

## Anti-Corruption Policy

Amata Corporation Public Company Limited realizes that corruption not only affects the company's business operations, reputation, and image but also poses a great obstacle to the organization's sustainable growth and national development. Amata Corporation Public Company Limited, its associated companies, subsidiaries, and affiliates (the "Company") is thus committed to strictly complying with related laws, rules, and regulations, as well as conducting business with honesty, transparency, morality, ethics, and responsibility to stakeholders that are in line with the principles of good corporate governance and the Company's business code of conduct, which sets the scope and standards of conduct for all employees of the Company, including what the Board of Directors, executives, and employees should do in conducting business and performing their duties. In addition, the Company encourages stakeholders throughout the supply chain to operate their businesses in the same way to create a good business environment that is an important foundation for sustainable business operations.

With the aim of achieving these results in a concrete way, the Company has therefore expressed its intention to be a member of the Collective Action Coalition Against Corruption in the Private Sector and cooperate with all sectors, both domestically and abroad, to create standards for transparent and fair business operations, as well as opposing all forms of corruption (zero-tolerance) by establishing an "Anti-Corruption Policy" as a guideline for all employees to adhere to and perform in the same way within the framework of morality and honesty, and relevant stakeholders are informed of the Company's intentions and business practices.

### Definitions

**Corruption** refers to actions in various forms that rely on positions, duties, and power illegally or immorally, and covers both direct and indirect bribery, whether in any form, such as accepting, demanding, or soliciting, including giving, offering, or promising to give property or any other benefits to government officers or private agencies, hoping to induce them to do or refrain from doing certain things that are wrongful by duty in order to unfairly gain the benefits of the business, themselves, or those involved and cause damages to the benefits of others, except in cases that local laws, rules, regulations, customs, and traditions, or trade customs allow so.

**Bribery** refers to offering, promising, accepting, or incentivizing to commit an illegal act, unethical business deal, breach of trust, or creating an unfair advantage. Incentives can take the form of gifts, loans, fees, rewards, or any other benefits such as taxes, services, donations, assistance, etc.

**Charitable donation** refers to giving money, goods, or anything of value to a charitable agency or organization for the public benefit without expecting anything in return.

**Support** refers to money, things, or any other benefits provided or received from customers, suppliers, or business partners with the objective of the business, brand, image, or reputation of the Company.

**Political support** refers to the providing of monetary and non-monetary assistance and support to politicians, political parties, or any person involved in politics, such as money, staff, venues, equipment, other facilities, and so on.

**Gift** refers to money, properties, things, services, privileges, or any other benefit in monetary and non-monetary forms that a person gives and/or receives on various occasions, other than salary, income, and benefits from normal employment.

**Conflict of interest** refers to a situation or action in which directors, executives, or employees have a desire for benefits for themselves and those involved, whether by blood or otherwise, which affects fair decision-making, performing duties and responsibilities, and taking into account the common interests of the Company.

**Facilitation fees** refer to expenses informally paid to government officers to facilitate or expedite processing, including making the payer receive special privileges from services that are superior to others.

## **Practices**

Directors, executives, and employees of the Company are prohibited from demanding, taking action, or accepting corruption in every country and every agency, both public and private sectors, in which the Company's business is involved. As part of company culture, all individuals must promote values of honesty, integrity, and accountability.

The anti-corruption policy governs the Company's operations in the following areas:

- 1) The Company conducts its business with integrity and transparency and does not give or accept bribes from any person inside or outside the Company. Cooperation with government officers must comply with the relevant laws, policies, and guidelines.
- 2) The Company complies with laws, rules, regulations, standards, policies, and guidelines, as well as the business code of conduct, without any direct or indirect acts of fraud and corruption (zero-tolerance).
- 3) The Company provides regular assessment and management of corruption risks, including creating guidelines for mitigating impacts that are consistent with risks and in accordance with the internal control system.
- 4) The Company prepares a work plan, preventive measures, procedures, and anti-corruption measures in business operations that are comprehensive and sufficient for implementation.
- 5) The Company provides orientation and training to employees and relevant stakeholders to build knowledge and understanding of the policy, measures, and procedures for anti-corruption.
- 6) The Company provides ethical operating processes and supervision of compliance with rules (ethic & compliance program), an internal control system, and the internal audit process to be in accordance with the relevant requirements, rules, regulations, and standards appropriately, adequately, and consistently, covering the processes of storing financial, accounting, marketing, sales, procuring, and personnel management records, and other processes related to the Company's operations.
- 7) The Company provides regular and timely reporting, monitoring, and review of the effectiveness of the compliance of the anti-corruption policy, including urgent issues found, with appropriate procedures and actions.
- 8) The Company provides appropriate and safe channels and processes for receiving complaints or whistleblowing for the Company's employees and stakeholders to request advice or suggestions or file complaints about corruption, including measures to protect whistleblowers, complainants, witnesses, and reporters.

