

Anti-Corruption Policy

1. Introduction

Thai Wah Public Company Limited (“**the Company**”) has created a business operation guidelines, which was set in accordance with good corporate governance and corporate social responsibility practice as well as constantly promoting anti-fraud and anti-corruption practices. The Board of Directors’ Meeting no. 1/2017 on February 21, 2017, had approved the Company to join the Private Sector Collective Action Coalition Against Corruption.

2. Objective

The Company has established Anti-corruption Policy to promote anti-fraud and anti-corruption practices as well as to enhance the efficiency, integrity, honesty and transparency of the anti-fraud and anti-corruption business practices to be in-line with the Company’s core values and to serve as clear guidelines for Directors, Executives, and staff.

3. Definitions

Fraud means an intentional act committed to secure unfair or unlawful gains for oneself or others. Fraud can be broken down into three types: corruption, asset misappropriation and fraudulent reporting, for example, fraudulent financial statements.

Corruption means the misuse of position or power of influence for inappropriate gains for the organization, oneself or others. Corruption includes any types of bribery; an offering, giving, promising or agreeing to give, demanding or accepting money, assets, or other inappropriate benefits from the government officers, government sectors, private sectors, or responsible person either in direct or indirect action so that such person could proceed or disregard his/her function in order to acquire, retain the business, recommend specific company to the entity, or achieve any improper benefits in business transaction. Exception shall be applied in case of laws, regulation, statement, standard, custom, or business traditions enable to do so.

Bribery means the act of paying, offering, promising to pay, receiving, requesting or soliciting anything of value, such as assets, money, things, rights or other advantages that are against good ethics, conduct,

rules, regulations or laws with government officials, government organization, private organizations or other individual(s) - directly or indirectly - in order for that person to wrongfully act or wrongly refrain from performing their duties to receive or retain benefits that are inappropriate for the business.

Political Contribution means monetary or non-monetary support provided to a political party, representative of a political party, politician or candidate for election. As such, non-monetary political contributions include lending or donating any equipment for free of charge.

Charitable Contribution and Sponsorships means grants or contributions paid to individuals and/or organizations of the public and private sector including the reasonable charities. The objective is to support business operations, brand promotion or the Company's reputation which useful for creating a reliable trade, strengthen a business relationship and in accordance with the Company's Code of Conduct that focus on accuracy, transparency and good Corporate Governance in the business.

Facilitation payment means a small amount of expenses unofficially offered to government official to make certain that such government official will proceed according to or fasten the procedures in which do not require their judgements and is considered an act of duty of such government employee or government official. Also, such duty is deemed a right to which the Company shall be entitled, for example, request for an authorization, certification, and receipt of any public services etc.

Revolving Door means person who is or had been a government official who joins a company and uses their previous relationship or insider information to benefit the company or incurred any conflicts of interest resulting from performing the duties of such government agency or regulators in which the company is under their supervisions. Whereby such action aims at creating advantageous, disadvantageous, or unfair business operation or the specification of policy which benefits the company where such former government official has worked for.

Government employee/ government official	means	a person holding a political position, a government officer or local government employee who holds a position or earns a monthly salary, a staff or a person who performs his/her duty in a state enterprise or government agency, a local executive and member of a local council who does not hold any political positions, a legal officer of local administration and shall include a director, a subcommittee, employee of government sector, state enterprise or government agency and any persons or group of persons who exercise their authority or have been assigned to exercise their government authority to act in any ways according to the specified law, whether such establishment has been set up in the bureaucracy, state enterprise or any other government businesses. (Reference: The Organic Act on Counter Corruption B.E. 2561)
Conflict of Interest	means	performing duties that must produce results or benefits that meet the objectives of the Company but instead providing benefits for oneself or other related parties, causing the Company to not receive the maximum benefit or may cause damage to the Company.
Stakeholders	means	persons/entities directly or indirectly impacted by the Company's business or involved with the Company's interests or impacting on the Company's business, such as the Company's directors, shareholders, customers, suppliers, competitors, creditors, employees, social and communities and environment.
Gift, souvenirs, assets, or any other benefits	means	Thing of monetary or sentimental value that is offered on momentous occasions in accordance with common norms and culture, to reward, honor, support, or to be given purely out of goodwill. They could be benefits for receiving services, entertainments, leisure activities, or covering for costs associated with travel, accommodation, food, or any other similar nature, such as tickets, lotteries, etc. It also includes gifts given as a gesture of goodwill or in accordance with regional customs, such as birthday or New Year's gifts or gifts to celebrate a new job etc. is the definition also including anything of value that is given to or transferred to another person without any expectation of receiving anything in exchange, giving and receiving commissions, loans, or profit sharing as gifts, stock certificates and other similar items

