authority to consider a penalty which is proposed by the ad hoc committee according to the company's work regulations and the Labor Protection Act B.E. 2541 (2008). In the event that such a misconduct is unlawful, legal proceedings might be considered as well.
- 5.2 If an employee at level 12 upward to the director is a wrongdoer,
The board of directors has authority to consider a penalty which is proposed by the investigation committee according to the company's work regulations, mutatis mutandis. In the event that such a misconduct is unlawful, legal proceedings might be considered as well.
- 5.3 The complaint outcomes and the penalties to any complainee, considered by the chief executive officer or the board of directors, as the case may be, are final.

Annex: Flowchart of Practice and Report Form

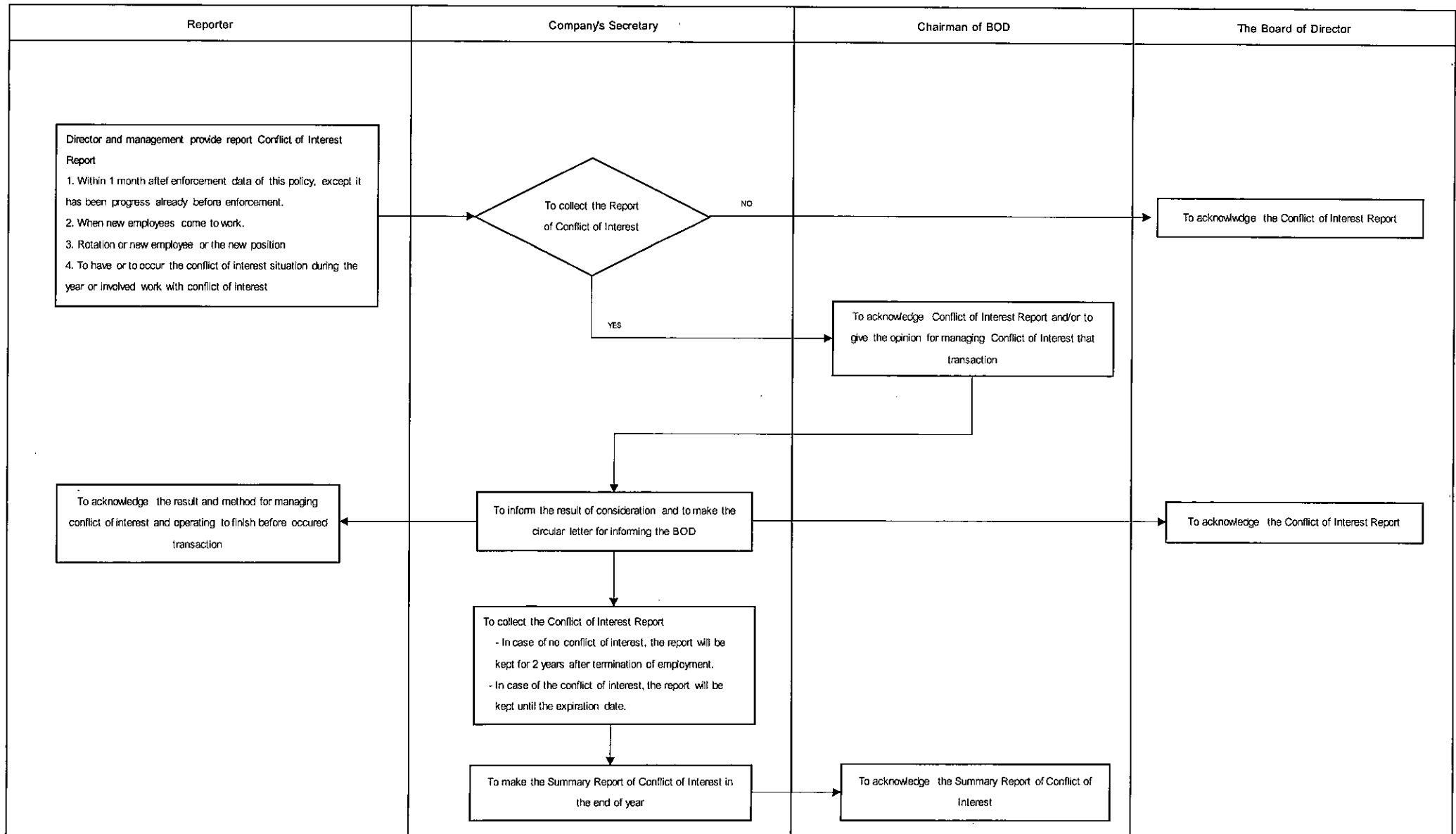
Flowchart

1. Process of Conflicts of Interest Report

1.1 Process of Conflicts of Interest Report of employee in level 0 - 11

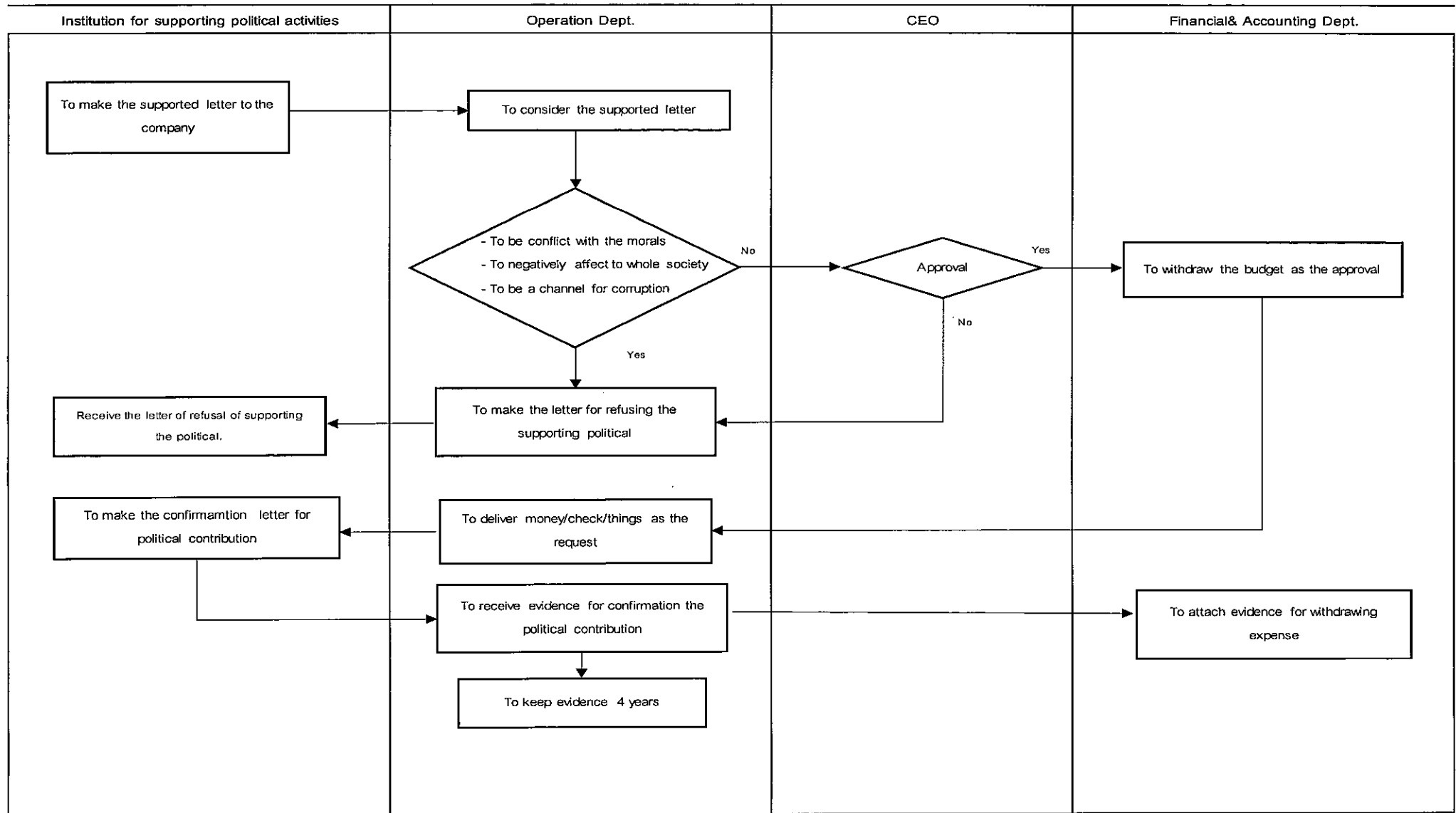


1.2 Process of Conflicts of Interest Report of employee in level 12 upward to the director



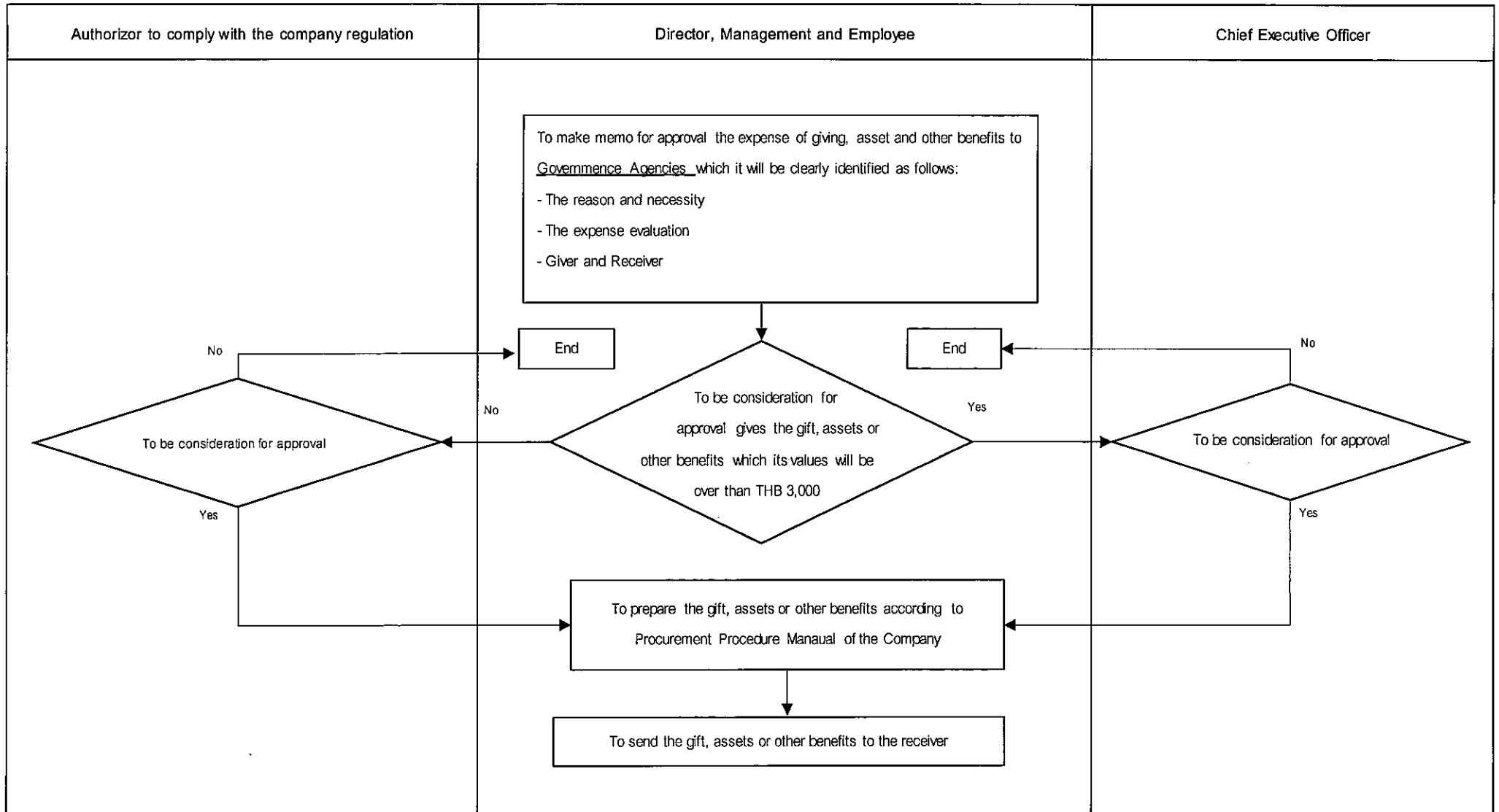
2. Process of Political Contribution Practice

