

Anti-Corruption Policy

Royal Plus Public Company Limited ("The Company") has the ideology to conduct business with integrity by adhering to the importance of social responsibility and all groups of stakeholders under the management framework in accordance with the principles of good corporate governance and operate business with transparency with an internal control and audit system that reduces the chance of fraud in the organization to show the intention and determination against corruption in all forms. In order for the Company to determine the appropriate roles, duties and responsibilities in preventing corruption that may occur in the Company's business and so that decisions and operations at risk of corruption have been carefully considered and treated, the Company therefore provide a written anti-corruption policy with clarification, understanding, and communication to the Board of Directors, the Executives and employees at all levels thoroughly to provide clear guidelines for business operations and development towards a sustainable organization.

1. Definitions

- (1.1) **The Company** refer to Royal Plus Public Company Limited.
- (1.2) **The Director** refer to Directors of Royal Plus Public Company Limited.
- (1.3) **The Executive** refer to Chairman of the Board of Directors, Managing Director, Deputy Managing Director, and Employees of Department Manager level or above of Royal Plus Public Company Limited.
- (1.4) **Employee** refer to Permanent employees, Fixed-term contract employees, and Intern.
- (1.5) **Stakeholder** refer to shareholders, investors, employees, customers, business partners, Contractors, manufacturers, competitors, creditors, society, communities, government agencies and related organizations.
- (1.6) **Government Employee** refer to government officials, political office holders, Constitutional Court Judges, Position holders in independent organizations, and the National Anti-Corruption Commission.
- (1.7) **Government Official** refer to civil servants or local government employees who hold the position, workers in government agencies or state enterprises, local administrators, deputy local administrator, assistant local administrator, local council members of local government organizations, Officials according to the local law or other officials as provided by law, director, sub-committees, government employee of government agency or state enterprise, and all personal or groups who are authorized by law to exercise authority or be assigned to exercise administrative authority established in the bureaucracy, state enterprise, or other state affairs.
- (1.8) **Government Employee / Government Official** include persons who were government employee / government officials or state enterprises / government agency consultants or state enterprise agencies
- (1.9) **Fraud** means wrongfully pursuit of money or property or any other benefits that could be calculated as the company's income, by duty or by law, from private agencies, customers, partners, contractors, creditors, employees, and/or all groups of stakeholders whether directly or indirectly, such as creating false financial evidence, malpractice, taking the Company's assets to use for personal or family benefit, providing false and distorted information to cause misunderstanding, Fraud, concealment of evidence, and acting in a way that benefits oneself and one's friends, etc.
- (1.10) **Corruption** means giving, asking or accepting to give or act in any form such as offering, promising, conferring, pledged to give property or any other benefit ("bribe"), etc., to government officials, government agencies, private entities or persons having duties, whether directly or indirectly, in order to or to induce such person to act or refrain from acting or performing duties that are unfavorable including requesting to



accept or agree to accept property or any other benefit for oneself or others wrongly to act or omit to act or perform any duties, whether lawfully or not, except in the case where laws, regulations, announcements, rules, local customs or trade customs are permitted.

- (1.11)**Bribe** means property or any other benefits that may be calculated as income, given to a to induce such person to act or refrain from acting or performing duties as the bribe payer desires.
- (1.12)**Custom** means traditions of society that have been passed down from generation to generation such as New Year Festival, Songkran Festival, Chinese New Year Festival, Hungry Ghost Festival, Christmas Festival
- (1.13)**Any other benefit** means anything of value, such as a discount, entertainment, service, training, or anything in the same manner.
- (1.14)**Giving/receiving Gifts** means money, property, thing or any other benefit given to one another for hospitality or to build good relationships in business which occur on special occasions according to tradition.
- (1.15)**Entertainment** means Meals, snacks, drinks, travel expenses, accommodation expenses or any service whether it is performing, watching sports, or participating in sports activities. Visiting worksite both domestically and abroad, various recreational activities including entertainment services for the purpose of building business networks and/or building business relationships.
- (1.16)**Hospitality** mean reassurance and assistance to visitors with friendliness and attentiveness to make visitors feel comfortable and satisfied.
- (1.17)**Giving/Receiving Donations for Charity** means giving or receiving money, items, or anything other benefit that can be calculated as money to public organizations such as foundations, temples, schools, hospitals or organizations for social benefits without expecting anything in return with the objective being the benefit of society.
- (1.18)**Giving/Receiving Sponsorship** mean giving or receiving money, items, or anything other benefit that can be calculated as money with business objective in giving or receiving sponsorship for activities or various projects for business such as public relations, advertising, building trade credibility, branding, and good image and reputation of the Company.
- (1.19)**Political contributions** means to help, whether financially or otherwise, to support a political party. For example, property, benefits, or places to support political activities (accommodations, receptions, meeting place). This include political campaigns to support the activities of political parties, political coalition groups, politicians, or people involved in politics whether at the local, regional, national, international or global level, including support of policy or inappropriate actions or actions that go against the law or morals, which have a negative effect on the community, society, and country or action which may cause division in society, whether directly or indirectly.
- (1.20)**Conflict of Interest** means a situation, act, or omission in which there is conflict between personal roles and responsibilities and roles and responsibilities in the company, or conflict between personal interests with the benefits of the company which has an impact on decision making, which may make it impossible to perform duties fairly, to prioritize greatest benefit of the Company, which can lead to corruption and misconduct.
- (1.21)**Facilitation payment** means giving cash, things, or anything other benefit to government employees, government officials, or state enterprise unofficially with the objective is to ensure that government employee,



