

Anti-Corruption Policy

Mc Group Public Company Limited

Effective on November 9, 2023

Announcement

The Directors, Executives, and Employees of Mc Group Public Company Limited (the "Company") and its subsidiaries are responsible for studying, understanding, and adhering to this Anti-Corruption Policy to ensure that the operations of the Company and its subsidiaries are conducted with integrity, transparency, quality, and social responsibility.

Furthermore, the Company encourages its partners and business allies to understand and adopt the Company's Anti-Corruption Policy in a manner suitable for their business context and organizational structure.

This Anti-Corruption Policy is a supporting policy under the Company's Business Ethics. The Company's management has established guidelines on providing or accepting sponsorships, gifts, gratuities, hospitality, and donations for charitable or public causes to ensure clarity in adhering to this policy. The Board of Directors will review this Anti-Corruption Policy annually to ensure its appropriateness and alignment with the business environment. The Board will also oversee the implementation of this policy, ensuring that Directors and Executives lead by example and promote complete, accurate, and careful compliance with all related policies and practices.

-Signed by-

(Mrs. Kaisri Nuengsigkapan)
Chairman of the Board of Directors
Mc Group Public Company Limited

Definitions

The Company	Refers to	Mc Group Public Company Limited and its subsidiaries.
Subsidiary	Refers to	A company in which Mc Group Public Company Limited holds more than 50% of the shares.
Associate	Refers to	A company in which Mc Group Public Company Limited or its subsidiaries hold more than 20% but no more than 50% of the shares.
Group of Companies	Refers to	Mc Group Public Company Limited, its subsidiaries, associates, and any other companies under its control.
Board of Directors	Refers to	The Company's Board of Directors and sub-committees.
Sub-Committees	Refers to	The Audit Committee, the Nomination and Remuneration Committee, the Risk Management and Sustainable Development Committee, the Executive Committee, and other sub-committees that may be appointed in the future.
Executives	Refers to	Chief Executive Officer and the first four executives as defined by the Securities and Exchange Commission's regulations.
Employees	Refers to	all employees under the executive level of Mc Group Public Company Limited and its subsidiaries.
Company Personnel	Refers to	Board of Directors, Executives, and all Employees of the Company.
Related Persons	Refers to	Individuals related by blood, legal registration, or de facto relationships, including spouses, cohabitants, children, children's spouses, minors, adopted children (whether minors or adults), parents, and siblings of the Company's personnel, as well as any legal entities in which such individuals have control, either directly or indirectly, or are major shareholders.
Fraud	Refers to	Acts by Company personnel, business partners, or those related to the Company's operations to unjustly gain personal or others' benefits through their positions or by law, either directly or indirectly. Examples include falsification or alteration of documents, misreporting information, concealing records, creating false evidence, forgery of signatures, embezzlement, fraud, or misappropriation.

Corruption	Refers to	Misuse of authority or assets for personal, organizational, or others' gain, causing harm to the interests of others. It includes bribery in any form, such as offering, promising, demanding, giving, receiving, or securing items, money, or other benefits. It also covers concealment of facts, obstruction of justice, misuse of authority to threaten or extort benefits, and conflicts of interest. This applies to both private-to-public and private-to-private relationships, except where permitted by law, regulations, local customs, or trade practices.
Bribery	Refers to	Offering, giving, promising, or receiving money, assets, or other benefits to influence a person's actions or omissions in performing their duties, with the intention of gaining or retaining improper business advantages that are illegal, unethical, or damaging to the Company's image.
Customary Practices	Refers to	Social customs passed down through generations, including important occasions or festivals where gifts are exchanged as part of traditional etiquette and social norms.
Gifts	Refers to	Cash or items of monetary or sentimental value given or received on important occasions in line with cultural or social customs or local traditions, such as New Year's gifts, birthday gifts, gifts for speakers or seminar participants, etc.
Giving and Receiving Gifts	Refers to	Act of giving or receiving gifts by Company personnel from or to any person, which is outside of the normal salary, income, or employment benefits.
Hospitality and Reception	Refers to	Provision of entertainment or meals in accordance with cultural or customary practices, covering recreational activities, and may include covering travel expenses, accommodation, meals, or similar items. This does not include seminars, knowledge-enhancing activities, or public relations events.
Donations	Refers to	monetary or non-monetary contributions made directly or indirectly to any individual, legal entity, or organization for charitable purposes.