- 9) The Company provides communication and promotes anti-corruption awareness to employees, customers, suppliers, and partners, including subsidiaries, associated companies, and other companies under the Company's control, and business representatives, as well as external stakeholders throughout the supply chain.
- 10) The Company provides support, exchanges knowledge and experience, and cooperates with private and public organizations, as well as civil society, both domestically and internationally, in anti-corruption.
- 11) All employees perform their duties without using or allowing others to use their position authority to demand, bargain, promise, or take any action that contributes to corruption, either directly or indirectly.

### **Duties and Responsibilities**

To ensure that the anti-corruption policy will be thoroughly implemented throughout the organization and there is clear supervision, the Company therefore determines the duties and responsibilities of individuals or departments within the organization as follows:

#### **Board of Directors**

- 1) Arrange for the formulation of current anti-corruption policies and measures suitable to the environment and risk factors by reviewing them at least once a year.
- 2) Establish a scope of anti-corruption measures that are sufficient to support and supervise the Company's operation related to such measures.
- 3) Supervise business operations to be in line with relevant laws, rules, regulations, policies, and guidelines, as well as encourage concrete implementation of this policy.
- 4) Encourage the management to assess the risk of corruption and allocate resources to ensure the effectiveness of appropriate and adequate risk control.
- 5) Consider reports on the implementation of anti-corruption policies and measures and provide useful recommendations to the management for development and improvement.

- 6) Consider urgent corruption issues to supervise operations to keep up with the situation.
- 7) Avoid any activity that may lead to that situation or suggestions that would cause a violation of that policy.
- 8) Encourage and support the management in being aware of and prioritizing anti-fraud and corruption and instilling them into corporate culture.

#### Audit Committee

- 1) Supervise and review the internal control system, internal audit, and assessment of corruption risks to be effective and efficient.
- 2) Consider reports on the implementation of anti-corruption policies and measures.
- 3) Consider urgent corruption issues to supervise operations to keep up with the situation.
- 4) Provide appropriate, safe channels and processes for whistleblowing or receiving complaints, including measures to protect whistleblowers, complainants, witnesses, and information reporters.

#### Good Corporate Governance Committee

- 1) Develop and improve anti-corruption policies and measures.
- 2) Encourage relevant parties to carry out and comply with the scope of measures regarding anti-corruption set by the Board of Directors.
- 3) Arrange for all parties to receive knowledge and advice on anti-corruption policies and measures correctly, completely, and clearly.

#### The Management

- 1) Establish anti-corruption procedures and measures in accordance with the policy, regulations, and laws of the countries in which the Company conducts business.

- 2) Provide an internal control system, internal audit, and effective anti-corruption risk management.
- 3) Establish an organizational structure with clear responsible persons and roles along with allocating appropriate and sufficient resources to be effective in controlling corruption risks.
- 4) Present urgent issues related to corruption (if any) to the Audit Committee and the Board of Directors.
- 5) Encourage subordinates at all levels to be aware of the importance of complying with anti-corruption policies and measures and cultivate a culture of anti-corruption in all forms.
- 6) Follow up, supervise, manage, and support compliance with relevant policies, measures, and regulations.
- 7) Report the results of the audit of compliance with anti-corruption policies and measures to the Audit Committee and the Board of Directors on a regular basis.
- 8) Protect subordinates and related stakeholders who refuse to engage in corruption even if such actions cause the Company to lose business opportunities.
- 9) Act as a good role model by avoiding any activity that may lead to situations or suggestions that could result in policy violations.

Department of Human Resource Management and General Administration

- 1) Establish a human resource management process that reflects the Company's commitment to compliance with anti-corruption policies and measures.
- 2) Communicate anti-corruption policies and measures to relevant stakeholders thoroughly.
- 3) Follow up and collect acknowledgment forms and comply with anti-corruption measures that the Company's employees have signed.