2. Process of Political Contribution

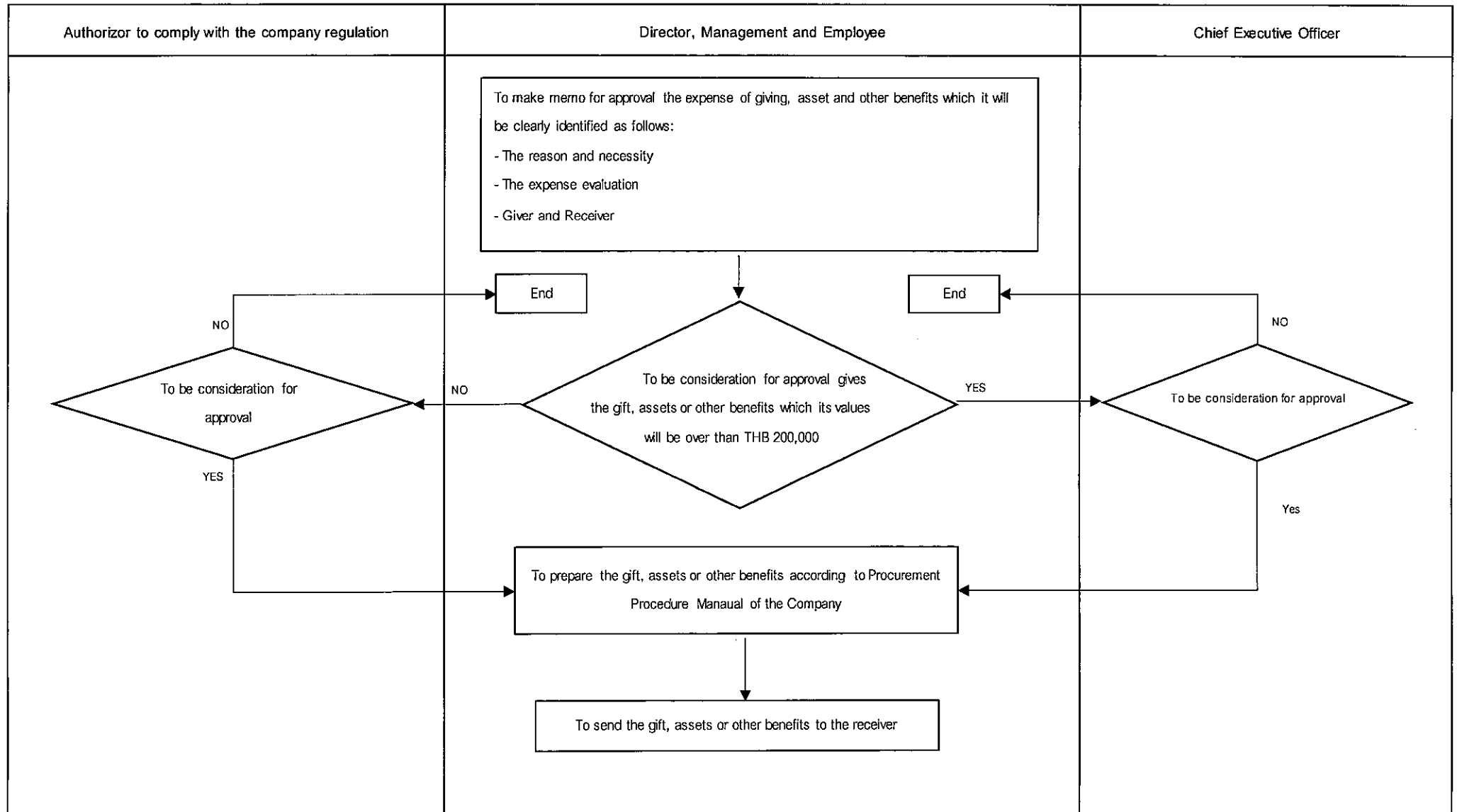


3. Process of No Gift

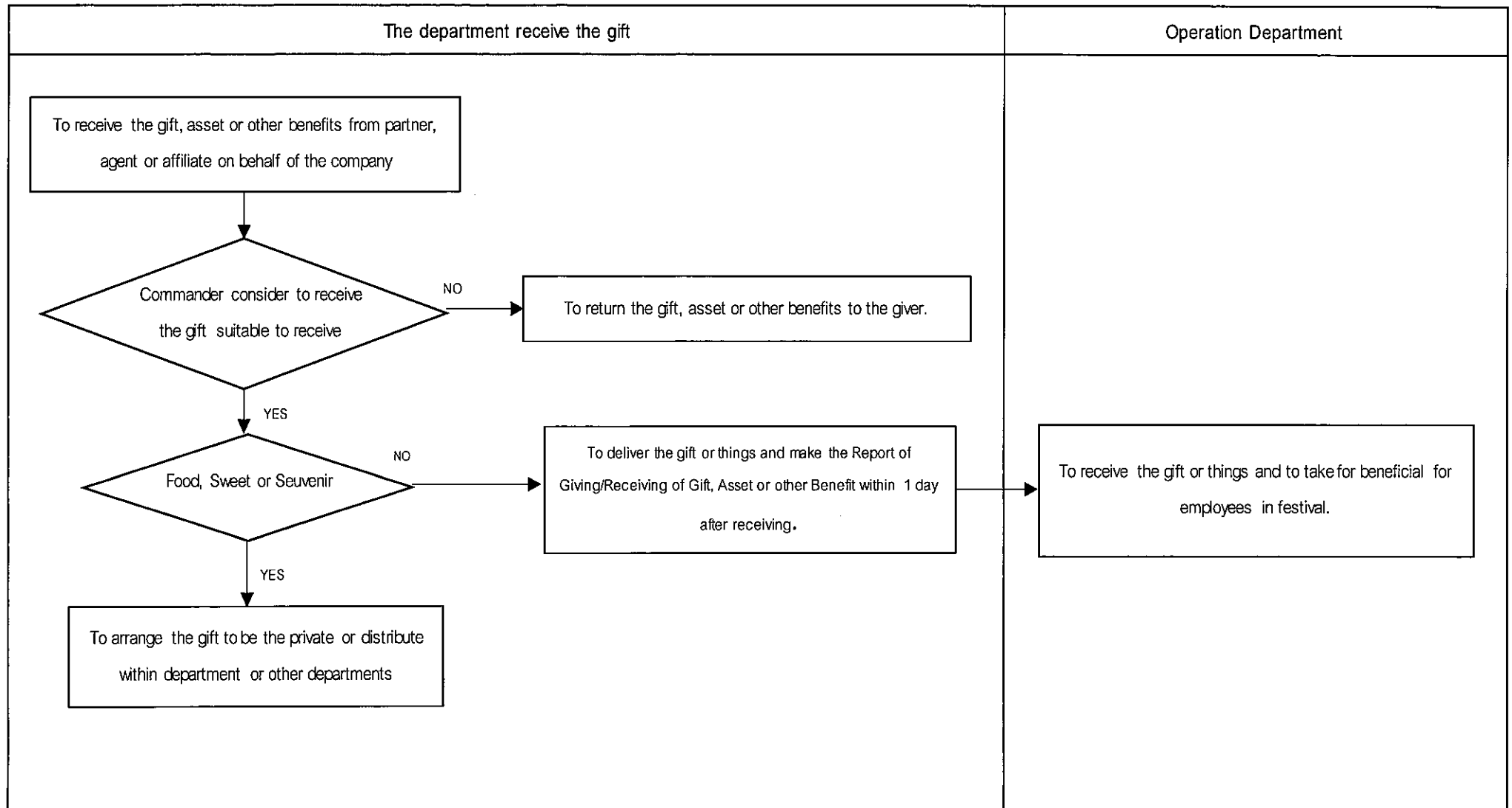
3.1 Process of giving the gift, asset or any benefits (In case that the receiver is the government sector)