are absolutely prohibited. The Whereby, the Company understands that it can be challenging to completely refrain from giving or receiving gifts.

Hospitality& Entertaining expense means reception, banquets as well as participating in recreational events or activities such as celebrations, sporting events, or other activities with similar nature, etc.

4. Scope of the Policy

This Policy is applicable to all levels of employees including Directors, Executives, employees in the head office or working abroad, the factory workers, trainees, contract-based employees, or any other relevant persons. All must strictly comply with the Anti-corruption Policy as well as the additional guideline.

This Policy is also applicable to the employees of the subsidiaries companies.

5. Anti-Corruption Policy

Directors, Executives and the Company's staff are prohibited from operating or accepting any type of corruptions either direct or indirect manner, in all businesses or from any concerned parties. The anti-corruption practices are required to be consistently counter checked as well as the Anti-corruption policy and business operation guidelines are to be reviewed regularly to reflect the changes in business, regulations and applicable laws.

Guidelines

1. Executives, the Company's staff or persons acting on behalf of the Company, shall not request, provide, persuade or promise to provide or accept bribery or any forms of inappropriate payments including facilitation payments.
2. The Company's staff shall not be negligent in any corruption conditions involved directly with the Company. All staff must notify such act to supervisors or responsible person, as well as provide cooperation in the investigation process.
3. The Company shall provide fairness and safeguard staff who informs corruption cases relating to the Company by applying Protection Policy for appellant, witness or persons who incorporate with Anti-corruption information as stated in the Whistleblowing Policy.

4. A person who commits the corruption is to be considered disciplinary action followed by the Company's standard. Besides, possible legal penalty may be applied, if such act violates the laws.
5. The Company shall disseminate, share the knowledge and establish a common understanding with other people who are involved or affect the Company, especially on matters involving Anti-corruption Policy.
6. This Anti-corruption Policy covers to Human Resource Management process starting from recruitment, selection, promotion, training, evaluation, compensation and benefits provided to staff. All supervisors at all levels must communicate and establish common understanding of the policy with staff to apply in the business activities under their responsibility and to monitor the effectiveness of implementation.
7. Charitable contributions and sponsorships to individuals or organizations, to both government or private sectors, must be transparent for charity purposes, and not be made with the expectation for favorable treatment in return that may be considered as fraud or corruption. The request and approval processes must be performed in accordance with the Company's guideline on charitable contributions and sponsorships.
8. The provision and acceptance of gifts are permitted according to local tradition. However, the Company does not encourage its staff to accept gifts from business partners beyond reasonable amounts. The provision and acceptance of gifts must not be made for influence to impair the objectivity.
9. The Company prohibits the provision or acceptance of gifts that include advantages in exchange for the business treatment/agreement in return.
10. The Company's staff shall avoid providing or accepting gifts or other advantages that may constitute bribery or raise suspicions about integrity issues or conflicts of interest which may impact the Company's reputation.
11. The Company prohibits providing or accepting money, services, gifts, or anything of values to/from government officials or the private sector in exchange for benefits or inappropriate business advantages.
12. The request and approval process for gifts must be performed in accordance with the Company's Announcement or guideline on gifts.