government officials or state enterprises will facilitate the implementation of the process or as an encouragement for faster implementation.

(1.22)**Hiring of Government Employee / Government Officials** means government personal or state enterprises working in the private sector, or personnel in the private sector working on policy in the government or state enterprises. This creates a risk of corruption in terms of conflicts of interest among individuals who have roles and responsibilities in the two organizations. By making government employees / government officials perform their supervisory duties in an impartial manner or personnel in the private sector trying to push for government or state enterprise policies to benefit their own organization.

2. Scope

(2.1) This Anti-Corruption Policy applies to persons working at all levels of the Company, whether they are contractual, fixed or temporary, consultants, trainees, employees who being sent to work temporarily elsewhere, domestic workers, temporary workers, agents, sponsors or other relevant persons.

(2.2) Compliance with this policy is a condition of employment for all employees and must be observed in all areas where the Company does business.

3. Regulations of the Policy

The Board of Directors, executives and employees will not commit or accept any form of corruption whether for the benefit of the Company, oneself, family, friend, acquaintance, directly or indirectly. The Company regards corruption as illegal and destruction of the credibility of the Company's business operations. Therefore, employees at all levels must comply with this Anti-Corruption Policy which covers all business and all related transactions in order not to cause any damage to the Company and society.

The Company organize a review of the assessment of fraud and corruption risks with appropriate and adequate preventive measures. The Company also are to review, inspect, and improve anti-fraud and corruption policies and measures against fraud and corruption on a regular basis. All of which are to be reported to the Board of Directors annually, to measure effectiveness, and develop measures to be consistent with risks that may change according to changes in business, rules, regulations and related laws.

4. Duties and Responsibilities

To provide clarity in the supervision of anti-corruption matters. Duties and responsibilities have been assigned to the Board of Directors, Sub-committees, Company Directors, Executives, and employees at all levels within the company. The duties and responsibilities as follows:

(4.1) **The Board of Directors** has duties and responsibilities in formulating definite anti-corruption policies and supervising the establishment of an effective anti-corruption system to ensure that the management and employees are aware and value the importance of anti-corruption, and instilled it in the organization culture.

(4.2) **Corporate Governance and Sustainability Committee** has duties and responsibilities to review, inspect, and improve policies, guidelines, and various measures related to anti-corruption. Subsequently, evaluate the performance regularly to measure effectiveness, improve, and develop various measures to be in line with risks that may have changed.

(4.3) **The Audit Committee** has duties and responsibilities in reviewing financial and accounting reporting systems, internal control systems, and internal audit systems. Also, reviewing the internal control system



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regarding anti-corruption, establishing a policy for receiving complaints and reporting wrongdoing, and supervise compliance with anti-corruption measures.

- (4.4) **Risk Management Committee** has duties and responsibilities in supervising regular assessment of corruption risks, and review the preventive measures and risk management measures used to ensure that they are appropriate to keep risks to an acceptable level.
- (4.5) **Executives** have duties and responsibilities in establishing a system and promoting and supporting anti-corruption policies to communicate to all relevant employees, including reviewing the suitability of systems and measures to comply with changes in business, rules, regulations and legal requirements.
- (4.6) **Internal Audit Department** has the duty and responsibility to verify that the operations are in compliance with the Anti-Corruption Policy including guidelines, regulations and regulatory requirements to ensure that there is an appropriate and adequate control system against potential corruption risks and reports to the Audit Committee.
- (4.7) **The Board of Directors, executives and employees of the Company at all levels** must strictly adhere to the Anti-Corruption Policy and Measure. In the case of having doubts or witnessing violations of policies and measures, they must be reported through the complaint and whistleblowing channels, which the complainants will be protected according to measures to protect complainants. There are also penalties in the case of non-compliance with policies and measures related to anti-corruption.