3.2 Process of giving the gift, asset or any benefits (In case that the receiver is the private sector)

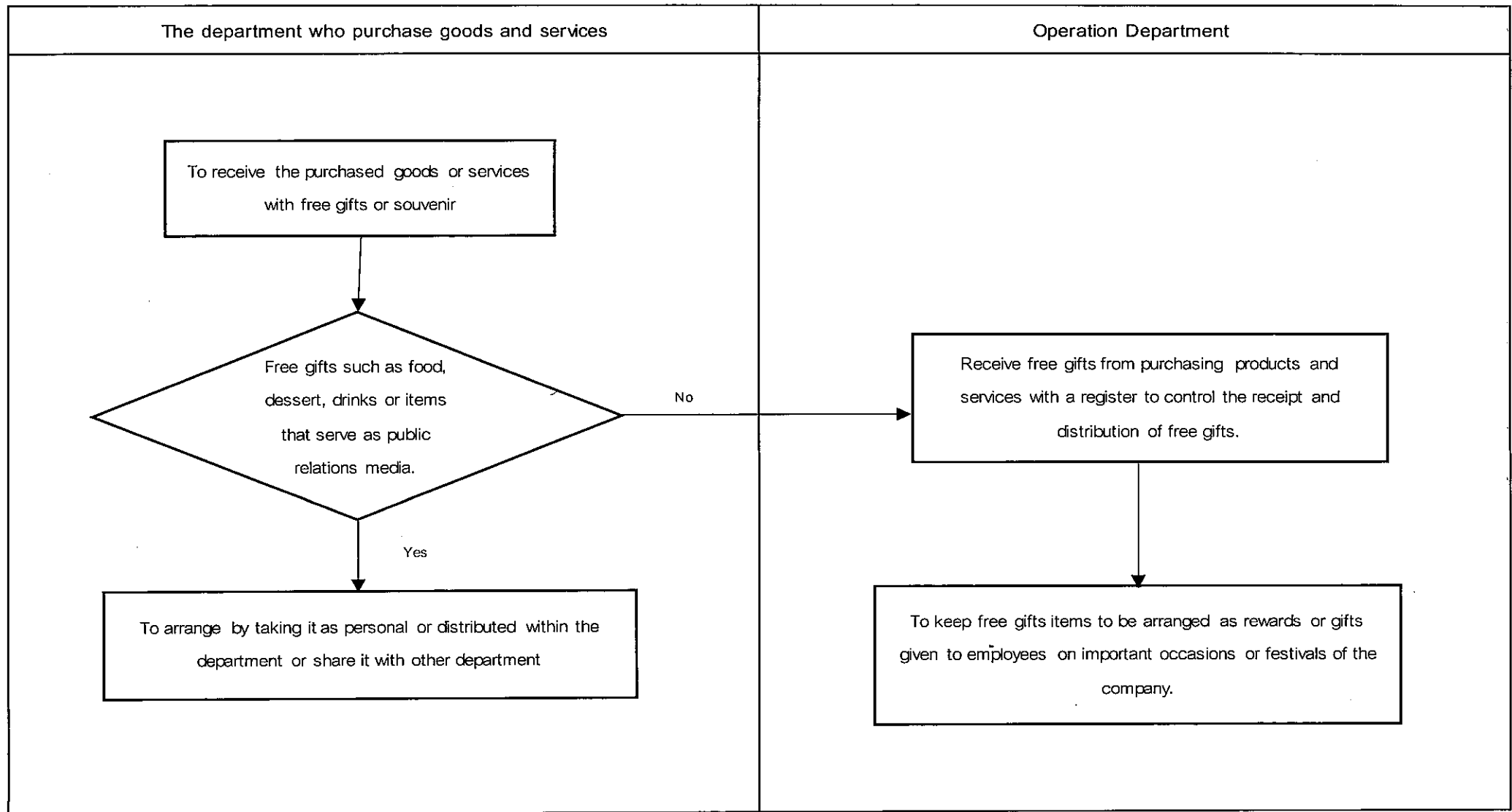


3.3 Process of receiving the gift, asset or any benefits

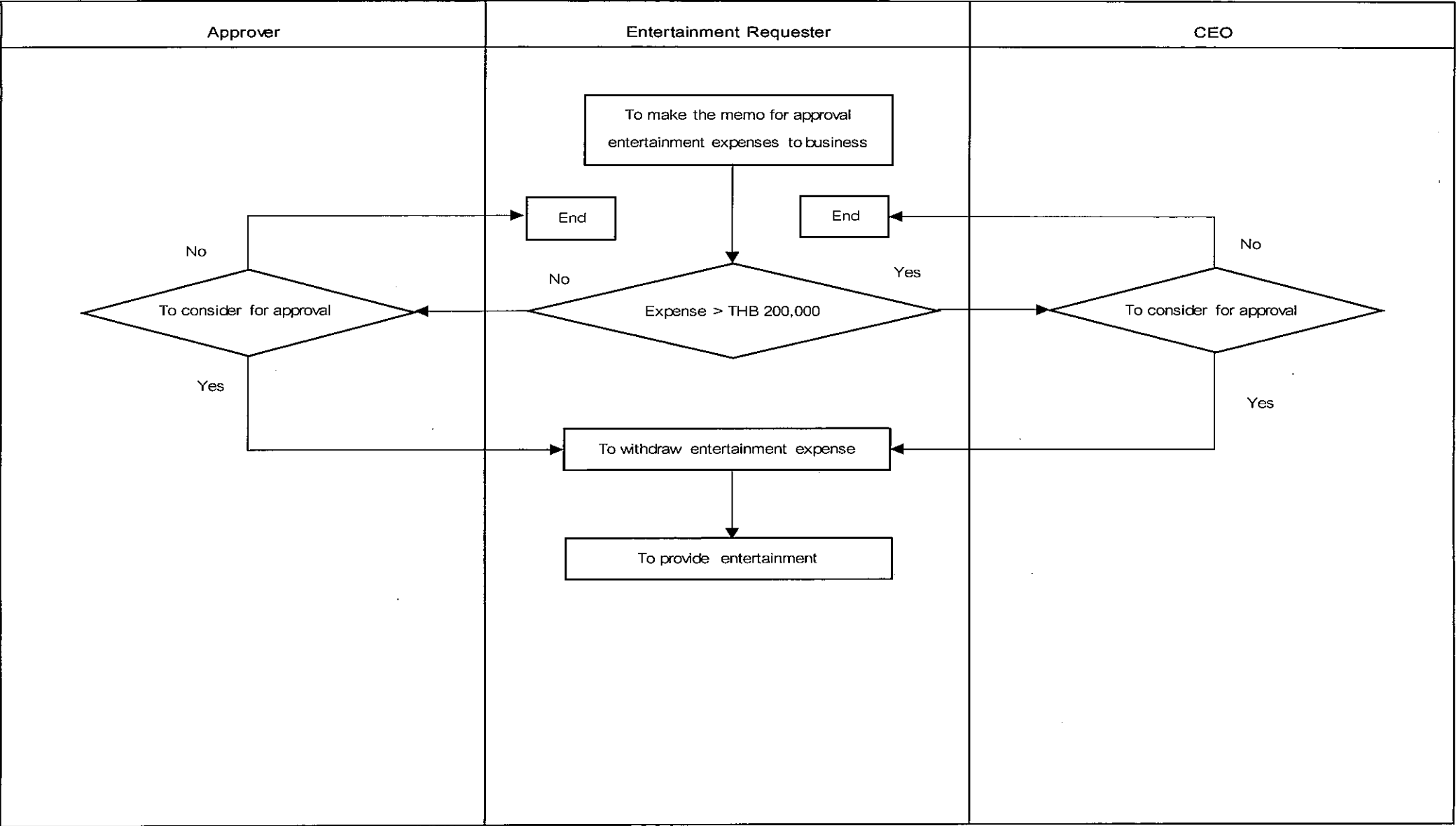


Dame