13. The Company's staff shall create and sustain organization's culture representing that corruption is unacceptable in every business transaction dealing with both public and private sectors. All staff shall raise awareness by working honestly, ethically and transparency without engaging in fraud and corruption.
14. The Company adopts a political neutrality policy and will not participate or make a political contribution to any activities of political parties, political groups, or politicians, whether directly or indirectly. The Company shall not allow political supporters to use the Company's resources or premises for political activities.
15. The Company has no policy to demote or punish or mistreat any employee who denies corruption even though it may cause the Company to lose business opportunity.

6. Roles, Duties and Responsibilities

1. The Board of Directors is responsible for establishing policies, monitoring, and forming an effective system or guideline supporting Anti-corruption practices in order to affirm that the Management or the Executives intensively emphasize Anti-corruption.
2. The Audit, Risk and Corporate Governance Committee is responsible for revision of financial and accounting reports, internal audit, risk management process, anti-corruption policies and measures including reviewing the guidelines for monitoring and implementing the Anti-Corruption Policy to ensure the appropriateness and efficiency of the internal controls.
3. The Chief Executive Officer and the Executives are responsible for establishing guidelines or implementing methods to support the Anti-corruption Policy, as well as for setting communication channels and organizing training program relating to the Anti-corruption Policy, regulations and implementation methods/procedures for staff, personnel and all related persons. They also are responsible for reviewing the appropriateness of related procedures to align with any changes in business, procedures, regulations and applicable laws.
4. The Company's staff are responsible for complying with the Anti-corruption guidelines and all related announcements. The Company's staff must report to their supervisor or to a designated reporting channel, when they have any queries or encounter any suspicions of fraud or breach of the Company's regulations.

7. Measures

Procedures for monitoring risks from fraud and corruption

1. Put in place the audit process, internal control and risk management systems covering key operating systems, such as, purchasing, account recording and payment systems, etc., aiming to prevent and monitor fraud and corruption risk.
2. Set forth a risk management system suitable to the Company's business nature by identifying risks level from fraud and corruption that may arise and establishing appropriate preventive measures, measurement methods and resources required to mitigate the risks and evaluating the performance under the established risk management plan.

Guidelines for Monitoring and Evaluating the Implementation of the Anti-Corruption Policy

1. Internal Audit Unit is set up to oversee the internal control system, corporate governance and to provide recommendations continuously by conducting audit in accordance with the annual audit plan including reporting significant results with recommendations to the Audit, Risk and Corporate Governance Committee.
2. Risk Management Department is responsible for evaluating the fraud and corruption risk on a regular basis to ensure that the Anti-Corruption Policy is implemented effectively, including monitoring, reviewing and improving the guidelines on a continuous basis, with the assessment results being presented to the Risk Committee and reported to the Audit, Risk and Corporate Governance Committee.
3. If there is an action that may have a significant impact on the Company's financial position or operations, including an offense or breach of laws or the Company's Code of Business Conduct or guidelines for the Anti-Corruption Policy, the Audit, Risk and Corporate Governance Committee will report such matters to the Board of Directors.

8. Communication

This Policy is communicated to all levels of the employees. In addition, channels are provided for internal whistleblowing, complaints, or suggestions as well as training and taking tests to ensure that they have sufficient understanding for complying with the Policy.

9. Disciplinary Actions

Policies and guidelines on anti-corruption are parts of the work disciplines for the Company's directors, executives, and employees. Negligence and ignorance to comply with the Company's policies and guidelines is considered breaches of discipline. Punishment will be in accordance with the Company's rules. However, if the act is also against the law, the Company will consider to proceed accordingly.

The Additional Guideline

The Chief Executive Officer has the authority to order or establish the additional guideline to align with the Anti-corruption Policy.

Related Policies

- **Political Contributions Policy**

The Company shall maintain a neutral stance in politics and, hence, does not make any political contribution in any forms whatsoever. Nonetheless, the Company recognizes and respects the freedom of employees to exercise their political rights, such as voting or belonging to a political party.

Guidelines

1. Avoiding any act that others might construe as signifying the Company's involvement in, or supporting or preferring to a political program or party, political group, person with political influence or election candidates.
2. Exercising the political right on your behalf and avoiding any activity influencing other people to believe that it is done on the Company's behalf.
3. Refraining from expression of political opinions at the workplace or during working hours, as this might lead to conflict.