Sponsorship	Refers to	Monetary or non-monetary assistance provided, either directly or indirectly, to individuals or organizations, both governmental and private, for the purpose of supporting the Company's business, public relations, and enhancing the Company's image, thereby building business credibility and relationships.
Receiving Sponsorship	Refers to	Receiving monetary or non-monetary assistance, either directly or indirectly, from any individual or entity for the benefit of the sponsor.
Political Contributions	Refers to	Provision of financial or non-financial assistance to political parties, politicians, or political candidates, including loans, donations of money or assets, and various services, either directly or indirectly.
Conflict of Interest	Refers to	A situation where the personal interests of Company personnel conflict with the collective interests, either directly or indirectly, which may compromise the individual's objectivity, independence, transparency, or fairness in fulfilling their duties or responsibilities, potentially violating any rules, regulations, or laws.
Facilitation Payments	Refers to	Payments made to public officials to expedite routine tasks or necessary functions that the official is already required to perform.
Government Employees or Officials	Refers to	"State officials" as defined by anti-corruption laws, including civil servants, public officials, state enterprise employees, laborers, agents, or any other individuals acting on behalf of: 1) Ministries, departments, or government agencies, 2) International organizations, 3) Political parties, politicians, or local government administrators, 4) Regulatory agencies, or 5) State enterprises, companies, or organizations owned or controlled by the state. This also applies to former government officials who have left service within the past two years.

1. Objectives

Mc Group Public Company Limited (the "Company") and its group of companies recognize the importance of good corporate governance, operating with integrity, transparency, and an emphasis on combating all forms of corruption. The Company ensures that its directors, executives, and employees at all levels avoid any actions that could involve corruption in any form, whether for direct or indirect benefit to themselves, their family, friends, or any related individuals. The Company operates in compliance with the law, benefiting society, and encourages employees to act with integrity and as responsible citizens. Therefore, the Company has established an anti-corruption policy to serve as a clear guideline for preventing and combating corruption within the Company. The policy aims to cultivate a corporate culture where everyone is aware of the harm caused by corruption, instill proper values, and build trust among all stakeholders, ensuring effective anti-corruption measures.

2. Scope of Application

- 2.1 Directors, executives, and employees of the Company at all levels are prohibited from participating in any form of corruption, both directly and indirectly. This includes bribery and the seeking of improper benefits, such as soliciting, accepting, offering, or providing property or other benefits to government officials or individuals conducting business with the Company for personal gain, the benefit of others, or to create business opportunities for the Company.
- 2.2 The Company is committed to complying with laws and standards related to anti-corruption and anti-bribery in Thailand, as well as in any country where the Company's representatives conduct business on behalf of the Company.
- 2.3 This policy extends to the Company's business partners, business alliances, or any individuals acting on behalf of the Company.
- 2.4 Any violation of this policy by directors, executives, or employees, whether directly or indirectly, will be subject to disciplinary actions in accordance with the Company's regulations and may result in legal penalties. All personnel are expected to understand and comply with the anti-corruption policy at every stage of their work. If any violations

are observed, they should be reported immediately to supervisors or the responsible department/personnel.

- 2.5 Supervisors who ignore violations or non-compliance with this policy by their subordinates, or who are aware of such actions but fail to take corrective measures or report the misconduct, will also be subject to disciplinary actions according to the Company's regulations.
- 2.6 The Company's business partners and alliances are required to study this policy. If any violations are found, the contract may be terminated without prior notice.
- 2.7 The Company will ensure fairness and protect any directors, executives, or employees who refuse to engage in or report corrupt activities within the Company. The Company will not punish, demote, or negatively impact any directors, executives, or employees who refuse to engage in activities leading to corruption, even if such refusal results in the loss of business opportunities for the Company.
- 2.8 Corruption and bribery may occur in various forms, such as:
 1. Giving/receiving gifts or hospitality (Gift & Hospitality)
 2. Political contributions (Political Contribution)
 3. Charitable donations (Charitable Donation)
 4. Giving/receiving sponsorships (Sponsorships)
 5. Facilitation payments (Facilitation Payments)
 6. Hiring government employees or officials (Revolving Door)

3. Responsibilities

- 3.1 The Company's Board of Directors is responsible for setting the anti-corruption and anti-bribery policy and overseeing management to ensure the effective and efficient implementation of these measures in line with the policy. The Board also ensures that management fosters a transparent and trustworthy corporate culture to promote the Company's positive image.
- 3.2 The Audit Committee is responsible for reviewing the financial reporting and accounting system, internal control, internal audit, and risk management systems to ensure they are stringent, up-to-date, and effective, in accordance with relevant standards. The Audit Committee must report its findings to the Board of Directors every quarter.