3.4 Process of receiving the promotion gifts or souvenir from purchasing goods and services

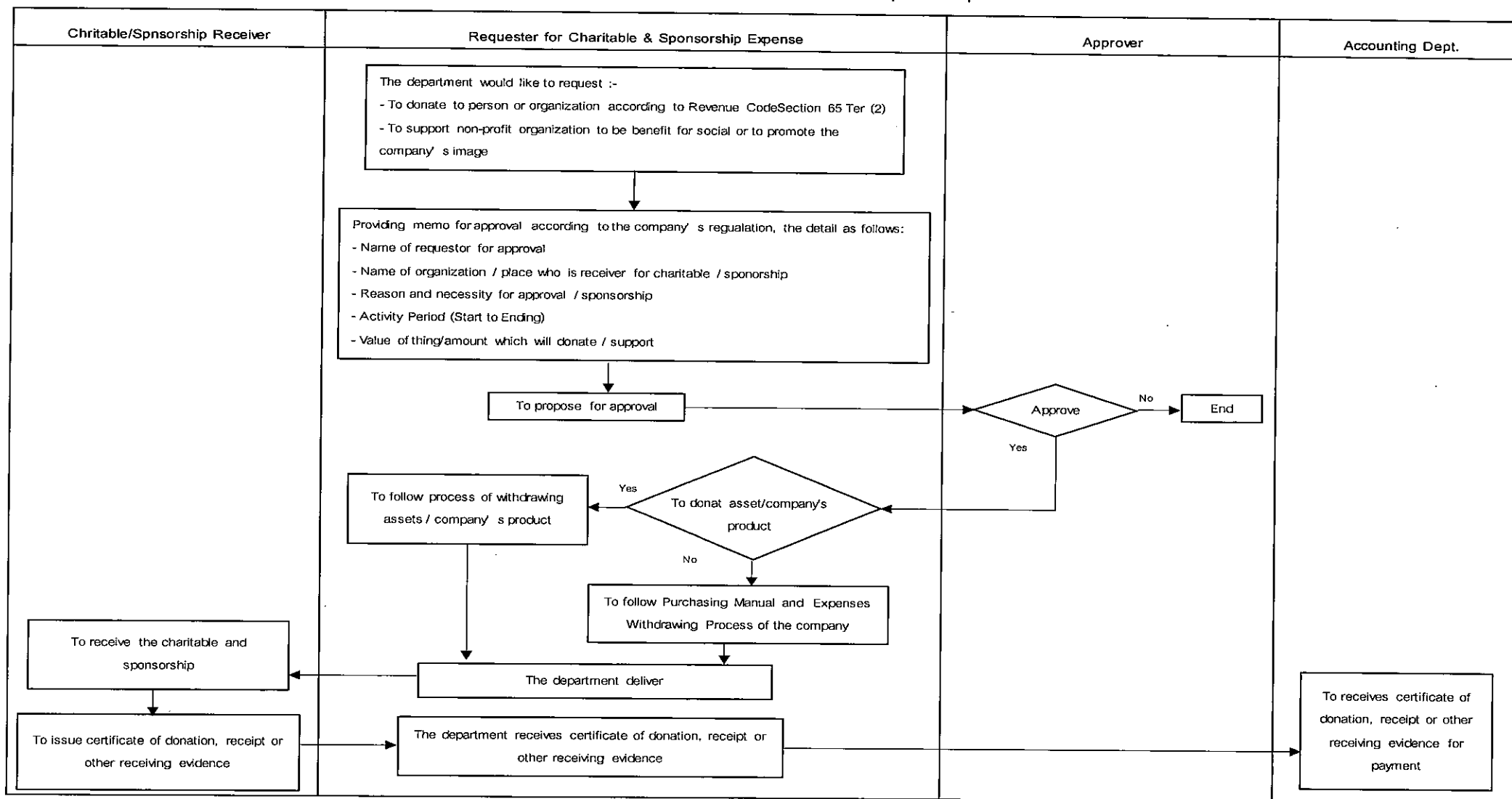


3.5 Approval Procedure for entertainment



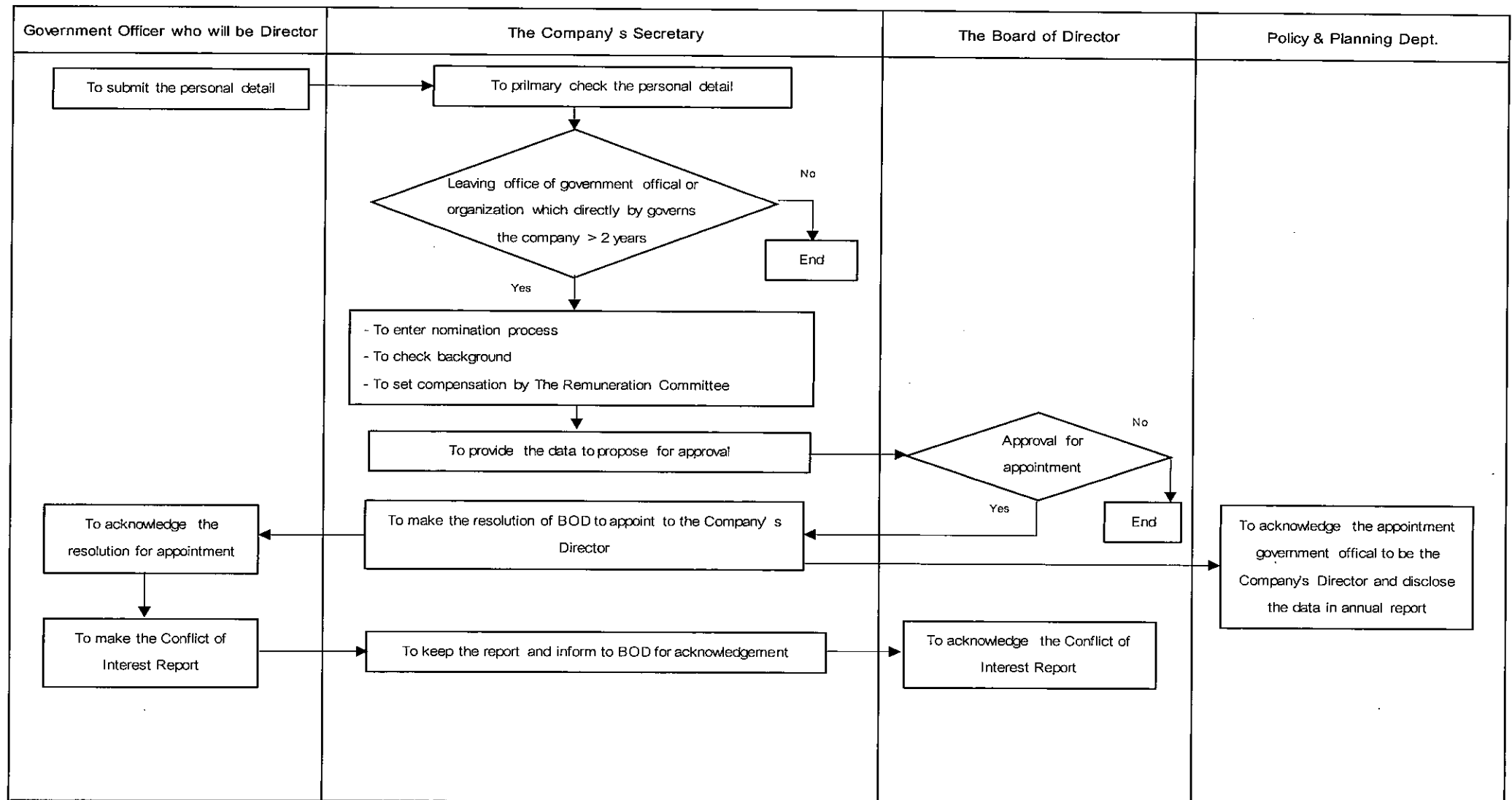
4. Approval Process for Charitable or Sponsorship Contribution

