



Anti-Corruption Policy and Guidelines

Anti-Corruption Policy

TPBI Public Company Limited and its subsidiaries (the "Group") have the objective and commitment to conduct business with importance attached to anti-corruption, and are committed to complying with the laws on the prevention and countering of fraud and corruption, the giving or receiving of bribery to or from government officials both domestically and internationally, or officials of private sector agencies, as well as supporting and encouraging personnel at all levels to have an awareness of anti-corruption in all forms.

The Board of Directors has therefore arranged for the preparation of this policy, regarding it as part of the Corporate Governance Policy of the Group, in order to provide assurance that the Group's practices are consistent with the policy established, as well as for directors, executives, employees, workers, and any persons acting for the benefit of the Group to adhere to this policy as a standard in the performance of work, and it is regarded that any act not in accordance with the Group's policy shall be subject to disciplinary punishment and to penalties under relevant laws.

Definitions

Fraud means any act to seek benefits that should not lawfully be obtained, for oneself or others, including embezzlement, the dressing up of accounts, and corruption.

Corruption means any act, whether the offering, the giving of a promise, the requesting, the demanding, or the giving or receiving of property or any other benefit, to or from government officials or any other persons doing business with the Company, whether directly or indirectly, in order that such persons perform or refrain from performing their duties, or in order to obtain or retain any other benefit that is improper in business, except in cases where the law, rules, regulations, local customs and traditions, or trade practices permit it to be done.

Bribery means the offering, the giving of a promise, the giving, or the receiving of money, property, or any other benefit to or from a person, whether directly or indirectly, in order to influence the decision of another person, or to induce that person to act or refrain from acting so as to bring about a breach of the law, the avoidance of compliance with the law, rules, regulations, or good morality, including the rules, regulations, and work practices of the Company.

Giving or Receiving of Gifts means the giving or receiving of money, objects, remuneration, or any benefits.

Entertainment and Hospitality means expenditure for business entertainment, such as entertainment in the form of food and beverages, entertainment in the form of sports, and other expenditure directly related to business practices or constituting a trade practice, including the provision of business knowledge and understanding.



Donations and Support means the provision of financial support, products, or services to a person requesting support or requesting a donation, with the objective of undertaking public benefits for society, or promoting the business and the good image of the Group.

Political Assistance means the giving of property, money, objects, rights, or any other benefit in order to assist or support, or for any other benefit to, a political party, a politician, or a person having political duties, as well as political activities, whether directly or indirectly.

Conflict of Interest means any act that would cause oneself to have an interest or a conflict of interest with the Group, whether arising from dealings with the Group's trade-related parties, or from the use of opportunities or information obtained by virtue of being an employee for personal benefit, and from conducting business in competition with the Group, or undertaking other work outside the Group's work that affects the work of one's duties.

Facilitation Payment means a small expense paid to a government official unofficially, given merely to ensure that the government official will carry out a process, or to prompt more rapid action, where such process does not require the exercise of discretion by the government official and is an act proper to the duties of that government official, as well as being a right that the juristic person is already entitled to under the law, such as applying for a license, applying for a certificate, and receiving public services.

Government Employee means a person holding a political position, a government official, or a local employee with a permanent position or salary; an employee or a person working in a state enterprise or a government agency; a local administrator and a member of a local assembly who is not a person holding a political position; an official under the law on local administration; and shall include directors, subcommittee members, and employees of government agencies, state enterprises, or government agencies, and a person or group of persons exercising authority, or authorized to exercise the administrative authority of the state, in undertaking any matter under the law, whether established within the government system, a state enterprise, or another undertaking of the state.

Related Persons means the spouse, children, parents, siblings, close relatives, and acquaintances of directors, executives, and employees at all levels of the companies in the group.

The Company means TPBI Public Company Limited.

The Group means TPBI Public Company Limited and its subsidiaries.

Principle

Directors, executives, employees, as well as any persons acting for the benefit of the Group, have the duty to comply with the laws, rules, and regulations on anti-corruption, as well as the good corporate governance manual and the Code of Conduct, the policies, regulations, practice guidelines, and guidelines prescribed by the Company; to perform their duties with transparency; not to undertake any act demonstrating an intention constituting corruption; and are prohibited from demanding, undertaking, or accepting corruption for the benefit of themselves or related persons, including friends and acquaintances;



and are ready to accept examination of the performance of their duties from persons having the duty to examine or from relevant agencies at all times. Subsidiaries may consider applying the Company's policy and operating measures as appropriate.