- 3.3 The Risk Management and Sustainable Development Committee is responsible for reviewing and assessing potential risks of corruption and bribery, providing recommendations to management on handling high-risk events, and suggesting appropriate preventive measures. The committee also regularly reviews the current risk management measures and reports corruption-related risks to the Board of Directors.
- 3.4 The management team is responsible for establishing a system that promotes and supports the anti-corruption policy and ensures its communication to all Company personnel. Management must ensure that this policy is implemented in practice and embed this value into the Company's culture. They are also responsible for mitigating corruption risks, managing high-risk incidents, reviewing and updating risk management systems annually, and reporting issues to the Board of Directors or the relevant sub-committees as required.
- 3.5 The Internal Audit Department is responsible for ensuring the internal control system is effective in combating corruption and bribery. This includes regular checks on systems and processes to ensure compliance with policies, practices, authority protocols, regulations, and laws. The department reports its findings to the Audit Committee.
- 3.6 The Risk Management Committee is responsible for assessing risks, including corruption and bribery risks, at least annually, identifying high-risk events, and recommending preventive and corrective measures. The committee must review and update the risk management system regularly and report its findings to the Risk Management and Sustainable Development Committee.
- 3.7 The Human Resources Department is responsible for managing the Company's human resources processes to reflect a commitment to anti-corruption, from employee selection, training, and performance evaluation to compensation, promotion, and disciplinary measures. The department must ensure transparency, fairness, and accountability in dealing with employee misconduct and disciplinary actions. Additionally, HR, together with the Internal Audit Department, is responsible for investigating reports of violations of the anti-corruption policy and determining disciplinary actions as needed.

- 3.8 The Anti-Corruption and Sustainable Development Committee is responsible for:
1. Developing and reviewing anti-corruption policies, plans, guidelines, and measures annually to ensure effective governance and transparency.
 2. Conducting self-assessments for anti-corruption measures to obtain the Thai Private Sector Collective Action Against Corruption (CAC) certification and performing regular reviews.
 3. Training and developing all executives and employees to ensure understanding of anti-corruption.
 4. Communicating and monitoring the implementation of anti-corruption measures across all departments.
- 3.9 The Accounting Department is responsible for accurate record-keeping and safeguarding financial data, ensuring compliance with Company policies, standards, and anti-corruption measures, and preventing the recording of false or manipulated information.
- 3.10 The Legal Department is responsible for providing legal advice, recommendations, and handling legal matters arising from anti-corruption policy violations.
- 3.11 The Company Secretary Office is responsible for advising on and monitoring the implementation of the anti-corruption policy, ensuring compliance within the Company and its subsidiaries. They also liaise with relevant departments to communicate updates on anti-corruption laws and practices and report progress to the Board or Audit Committee when requested.
- 3.12 All personnel of the Company are responsible for understanding and complying with the anti-corruption policy. In case of any doubts or if violations of Company regulations are discovered, they must report to their supervisors or through the Company's whistleblowing channels.

4. Measures and Guidelines

Corruption and bribery can occur in various forms. To ensure clarity in handling high-risk situations that could lead to corruption, the Company's directors, executives, and employees at all levels must exercise caution in

the following areas. Additionally, all approvals must comply with the Company's approval authority matrix.

4.1 Giving/Receiving Gifts, Hospitality, and Entertainment

4.1.1 The Company recognizes the importance of fostering good business relationships with its business partners. This policy does not prohibit any transparent actions that are part of normal business operations, which may be permissible by law, regulations, local customs, traditions, or business practices. These include providing entertainment, hospitality, and giving or receiving gifts on special occasions, as long as they are reasonable and in line with the Company's business ethics.

4.1.2 Guidelines for giving or receiving gifts and hospitality are available internally within the Company and can be referenced from the "Guidelines on Sponsorship, Gifts, Hospitality, and Charitable Donations."

4.1.3 Gifts or hospitality may be given or received on special occasions under the following conditions:

- (1) They are not intended to influence decisions or encourage improper conduct that could affect business decisions or provide inappropriate advantages.
- (2) They do not violate this policy, the Company's business ethics, or any relevant laws.
- (3) Gifts are given in the name of the Company, not personally.
- (4) They are appropriate for the occasion and customary, such as exchanging gifts at a New Year's party.
- (5) The exchange of gifts is done openly.
- (6) Hospitality and entertainment expenses are necessary, reasonable, not excessive, or overly frequent.

4.1.4 Directors, executives, and employees must exercise care to ensure that the giving or receiving of gifts and hospitality is not used as a channel for corruption. These activities must be reviewed by the internal audit department to ensure compliance with relevant laws and regulations.

4.2 Political Support

- 4.2.1 The Company maintains political neutrality and does not support or align with any political party, including refraining from supporting or assisting political parties, politicians, or election candidates, either directly or indirectly.
- 4.2.2 Directors, executives, and employees of the Company have the right to participate in political activities as provided by the Constitution and relevant laws, such as voting or participating in referendums. However, they must not use Company assets, resources, or work time to support political activities or make any statement implying that the Company supports any political party.
- 4.2.3 Employees must not use their authority to coerce, pressure, or compel colleagues or subordinates to support any political activities, either directly or indirectly.