- **Charitable Contribution and Sponsorships Policy**

The Company has a policy and guidance for charitable contributions and giving money to people in public or private organizations, as well as charitable organizations. It must be transparent and aims for the charity does not expect the benefits or any other consideration that may be considered dishonest and corrupt.

Guidelines

Charitable contribution and sponsorship to public and private sector individuals/institutions, and charitable organizations must be proceeded under the following conditions:

1. Organizations that are credible, and legally established.
 2. The charity contribution must be under the Company's name, and are made in a transparent and legal manner, in compliance with the Company's rules and regulations and Delegation of Authority. Proofs of contribution must be clear and accountable.
 3. Donation should not be made under an individual's name unless specified in the request for sponsorship, and with written proof of request of sponsorship. Payment will not be in cash.
 4. Monitoring should be conducted to ensure that the donation and sponsorship fund are used genuinely for charity, or in accordance with its purpose (without any hidden agenda nor for improper business interests).
 5. Employees are to seek approval according to the Company's reimbursement procedure and the Delegation of Authority prior to actual reimbursement of charity contribution and sponsorship fund. In the reimbursement request, names of charitable institution/organization, and rationale must be specified for traceability purpose.
- **Facilitation Payment Policy**

The Company strictly prohibits offering facilitation payments to any government official under any circumstances. Allowing the Company's personnel to engage in such payments poses a high risk of bribery, increases business costs, and jeopardizes the Company's reputation and image. This practice directly violates the Company's policy on Anti-corruption.

Guidelines

1. Any facilitation payments which potentially lead to corruption must be prohibited.
2. The Company does not have the policy to offer any facilitation payments in any forms, whether directly or indirectly, which may imply fraudulent and corruptive behavior.

- **Revolving Door Policy**

The employment of any government employees or government officials who are within a scope of revolving door and is considered against good corporate governance principle means that such person who is or had been a government official, politician, advisor of a government agency has come to work with the Company and has taken advantage of the relationship or misused inside information to benefit the Company or incurred any conflicts of interest resulting from the act of duty of the government agency or business governance organization and the company under supervision whereby such action aims at creating advantageous, disadvantageous or unfair business operation or the specification of policy which benefits the Company where such former government employee or government official has worked for. This in turn, may incur risk of corruption in terms of conflicts of interest of an individual who has a role in both organizations.

The revolving door policy must be enforced with the employment of the executive, staff and employee of TWPC Public Company Limited and subsidiaries (TWPC Group) under the Labor Law/ Labor Protection Law. Nonetheless, to ensure transparent administration and clear operation practices with the aim of preventing corruption.

Guidelines

1. The Company shall not consider an employment or appointment of a government official who still holds position, except only in a case of a state enterprise or government agency or government sector with the specification from the establishment agency or being authorized by the relevant law or being allowed to have a representative from such agency to perform his/her respective duty in the organization. However, this must be proceeded according to lawful procedures and objectives.
2. To prevent any conflicts of interest between personal interest and public interest; the employment of former government official whom had been employed by government agency in which the Company used to be under the governance, supervision, control, or inspection; or the employment of a person who used to work for the Company's regulators. The Company; therefore, shall consider a cooling-off period for 2 years. (Referred from Section 127 of the Organic Act on Counter Corruption B.E. 2561)
3. The selection, employment approval and determination of compensation in hiring a government official to hold a position of Chief Executive Officer and President or Vice President must be carefully considered by the Nomination and Remuneration Committee and/or a related sub-committee appointed by the Company's Board of Directors as well as must be approved by the Board of Directors.