5. Guidelines for Anti-Corruption

☐ General guidelines

- (1) **The Board of Directors, executives and employees of the Company at all levels** must strictly adhere to the Anti-Corruption Policy and Measure without getting involved in any form of corruption, whether for the benefit of the Company, yourself, family, friends and acquaintances, directly or indirectly.
- (2) **The Board of Directors, executives and employees of the Company at all levels** must not neglect or ignore the following:
 - 2.1) When noticing actions that are considered corruption related to the company, the action must be reported through the complaint and whistleblowing channels and cooperate in investigating various facts. In the case of having doubts or questions, please consult the person responsible for monitoring this policy compliance.
 - 2.2) Must not have direct or hidden benefits for oneself, family, friends, and acquaintances, such as any action of selling products and services to the company or compete with the company.
 - 2.3) Act with caution when giving/receiving gifts, items, or services of any value, while following the guidelines for giving/receiving gifts, items, or any other benefits.
 - 2.4) Avoid Entertainment / Hospitality from people involved in business with the company or from others which may benefit from the performance of employees.
 - 2.5) Do not request or receive unfair benefits, business gains, or take advantage of corruption in conducting business, whether directly or indirectly.
 - 2.6) The company give fair treatment and protection to employees who refuse to commit acts that are considered corruption. According to the guidelines and measures to protect complainants as

specified in the Complaints and Whistleblowing Policy. Even if such action will cause the company to lose business opportunities.

- 2.7) Action of those who commit corruption is considered an offense according to the Company's Anti-Corruption Policy and will be considered for disciplinary punishment according to the regulations set forth by the Company in this policy and are punishable by law if the action is illegal.
- 2.8) To create knowledge and understanding in implementing this policy, the Company communicate the Anti-Corruption policy and the complaint and whistleblowing channels through multiples means and channels, such as orientation for company directors, executives, and employees, and organizing training through the intranet network in the organization.
- 2.9) The company places importance on disseminating anti-corruption policies to business partners and business representatives to adhere and implement this policy as well. For transparency and accountability, this include providing communication and publicize various policies related to anti-corruption to the public, third parties, and stakeholders such as business partners and contractors.

☐ **Guidelines on risks related to corruption**

(1) Guidelines for paying facilitation fees

The Company has no policy of paying facilitation fees in any form, directly or indirectly, and will not take any action or accept any action in exchange for facilitating business operations.

(2) Guidelines for Hiring of Government Employee / Government Officials

- 2.1) The Company has a policy of not hiring or appointing Government Employee / Government Official who is still in position.
- 2.2) Set a gap period of 2 years before the appointments of former Government Employee / Government official who resigned from their position or persons who have previously worked for regulatory agencies directly related to the company.
- 2.3) Establish a process for reviewing the backgrounds of individuals to be appointed as company directors, consultants, and executives of the company to check for conflicts of interest before the appointment, and public the history of the person while specifying the reasons for the appointment in the published document to ensure the Company's transparency.
- 2.4) In the case there are personnel in the company working in government policy, the information of such personnel shall be disclosed along with the reasons for working with the government sector in the Company's publications to achieve transparency.

But if performing such duties cause clear conflicts of interest, such as the company's executives taking a position in a government committee, etc. This requires such person to consider leaving the Company to achieve transparency.

(3) Guidelines on risks related to other corruption

Such as Gift and Benefit Policy, Charitable Contribution and Sponsorship Policy, Entertainment and Hospitality Policy, Conflict of Interest Policy, Political Neutrality Policy, etc. The definition, guidelines or various criteria are available in each policy.

6. Reviewing and reporting



The Internal Audit and Compliance department will be responsible for supervising corruption according to the guidelines and plan the annual internal audit. If it is found that there are irregularities or practices that may lead to corruption, the irregularities or practices should be reported to the Audit Committee and the Chief of Staff immediately to determine further solutions, prevention, and penalty.

7. Penalty

Action of Directors, executives, and employees of the Company that violates compliance with this policy is considered an offense according to the company's Anti-Corruption Policy, and will be considered for disciplinary punishment according to the regulations set by the Company and legal punishment if the action is illegal.

This Anti-Corruption Policy is effective from 13 August 2024 onwards.