Company Practices/Operating Measures

1. The Company appoints an Anti-Corruption Promotion Working Group to carry out the duty of ensuring that the Company's anti-corruption measures are efficient, in accordance with the Company's declared intention to become a member of the Thai Private Sector Collective Action Against Corruption (CAC).
2. The Company has a process for reviewing, examining, and improving anti-corruption measures, and reports to the Corporate Governance Committee annually, in order to measure effectiveness and to improve and develop the measures so as to be consistent with changing corruption risks.
3. The Company arranges for the assessment of corruption risks and has risk prevention measures, both in terms of Operational Control, Environment Control, and Financial Control and the retention of documents.
4. The Company has a process for examining the internal control system concerning the procedures for recording, financial reporting, the accounting process, and the retention of information, as well as having procedures for reporting issues identified from internal audits to senior executives and the Board of Directors.
5. The Company is politically neutral and has no policy of providing financial support, resources, or any other property, whether directly or indirectly, to any politician, political party, or political pressure group for the benefit of such politician, political party, or political pressure group.
6. The Company has no policy of paying facilitation payments in any form, whether directly or indirectly, and will not undertake, and will not accept, any act facilitating the conduct of business in exchange for such facilitation.
7. The Company has a policy of not employing government employees, in order to prevent such process from constituting a reward for obtaining any benefits.
8. The Company has personnel management policies and processes concerning the recruitment or selection of personnel, performance evaluation, the provision of remuneration, and promotion that reflect the commitment to anti-corruption.
9. The Company will not demote, punish, or produce negative effects on personnel who refuse fraud and corruption, even where such action causes the Group to lose business opportunities, with a process for communicating this to employees clearly.
10. The Company arranges for training on measures and knowledge concerning anti-corruption for the Group's personnel on a continuous basis.



11. The Company communicates the anti-corruption policy and practice guidelines to subsidiaries, associated companies, other companies over which the Company has control, customers, business partners, business allies, and stakeholders, as well as the public, through various communication channels, in order that they may acknowledge and implement the anti-fraud and anti-corruption measures.
12. The Company has practice guidelines in accordance with the anti-corruption policy on the receiving and giving of gifts, entertainment, or any other benefits (No Gift Policy) of the Group, for the Company's personnel to use as a guideline and to conduct themselves correctly.
13. The undertaking of matters under this policy shall be in accordance with the practice guidelines prescribed by the Company in the good corporate governance manual and the Code of Conduct, as well as the regulations, policies, requirements, and guidelines prescribed by the Company.
14. The Company reviews this policy regularly every 1 year, consistent with the preparation for applying for certification of membership of the Thai Private Sector Collective Action Against Corruption (CAC), or at appropriate intervals, in order to be consistent with changes in the relevant laws, rules, and regulations, by proposing it to the Board of Directors for consideration and approval.

Penalties

1. The Company prescribes penalties for directors, executives, and employees who do not comply with the anti-corruption measures, with penalty measures of removal from position for directors, and punishment in accordance with the requirements on disciplinary action for executives and employees, which penalties include termination of employment in cases where the Company deems it necessary. In addition, action will be taken in accordance with the laws, rules, or regulations, as well as the good corporate governance relating to such offense.
2. In the event that persons connected with the Group, or customers, business partners, or business allies, do not comply with the anti-corruption measures, the Group may consider canceling any transactions with such connected persons, or customers, business partners, or business allies.

Practices for the Company's Personnel

1. Personnel at all levels must strictly comply with the Company's anti-corruption policy and the process for preventing fraud and corruption, and must not become involved in corruption in any form, whether directly or indirectly.
2. Personnel at all levels are prohibited from giving or receiving bribes, including any other similar remuneration or benefits, to or from government officials and the private sector, whether directly or indirectly, in order to induce, influence, or obtain benefits that should not lawfully be obtained.