4. The selection, employment approval and determination of compensation in hiring a government official to hold a position of employee at a level of Assistant Vice President and lower or a consultant must be considered such necessity as well as must be approved by the Chief Executive Officer and the President.
 5. The Company has determined background verification of a person who is being nominated to hold a position of the Chief Executive Officer and President, a consultant and senior executive of the Company to inspect for any potential conflicts of interest before appointment.
 6. It is prohibited to hire any government official if such employment is intended to benefit the Company or may incur reciprocal benefit and must not involve or must not be for an abuse of power or must not incur any conflicts of interest; for example, disclosure of confidential information of the government agency where such government employee or government official used to work under, any lobbies to gain benefits wrongfully or any assignments to contact former agency where such government employee or government official used to work under.
 7. The Company shall disclose information on the employment of government employee or government official, coupled with reason of appointment in the One Report for transparency purposes.
- **Conflicts of interest Policy**

The Company expects all employees to avoid conflicts of interest when engaging with delivery persons, customer service representatives, or any other individuals or organizations involved in business transactions with the Company. The objective of the conflict-of-interest policy is to ensure that all employees prioritize the best interests of the company and do not seek personal benefits that may compromise their judgement. All decision made by the employees should be based on honesty, transparency, and compliance with legal and ethical standards.

Guidelines

Employees must avoid and not be involved in activities and situations that may cause conflicts of interest that affect any decision making with guidelines for practice as follow:

1. For actions and decision making that could cause a conflict of interest, employees must report the matter by line command and approval by the Executive Management (EXCO). To ensure the removal themselves from such decision-making. This report should be submitted to Human Resources.

2. Employees or related persons must not use their position to gain any form of personal benefit without benefit to the company.
3. Employees or related persons must disclose any interest they have in organizations that have contact or business engagement with the Company. They are not allowed to engage in practices that give them unfair advantages without review by line command and approval by EXCO. (Related persons include family members such as father, mother, spouse, child, adopted child, sibling, spouse of child and adopted child. Non-compliance may result in disciplinary action).
4. Employees involved in approving or conducting business contracts with related persons must report the relationship to review by line command and approval by EXCO. This report should be submitted to Human Resources.
5. Employees are prohibited from holding positions as directors or shareholders (except shares in the stock exchange) in other organizations that have conflicting interests with the company. Unless the organizations are non-business entities or business organizations that do not operate in conflict with the Company's conflict of interest policy. The Company encourages employees to serve as directors in non-business organizations and utilize their skills to contribute to the development of such organizations as responsible members of society. Prior written notification is required, using a form to request exemption from serving as a director in another company. For review by line command and approval by EXCO. This form should be submitted to the Human resources department.
6. Employees do not possess the authority to disclose the Company information, including meeting resolutions, work plans, bidding information, etc., for personal gain that is detrimental to the Company, regardless of whether they are still employed by the Company or their employment has been terminated.
7. Employees are required to sign a memorandum acknowledging their adherence to the Company's Code of Business Conduct. This memorandum should be sent to review by line command and approval by EXCO on an annual basis.
8. The Company is responsible for producing an annual summary report that outlines the acknowledgment and confirmation of compliance with its business policies and ethics. This report is to be reviewed and approval by EXCO.

- **Gift and Hospitality Policy**

Giving and receiving of valuable items such as presents or souvenirs, services, facilitating or entertainment of business associates must follow the local traditions of each country including relevant laws. At the same time, it should be of reasonable value and does not influence the employees into wrongdoing.

The Company prohibits to give gifts in the form of cash on behalf of the Company, or receiving a gift in cash, except in cases clearly specified in the message below. In addition, giving or receiving gifts, convenience, and other benefits are as follows:

- Should be reasonably infrequent and suitable for the occasion.
- Complies with the company's policies on business ethics and conflict of interest.
- The Company expects all employees to perform their duties with honesty and integrity, refraining from requesting or receiving gifts, assets, or any other benefits from business partners or those involved with the Company's business.
- In order to make business decisions that are correct and ethical within the applicable laws.
- Employees must adhere to good behavior and traditions. The company also prohibits employees from receiving gifts, souvenirs, or participating in entertainment activities with excessive value.

Guidelines

Giving

1. For non-cash gifts such as pens, flowers, golf balls, etc., the Company has set approval limits for gifts. Which is not a cash gift without exceeding normal limits (3,000 baht) according to delegation approval authority table set by the company.
2. In case of gift giving in the form of cash, the Company allows the payment in the form of cash only in certain cases, such as weddings, funerals, Kathin ceremonies, etc., with the intent of this policy to limit the amount of cash given according to local customs.