1.4 Approval Process for Charitable and Sponsorship

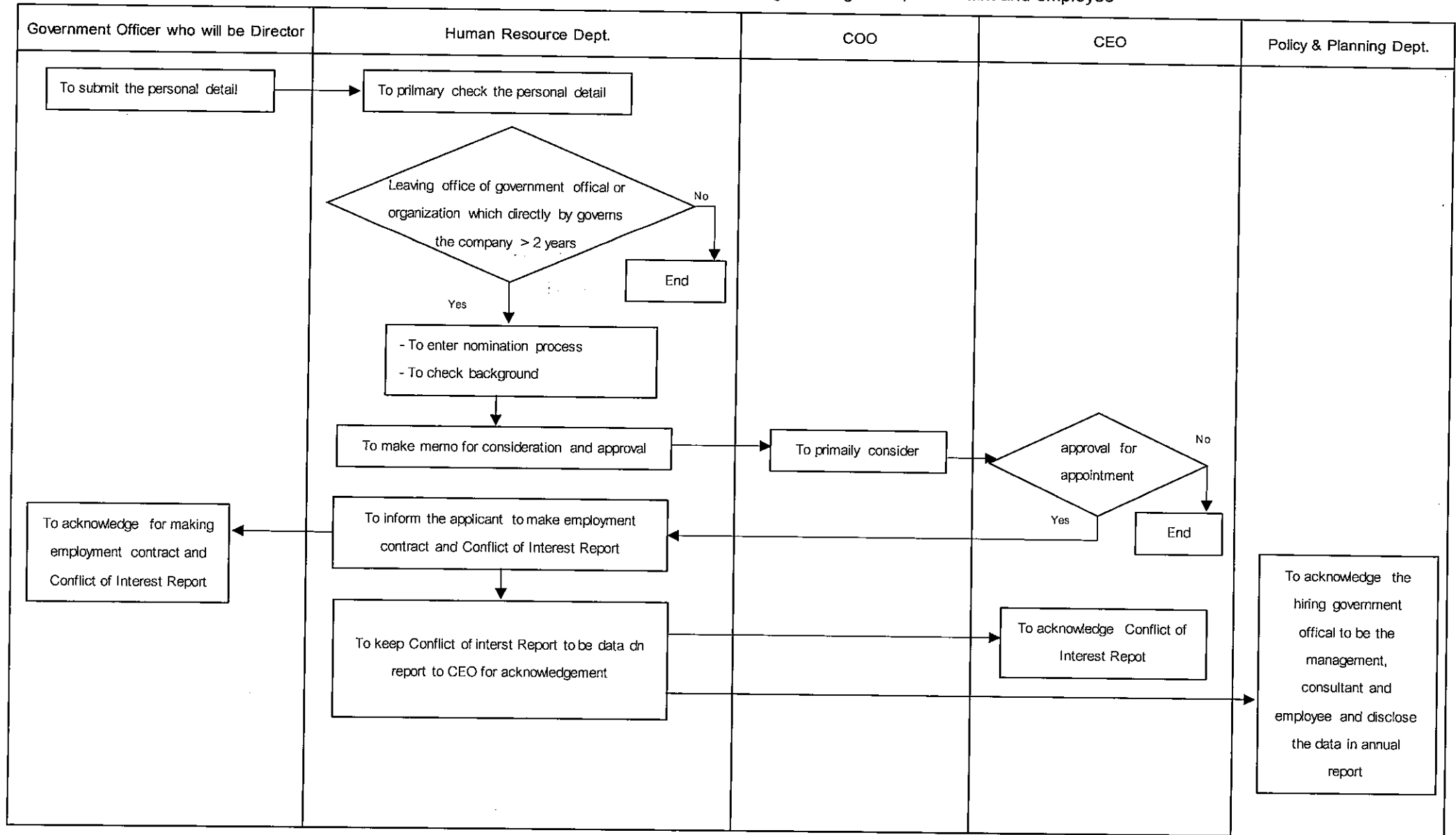


5. Process of Hiring the government officer

5.1 Process of Hiring the government officer in-charge Director

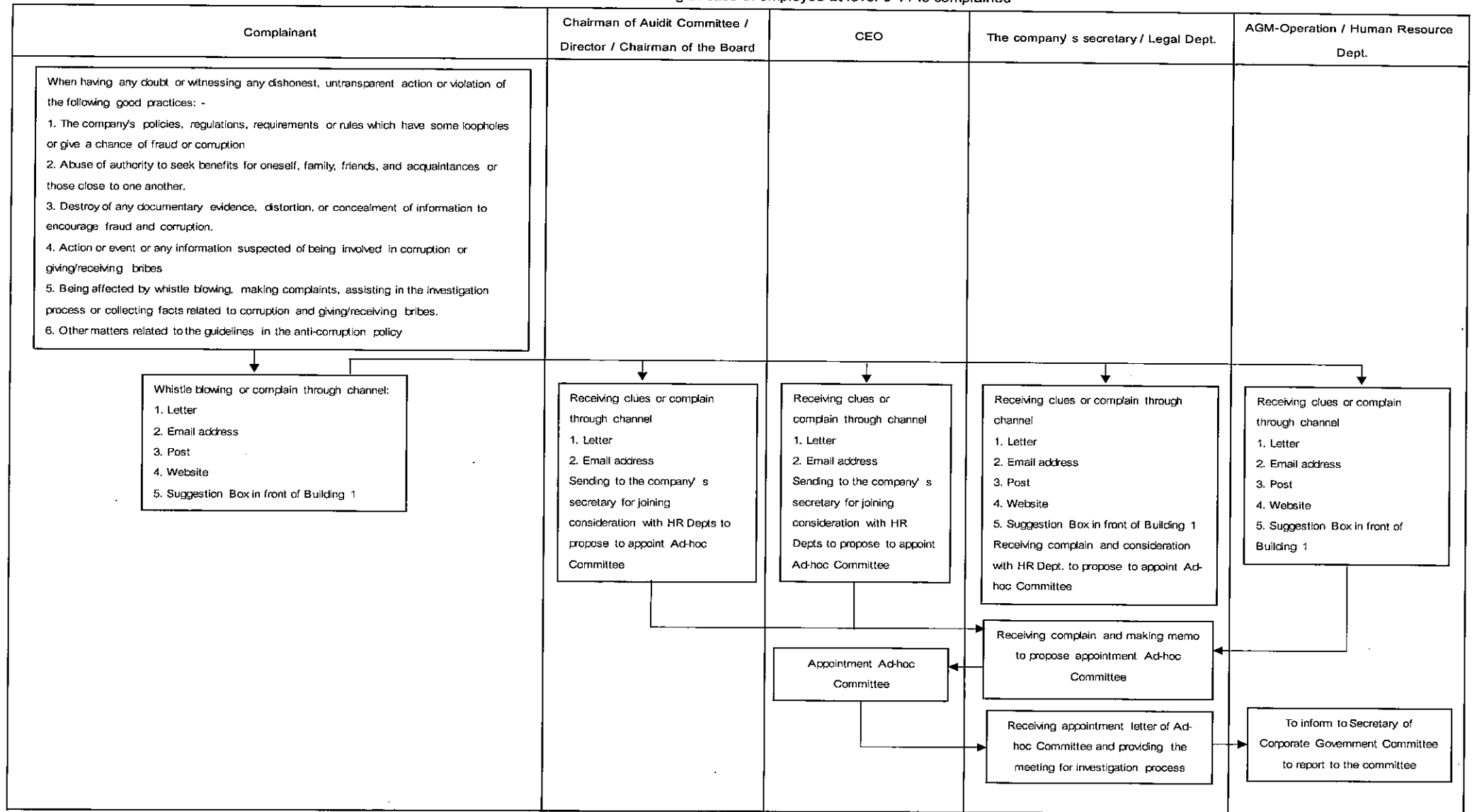