3. In undertaking any action that may pose a risk of corruption, personnel at all levels must act with care, particularly in the following matters:
 - 3.1 The giving or receiving of gifts, presents, entertainment, hospitality, and other related expenses shall be in accordance with the good practices prescribed by the Company in the good corporate governance manual and the Code of Conduct, and the practice guidelines under the anti-corruption policy on the receiving and giving of gifts, entertainment, or other benefits (No Gift Policy). The giving of charitable donations and the giving of support must be done in the name of the Company and with the objective of benefiting society or promoting the business and the good image of the Company and the Group, and must be undertaken with transparency, not constituting a channel for corruption, and in accordance with the procedures specified in the manual on donations and support for the public relations of the Company and the companies in the group.
 - 3.2 Personnel at all levels of the Group must avoid acts involving a conflict of interest with the Group. Any undertaking must be reasonable, based on acting for the benefit of the Group, and not contrary to the relevant laws, rules, and regulations. If there is any act falling within the scope of a conflict of interest with the Group, such person has the duty to report the conflict of interest in accordance with the practice guidelines and channels prescribed by the Company.
 - 3.3 Business relationships and procurement with the public or private sector, including dealings with the public sector or government officials or the private sector, as well as persons having relevant duties in the conduct of business of the Company and the companies in the group, whether domestically or internationally, must be carried out with transparency and honesty, and must be undertaken in accordance with the relevant laws.
 - 3.4 The Company's political neutrality policy supports all personnel in having political rights and liberties under the law, but they should be aware not to undertake, or to undertake any activities, including bringing any resources of the Company and the Group to use for undertaking or engaging in political activities that would cause the Group to lose its neutrality or suffer damage from becoming involved in and providing political assistance.
4. In engaging any person to act on behalf of, or in the name of, the Company, the personnel concerned must inform such person of the Code of Conduct on anti-corruption, and must ensure that the terms of such engagement are transparent, appropriate, lawful, and do not constitute fraud and corruption.
5. The Company prepares a complaint receipt policy in order to prescribe the procedures for receiving complaints and the procedures for consideration. The Company's personnel must not neglect or ignore, upon identifying an act falling within the scope of corruption relating to the



Group, which is regarded as a duty to notify supervisors or the responsible person, or to report information through the Whistleblower Channel, and to cooperate in examining the various facts.

The Company will provide fairness to and protect employees, or any other persons, who report information or evidence concerning corruption relating to the Company and the companies in the group, including employees who refuse to commit such acts, by applying protective measures for complainants or persons who cooperate in reporting corruption as prescribed in the complaint receipt (Whistleblower) provisions

In the event of doubt, contact or inquiries may be made at the Company Secretary Department, TPBI Public Company Limited, E-mail: company_secretary@tpbigroup.com

Whistleblowing and Receipt of Complaints

The Company encourages employees and stakeholders to jointly monitor and report inappropriate conduct, fraud, or violations of laws, regulations, and the code of business conduct. The Company will keep the information confidential and protect whistleblowers fairly.

Channel 1	Complaint in person at the head office TPBI Public Company Limited 42/174 Moo 5, Soi Srisathiannivet, Rai Khing Subdistrict, Sam Phran District, Nakhon Pathom Province 73210
Channel 2	Complaint made in writing Company Secretary Department, TPBI Public Company Limited 42/174 Moo 5, Soi Srisathiannivet, Rai Khing Subdistrict, Sam Phran District, Nakhon Pathom Province 73210
Channel 3	Complaint by telephone or facsimile Telephone 0-2429-0354-7 ext. 501 or Facsimile 0-2429-0358
Channel 4	Complaint through the Company's website (www.tpbigroup.com)
Channel 5	Complaint by email Audit Committee: ac@tpbigroup.com / hotline@tpbigroup.com Investor Relations: ir@tpbigroup.com Company Secretary: company_secretary@tpbigroup.com
Channel 6	Suggestion boxes for employees

The Company shall investigate every complaint supported by evidence fairly, transparently, and promptly, by:

- Maintaining the confidentiality of whistleblowers and witnesses
- Protecting whistleblowers from harassment
- Providing fairness to all parties

(Further details appear in: see SD-SEC-CN-014 Whistleblowing Policy)