Cash includes the purchase of a gift check from a bank or coupons from stores that are paid on behalf of the recipient. The Company has set a limit for approving monetary gifts per person per time. Delegation approval authority is in accordance with delegation approval authority set by the Company.

- 2.1 In the case that many employees are invited to attend the same event, the employees who is the contact person of the recipient should be responsible to request review by line command and approval according to the delegation approval authority set by the Company. Attention should be paid in the case that the amount of money given to the recipient from the same organization for suitability in business relationships.
- 2.2 All gifts must be expensed in the regular expense claim form by employees, with a clear recording of the purpose and recipient.
3. Before giving or accepting a present and hospitality to/from business associates, the employees should make sure that the price is appropriate to the occasion and complies with laws, regulations, announcements or custom in each locality.
4. Do not provide assets, services, or entertainment that may cause influence or the motivation to make a particular decision and cause the performance of duties unfairly.
5. Approval must be sought giving non-cash gifts and cash gifts, and report should be made through the Gift System. For review by line command and approval in accordance with the delegation of approval authority specified by the company. A copy of the report should be recorded and sent to Human Resources.

Receiving

Gifts and souvenirs that employees may receive should not exceed the reasonable limit (3,000 Baht) in value, including items like calendars, stationery, notebooks, umbrellas, etc. The production of gifts bearing the company's logo for individuals or units can be undertaken within reasonable and business-appropriate value limits set by the company.

1. Before receiving from business associates, the Employees should make sure that the value is appropriate to the occasion and complies with laws, regulations, announcements or custom in each locality.
2. Do not accept assets, services, entertainment, or endorsements that could potentially influence or motivate unscrupulous decision-making or lead to unethical conduct in any way.
3. When receiving gifts, rewards, and services, report to line command and record in the gift system. A copy of the report should be sent to Human Resources.

Hospitality

In the course of conducting the company's business, employees may incur expenses for entertainment or receiving endorsements that align with the local culture and customs, with a generally moderate value. and hospitality should not be frequent, and it should be within reasonable limits that correspond to the business responsibilities of each individual. It should be of a reciprocal nature to be considered a normal expense in conducting business.

1. Before hospitality to associates, the Employees should make sure that the value is appropriate to the occasion and complies with laws, regulations, announcements or custom in each locality.
2. Avoid hospitality that can cause influence to impair the objectivity and wrongfully act.
3. Keeping records of expenses as evidence of the value of the items service or hospitality so that it can be verified. By recording the objective participant hospitality and the organization clearly state that hospitality expenses must be approved according to the Delegation Approval Authority set by the company.
4. Employees should not provide or accept extravagant entertainments, including providing or accepting travel by various modes of transportation, accommodation in expensive hotels, or the use of lavish facilities. In cases where it is necessary, approval must be obtained from the approval authority as specified by the company.
5. In the case that Employees have been assigned or permitted by their superior to an outside agency, they may receive services and hospitality items, or presents according to the guidelines or standards set by the outside and according to the Delegation Approval Authority set by the company.
6. The attention should be paid when to the superior or internal people/units, services and hospitality from the subordinate or internal people/units. Such activity must not create motivation leading to unfair decision making and according to the Delegation Approval Authority set by the company.

- **Compliance Policy**

The Company has formulated this compliance policy as a guidance in overseeing that its operations is conducted properly and strictly adhere with the laws, rules, regulations, orders and announcements, both internally and externally. The guidelines have been set as follows:

1. Directors, executives and all employees must adhere to conduct businesses in compliance with the relevant laws, rules and regulations, orders, while maintaining righteousness, social responsibility, environment, and implementing anti-corruption practice to achieve sustainable organizational development.
2. In performing their duties, the executives and employees shall strictly comply with the relevant laws, rules, regulations, and requirements imposed by the relevant external agencies, and the Company's rules or guidelines.
3. Regulatory compliance constitutes part of the duties that each director, executive, and employee shall fulfill actively, by initiating communications, encouraging and supporting for knowledge as well as understanding, issuing compliance guidelines and ensuring the correct implementation, including raising awareness and further fortifying the Company's culture that adheres to honesty, integrity and strengthening compliance.
4. The executives and employees are committed to comply with the Company's current policies and those to be issued in the future, including placing great importance on keeping confidential information within its possession in strict confidence by adhering to the relevant laws and business ethics and will not disclose or exploit such information that will damage other parties or to the Company.
5. Any employees who reports or provides information on an act that is or may constitute a violation of any law or regulations will be protected in accordance with the Company's Whistleblowing Policy.