5.2 Process of Hiring the government officer in-charge management, consultant and employee

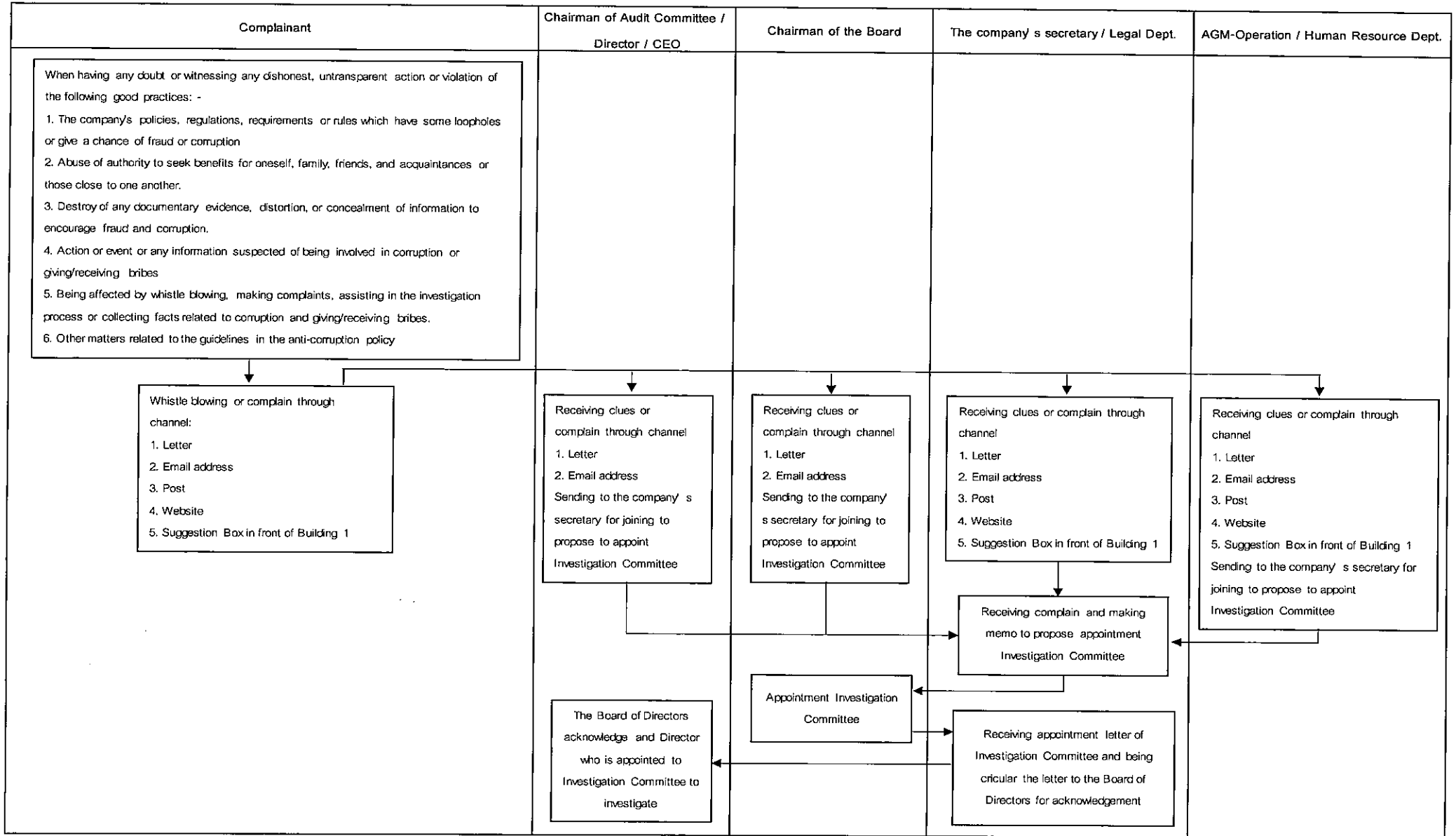


6. Process of Whistle Blowing and Investigation

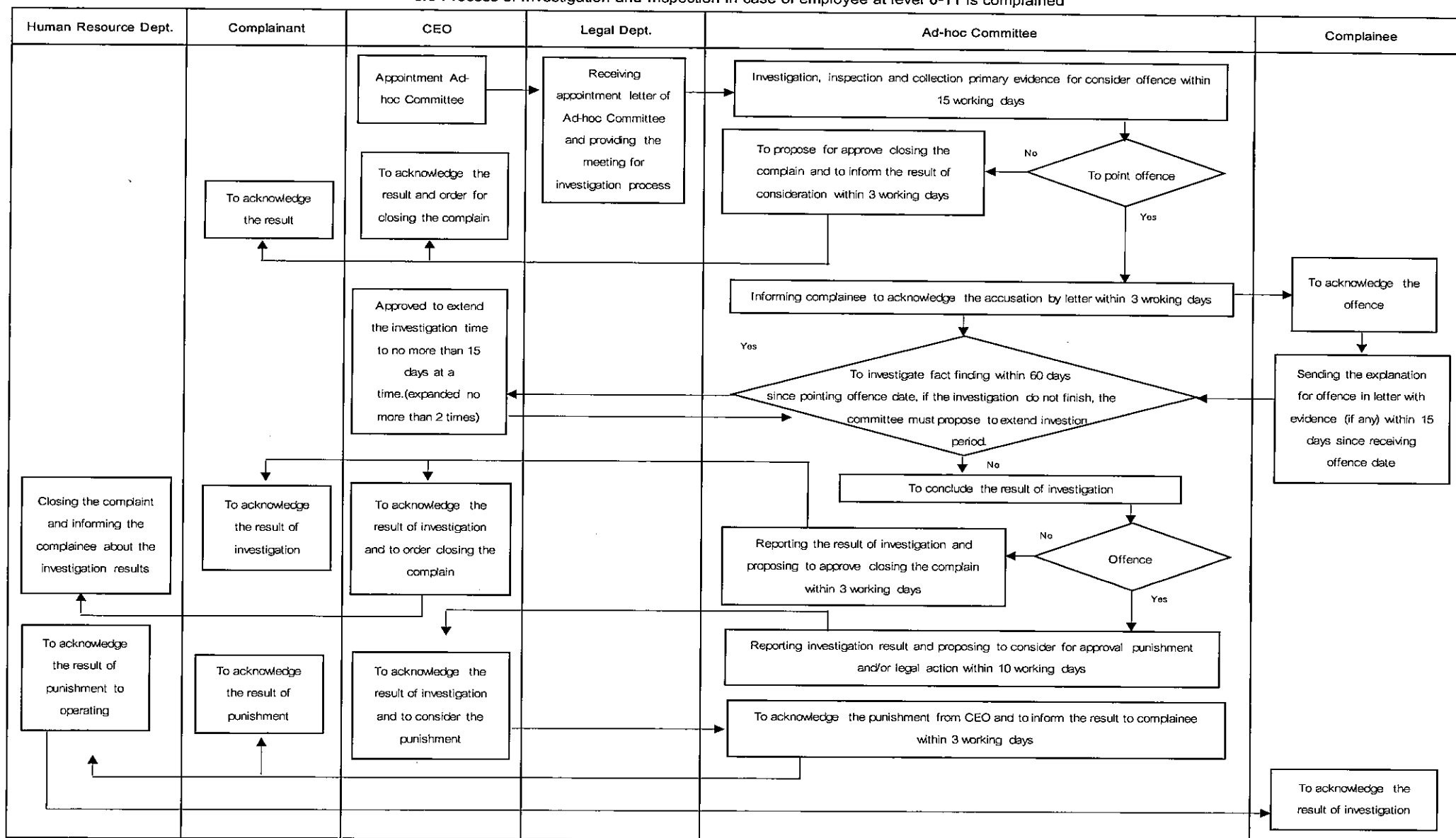
6.1 Process of Whistle Blowing in case of employee at level 0-11 is complained