4.3 Charitable Donations and Sponsorship

- 4.3.1 Donations must be made solely for charitable purposes. Donations must be made to a legitimate charitable organization, with clear documentation or proof of receipt, and must comply with the Company's regulations.
- 4.3.2 Sponsorship serves as a means of promoting the Company's business. Sponsorships must be reasonable, appropriate, and aligned with the Company's Code of Conduct and Good Corporate Governance Policy, without creating conflicts of interest between personal and Company interests.
- 4.3.3 Directors, executives, and employees must ensure that donations and sponsorships are not used as a disguise for bribery. Donations and sponsorships must not be intended to gain advantages or incentives in business dealings. They must be reviewed transparently and comply with relevant laws and regulations. A written request outlining the purpose of the donation or sponsorship, along with supporting documentation, must be submitted to the appropriate approving authority.
- 4.3.4 The Company does not have a policy to accept any external sponsorship for any purpose. If an external party offers support to the Company or its employees, the employee must decline and immediately report it to their direct supervisor.

4.4 Facilitation Payments

4.4.1 The Company has a policy not to make or receive facilitation payments. However, legally sanctioned expedited processes are acceptable, provided such services are available to all and comply with the legal framework of the relevant country.

4.4.2 Directors, executives, and employees must exercise caution when requested to make payments on behalf of the Company. They should ensure that such payments are for legitimate purposes, appropriate in amount, and necessary. Receipts detailing the transaction should be requested for any required payment. If there are any doubts or questions regarding the necessity of such payments, employees should report them to their supervisors.

4.5 Employment of Government Officials

4.5.1 The Company has a policy not to hire employees or government officials if such employment could result in a lack of transparency in business operations.

4.5.2 The hiring of employees or government officials must be conducted transparently, with full disclosure of the names and backgrounds of former government officials appointed as consultants, directors, or executives of the Company, along with the reasons for their appointment, in the Company's public documents or annual report.

5. Communication and Training

5.1 Directors, Executives, and Employees: The Company will communicate its anti-corruption policy to all levels of the organization through various channels, such as employee training, to ensure that all employees are aware of and understand the Company's anti-corruption policy. Employees can also access the latest updated information and policy through the Company's internal communication channels, including the website and intranet. The Company will notify employees of any significant changes. Anti-corruption training will be part of the onboarding program for new employees. For directors, the Company will present information on the anti-corruption policy and provide orientation to new directors on this policy.

5.2 Business Partners and Affiliates: The Company will communicate its anti-corruption policy to business partners and affiliates at the outset of the business relationship and subsequently as appropriate. The Company encourages its business partners to adhere to transparent business practices in line with the Company's standards.

6. Human Resource Management

The anti-corruption policy extends to all human resource management processes, including recruitment, promotion, training, performance evaluation, and compensation. Supervisors at all levels are responsible for communicating and ensuring that their employees follow these guidelines effectively, as follows:

6.1 Employment: The Company specifies the types and qualifications required for employment. Candidates meeting the Company's criteria must not have a history of misconduct or corruption in any form, including abusing their position for undue benefit.

6.2 Performance Evaluation: Annual performance evaluations, which determine compensation and promotions, must include an assessment of behavior, particularly regarding the misuse of authority for personal gain or corruption in any form. This behavior is one of the factors considered in the evaluation process.

7. Complaints

7.1 Complaints and Reporting Corruption: It is the duty of all Company personnel to report corruption and fraudulent activities through the methods and channels specified in the Company's whistleblowing policy.

7.2 Cooperation: Directors, executives, and employees are all required to cooperate in investigations of fraud and corruption.

7.3 Whistleblower Protection: Whistleblowers will be protected according to the Company's whistleblowing policy, and their identities will remain confidential.

8. Penalties

8.1 Directors, Executives, and Employees: Any director, executive, or employee who intentionally violates this policy, including engaging in harassment, intimidation, or unfair discrimination against whistleblowers or individuals involved in a complaint or investigation under this policy, shall be considered to have committed a disciplinary offense. Such individuals will be subject to disciplinary action as specified in the Company's work regulations and may also face civil and/or criminal liability as stipulated by applicable laws.

8.2 Business Partners and Affiliates: Business partners or affiliates who violate the guidelines related to this policy, are aware of actions that conflict with this policy but fail to report them to the Company's management, provide false information, or do not fully disclose relevant information when questioned by the Company's investigators may face termination of their contracts.

9. Review, Audit, and Improvement

The Board of Directors mandates that this policy be reviewed annually. In cases where urgent significant adjustments are required, the Corporate Secretary's Office must promptly present the necessary revisions to the Board for approval.

Announced on November 9, 2023