Roles and Responsibilities

1. To provide consultation to the employees and executives on any laws, rules, regulations, criteria, orders and notifications which may impact on the Company's business operation and to inform the management level of any change to those laws and regulations without delay.
2. The Compliance Department must review its framework on a regular basis in order to be consistent with international practices, suggestions from the Board of Directors, and the internal audit functions.
3. Encourage and support for knowledge, understanding and ensure that all departments perform their guidelines correctly and comply with the laws, regulations and the Company's code of conduct.

- **Whistleblowing Policy**

Board of Directors had approved the Whistleblowing Policy as a mechanism for the Company's employees and third parties to report any misconduct, or file for grievances without being discriminated or mistreated should they be aware of any wrongdoing, or fall victim to fraud and corruption, or violation of laws / Company regulations.

Whistleblowing Channel

- Telephone: 66 2 285 0040 ext. 2701
- Facsimile: 66 2 285 0255
- Postal mail: Head of Internal Audit Unit
Thai Wah Public Company Limited
21/11, 21/13 Thai Wah Tower 1, 6th Floor
South Sathorn Road, Tungmahamek, Sathorn
Bangkok 10120, Thailand
- Email: The Chairman of the Board - bod@thaiwah.com
The Chairman of Audit, Risk and Corporate Governance Committee - arc@thaiwah.com
Head of the Internal Audit Unit - ia@thaiwah.com
- Website: www.thaiwah.com

Whistle-Blowing Reporting Procedures

1. The whistle-blower can complain via whistleblowing channels verbally or in writing.
2. If the whistle-blower wishes not to disclose his/her name, there must be sufficient factual details or clear evidence to provide grounds for believing that a violation of laws, rules and regulations or the Company's Code of Conduct had occurred in the Company's business.
3. The complaint shall be deemed confidential. However, if he/she does disclose his/her identity, this would allow the Company to report him/her the outcome of the investigation or additional particulars concerning the matter of complaint.

Investigating the Facts Procedure

1. Upon receiving the whistleblowing, the Internal Audit (IA) team as assigned by the Audit, Risk and Corporate Governance Committee (ARCG) will gather all the reported cases and ensure that the issues raised are professionally and independently addressed.
2. IA team will then investigate, access and propose the appropriate procedures for managing the whistleblowing to the ARCG.
3. The ARCG will consider the results and enforced the disciplinary actions based on the Company's rules and regulations and/or file the police report.
4. The ARCG Chairman will then report the conclusions of the investigation to the Board of Directors.

Mechanism to Protect Whistle-Blowers

1. All concerns and irregularities will be treated confidentially and access to the information will be limited only to responsible persons. Any information of the whistle-blower will not be disclosed.
2. The collaborator and the officers involved in the investigation will be protected as well as the whistle-blowers.
3. If the whistle-blower made an allegation in bad faith or for personal gain, appropriate action will be taken against him/her which might be disciplinary action and/or legal prosecution.
4. If a whistle-blower believes that he/she is being subjected to discrimination, retaliation, or harassment for having made a report, he/she should immediately report those facts to the Board of Directors or the Audit, Risk and Corporate Governance Committee or the IA Team through one of the above whistle-blowing channels.
5. Those who receive harm will be compensated in a fair and appropriate manner.

This Anti-corruption Policy has been reviewed by the Audit, Risk and Corporate Governance Committee's Meeting No. 4/2023 and approved by the Board of Directors' Meeting No. 4/2023 held on November 9, 2023 and November 14, 2023 respectively.



(Mr. Ho Ren Hua)
Chief Executive Officer