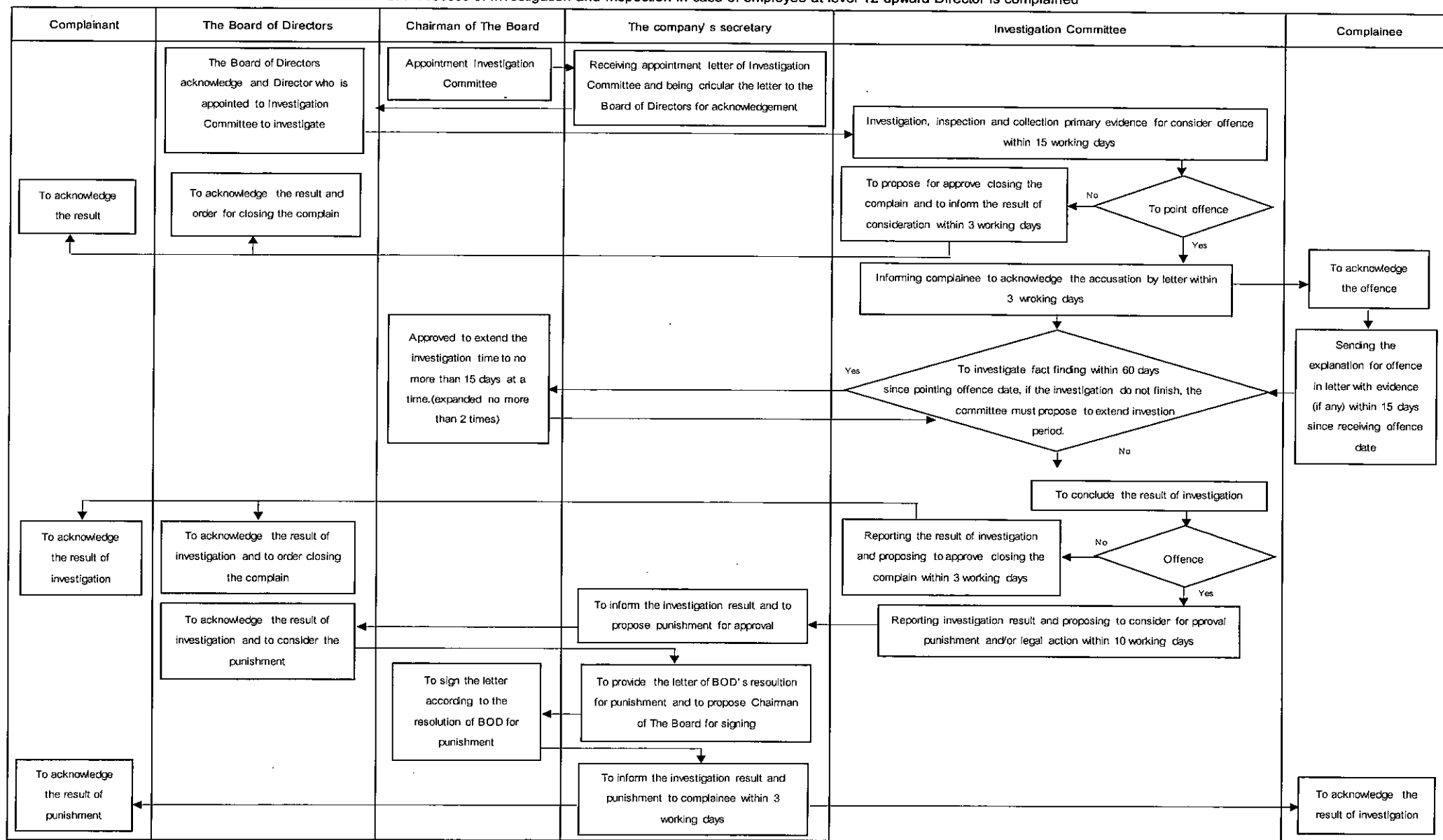
6.2 Process of Whistle Blowing in case of employee at level 12 upward Director is complained



6.3 Process of Investigation and Inspection in case of employee at level 0-11 is complained



6.4 Process of Investigation and Inspection in case of employee at level 12 upward Director is complained



Reporting Form

1. Conflict of Interest Report

Conflict of Interest Report

I.....Position.....

Department.....would report conflict of interest transaction in case that:

☐ Changing the position or receiving the new position

☐ the situation or involved with work to have conflict of interest

I would like to report that ☐ I have not any conflict of interest.

☐ I have conflict of interest so that.....

.....
.....

Thus, I have solved the problem as follows:

.....
.....

I certify that the above information is correct and true in every aspect.

Please be informed.

Signature.....

()

Position.....

Date.....

Opinion's

.....
.....

Signature.....

()

Position.....

Date.....

2. A Form of Corruption Complaint

A Form of Corruption Complaint

At.....

Date.....

To

Name.....Age.....Years old Level.....

Position.....Section.....Address.....Moo.....

Road.....Sub-District.....District.....

Province.....Tel.....

Complainee's Name.....Level.....

Position.....Section

Subject of Complaint

.....

.....

Details of Complaint

.....

.....

.....

.....

.....

.....

.....

.....

.....

I confirm that all the above statement is true and correct, therefore, I hereunder sign as evidence.

Signature.....Complainant

(.....)

Dual