#### Internal Auditor / Compliance Unit

- 1) Assess and manage the risk of fraud and corruption, as well as providing guidelines to prevent and mitigate the impact of high-risk cases.
- 2) Set work plans and procedures, as well as anti-corruption measures that cover the process of reporting urgent issues to executives and the Board of Directors.
- 3) Create a process for inspecting anti-corruption operations (Due Diligence Process) in business projects and activities of both the Company and stakeholders throughout the supply chain (Supply Chain Due Diligence) /suppliers who will join in doing business.
- 4) Establish an ethics and compliance program and internal controls that are appropriate and adequate to potential risks of fraud and corruption.
- 5) Review the internal control system and internal audit of corruption, as well as notifying and following up with relevant departments for regular improvements.
- 6) Collect and prepare reports on inspection results and compliance with anti-corruption policies and measures for reporting to the Audit Committee.
- 7) Provide advice on anti-corruption policies and measures, as well as coordinating or discussing with other departments that may be involved in providing accurate, complete, and clear advice.

#### Company Secretary Department

- 1) Coordinate and exchange knowledge with other departments to bring information to develop anti-corruption work.
- 2) Coordinate and communicate the scope of measures set by the Board of Directors for relevant departments to implement.
- 3) Provide information and advice on anti-corruption policies and measures to the Board of Directors and appointed external experts.

- 4) Set up an agenda to regularly consider the operating results according to anti-corruption policies and measures at the Board of Directors' meetings.

#### Chief Executive Officer

- 1) Promote and support anti-corruption policies.
- 2) Operate in good faith.
- 3) Avoid actions that may cause violations of the corruption policy, business code of conduct, and the law.
- 4) Be a good role model by following policies, measures, corporate governance principles, and the business code of conduct.
- 5) Create awareness and promote the culture of anti-corruption by continuously communicating to employees at all levels and relevant stakeholders.

#### Company Employees

- 1) Learn and understand the roles, duties, and responsibilities of corruption risk management related to their departments.
- 2) Inspect, prevent, and report bribery and corruption behavior.
- 3) Comply with anti-corruption policies and measures, including the principles of good corporate governance, business ethics, and other relevant practices by avoiding any activity that may lead to the situation or suggestions that would lead to a violation of that policy.
- 4) When someone is found to have committed an offense or committed an act that violates this policy, the information or complaint must be reported through the Company's whistleblowing channels.



## **Practical Measures**

Anti-corruption measures are established as an important practice to prevent potential corruption risks. The Company must always review, inspect, and evaluate the effectiveness of its measures. The Company's directors, executives, and employees must perform their duties with prudence and caution in the following issues:

### **1) Receiving and giving gifts, welcome service, or other benefits**

Receiving and giving gifts, gratuities, and hospitality, or any other benefits, can be accomplished by ensuring that the value of gifts, gratuities, and hospitality does not exceed the legal limit set by that country and informing stakeholders of the practical measures, including a mechanism for regular control and inspection. Receiving and giving gifts must have the following characteristics:

- 1.1) Execute it correctly, transparently, not contrary to moral principles, and comply with the laws and procedures of the Company, including government agencies, state enterprises, and other relevant agencies.
- 1.2) Be suitable for the situation, festivals, and traditions of each locality.
- 1.3) Do not use it as an excuse or channel for corruption.
- 1.4) Do not create a conflict between personal interests and the Company's interests.
- 1.5) Do not accept or give gifts, gratuities, hospitality, or other benefits if they will have an impact on the Company's operations.
- 1.6) Prepare a record or register to control the receipt or giving of gifts, clearly specifying the purpose and name of the person or agency receiving or giving gifts, the value of the gifts, and the approver.

### **2) Charitable Donations and Sponsorship**

Financial support, charitable donations, or all types of financial support are considered part of activities for society, strengthen a good image, and are in line with the Company's objectives.

Such support must be provided in a transparent manner, with procedures and strict disbursement controls. Donations and support must have the following characteristics:

- 2.1) Operate correctly, openly, and transparently and not contrary to moral principles and comply with the laws and regulations of the Company, including related government agencies, state enterprises, and other agencies.
- 2.2) Align with social, community, and environmental policies or activities to promote the Company's sustainable development or activities that bring benefits to society.
- 2.3) Do not use it as an excuse or channel for corruption.
- 2.4) There is no hidden purpose to gain an advantage or create incentives to benefit the business.
- 2.5) Do not create a conflict between personal interests and the Company's interests.
- 2.6) Prepare a memorandum of approval by clearly stating the purpose and name of the person, the organization receiving the donation or support, along with attaching relevant documents to propose to the Company's authorized person for approval before proceeding.
- 2.7) Follow up and verify that donations or support are used in accordance with the objectives.

### 3) Political Contributions and Activity

The Company provides transparent and verifiable political support without discrimination or misappropriation to political parties or individuals. Any action related to political activities must meet the following characteristics:

- 3.1) Conduct business with political neutrality and do not have a policy of providing political assistance or committing acts that are affiliated with any political party or political group.
- 3.2) Promote employees' personal rights and freedoms according to constitutional and other related laws.

- 3.3) Employees are prohibited from utilizing the Company's assets or delivering services on behalf of the Company to support political activities, or from engaging in any act that creates an understanding that the Company is involved with or supports any political party or group.
- 3.4) Establish a process for reviewing and inspecting political support.
- 3.5) Prepare a memorandum of approval by clearly stating the purpose and name of the person, the organization receiving the support, along with attaching relevant documents to propose to the Company's authorized person for approval before proceeding.

#### 4) Facilitating Payment

The Company does not have a policy to pay for facilities and does not accept any actions in exchange for convenience or unfair business advantages. The guidelines are as follows:

- 4.1) Do not pay for convenience, either directly or indirectly, or pay according to customs or through others, particularly paying money to facilitate government officers.
- 4.2) Avoid or close opportunities that will cause individuals to be in a situation of paying convenience fees.
- 4.3) Create procedures for the approval and verification of facilitating payments.
- 4.4) Notify the supervisor to find a solution together when the facilitation fee is asked.

#### 5) Revolving Door

The Company must provide guidelines for employment verification to prevent the appointment or hiring of officers from the Thai government or countries in which the Company invests that may lead to conflicts of interest and create fraud and corruption risks by doing the following:

- 5.1) Do not appoint or hire officers who are still in the office of the Thai government or countries in which the Company invests, except for state enterprises that have

regulations from the agency to allow representatives from state enterprises to work in the organization or have reasonable grounds.

- 5.2) Appoint or hire a former government officer of Thailand or the country in which the Company invests who has retired from office for not less than two years, unless there are reasonable grounds.
- 5.3) Arrange a due diligence process for the person to be nominated by the Company to serve as a director, advisor, and executive, as well as formulating guidelines to prevent conflicts of interest.
- 5.4) Set proper employment requirements, including measures to disclose names and history of former government officers who are appointed or hired as company employees.

#### 6) Data Recording and Storage Process

The process of recording and retaining the Company's accounting and financial information must be accurate, complete, transparent, and verifiable. It must have an efficient and reliable internal control and internal audit system under the supervision of the Audit Committee. Guidelines for recording and retaining data must be in accordance with the code of conduct and corporate governance policy, announcements, regulations, and relevant policies.

#### 7) Human Resource Management

Establish a human resource management process that reflects the commitment to the implementation of comprehensive anti-corruption policies and measures, covering recruitment, selection, training, performance appraisal, transfers, promotions, various forms of remuneration and benefits, termination of employment, and retirement.

#### 8) Communication and Training

##### 8.1) Communication

- 8.1.1 Arrange for the communication of anti-corruption policies and measures to relevant stakeholders for acknowledgment, including directors, executives, employees, subsidiaries, associated companies, and other companies under the Company's

control, as well as business representatives and suppliers, and evaluate its efficiency and continuous improvement.

8.1.2 Arrange for communication of punishment for non-compliance with anti-corruption policies and measures, as well as communication of policies regarding non-demotions, punishment, or a negative impact on the directors, executives, and employees who deny corruption, even if such actions result in the Company losing business opportunities to the directors, executives, and employees.

8.1.3 Arrange for disclosure of information to the public regarding the Company's anti-corruption policies and measures.

When policies and related measures are developed or revised, they must be communicated and revealed on a regular basis using appropriate communication channels such as letters, emails, websites, printed media, and public relations signage.

## 8.2) Training

8.2.1 Provide regular orientation and training on anti-corruption policies and measures to the directors, executives, and employees at all levels.

8.2.2 Encourage directors and executives to participate in raising awareness among employees of anti-corruption policies and measures, and to serve as good role models.

## 8.3) Requesting Advice

If the directors, executives, employees, or stakeholders have any questions about anti-corruption policies and measures, they can inquire or seek advice at:

- Legal Department and Company Secretary

Telephone: (02) 792-0000

Tel: (02) 792-0000

Email: [cs@amata.com](mailto:cs@amata.com)

Post: Legal Department and Company Secretary  
Amata Corporation Public Company Limited  
2126, Kromdit Building, 2nd Floor,  
Petchburi New Road, Huai Khwang District,  
Bangkok 10310

### **Penalty**

The anti-corruption policy is considered part of the operational discipline. Directors, executives, and employees who do not comply will be investigated and disciplined in accordance with the Company's regulations, charters, and relevant laws. This may include termination of employment. In the event of an investigation, all employees must fully cooperate with internal and external agencies.

At the same time, the Company will not demote, punish, or have a negative impact on directors, executives, and employees who reject corruption even if such action causes the Company to lose business opportunities.

Therefore, this notification is announced for acknowledgment and thorough observance.

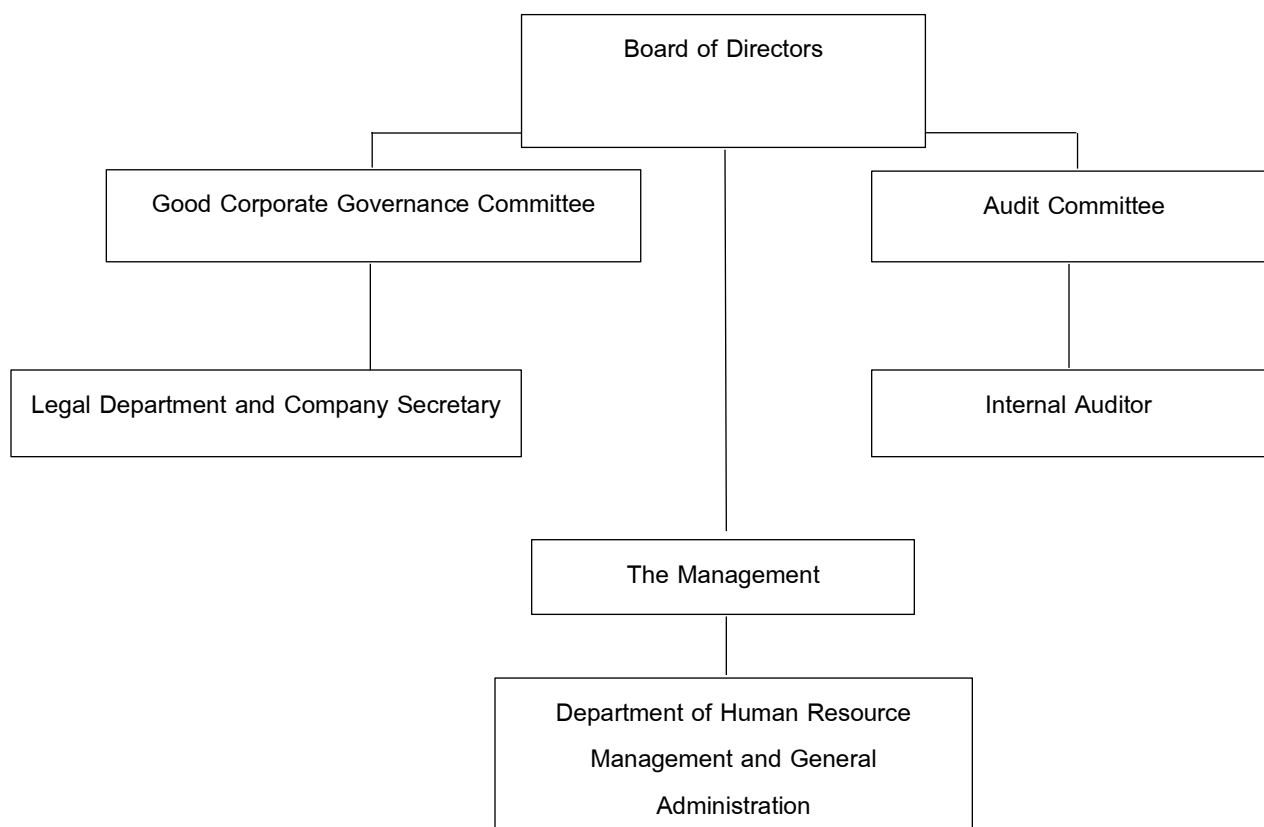
Announced on September 2, 2023.

*-Signature-*

(Mr. Vikrom Kromadit)

Chairman of the Board of Directors

## Structure of Persons Responsible for Anti-Corruption



### Scope of Application

The scope of application of this policy shall be effective for all directors, executives, and employees of the Company.

### Implementation of Measures by Relevant Individuals and Companies

Amata Corporation Public Company Limited encourages its subsidiaries, associated companies, and affiliated companies, joint ventures, co-investment partners, and suppliers to adopt anti-corruption policies as guidelines.