

Anti-corruption Policy

TQM Alpha Public Company Limited

In order to comply with the principle of corporate governance and corporate responsibilities towards society and stakeholders, and to provide guidelines for the conducts of the Company's directors, executives, and employees;

The Company recognizes the significance and urgency of combatting all forms of corporate corruption. Whether it involves presentations, pledges, requests, claims, bribes, or any other behavior that promotes corruption, The Company remains steadfast in its commitment to opposing such practices. Furthermore, The Company has joined the "Thai Private Sector Collective Action Against Corruption" to showcase its unwavering dedication to combating corruption in all its manifestations. It adheres to the principles set forth in the collective's declaration of intent to resist corruption in any form. This commitment has been effectively communicated to all Company personnel.

The meeting of the Board of Directors No. 4/2018 reviewed a self-assessment concerning the guidelines on anti-corruption measures dated 17th October 2012, which covering various aspects. The review included the following details:

1. Definitions

Personnel of the Company refers to a director, executive, or employee of the Company;

Corruption refers to the act of performing or omitting assigned duties in a person's position, or misusing entrusted power or authority from that position, in contravention of the law, ethics, regulation, policy, or the Code of Conduct of the Company in order to gain any form of undue benefits, which includes giving and accepting bribes, offering, promising, soliciting, or demanding money, property, or other benefits in an inappropriate manner, contradicting good morals, ethics, the law, regulations, and policies, whereas the other party is a government official, government agency, private entity, or a person with a business relation, in order to have such person perform or omit to perform his or her duty for the purpose of acquiring, providing, or retaining business or any other undue benefit, whether such benefit is for an organization, him or herself, or any other related person, including giving or procuring confidential information, unless it is permissible under the law, regulations, notifications, rules, local customs or trade practices.

Political Contributions refer to any form of financial assistance or other types of support provided to endorse political activities. This can include providing loans, goods, or services, advertising promotion, or supporting political parties. It also includes purchasing tickets to fundraising events or donating money to organizations closely associated with political parties. Additionally, it involves granting employees leave without pay or serving as representatives of the company to participate in political campaigns, among other activities.

2. Roles and Responsibilities

- 2.1. The company's board of directors is responsible for establishing policies and overseeing the implementation of an effective anti-corruption support system. This is to ensure that all employees in the company understand and are aware of the importance of combating corruption and instilling a culture of integrity within the organization.
- 2.2. The Audit Committee is responsible for reviewing financial and accounting reports, internal control systems, internal audit systems, and appropriate and effective risk management systems. They also handle reports of whistleblowing related to corruption committed by individuals within the organization, conduct factual investigations, and present the findings to the board of directors for consideration of penalties or resolution of the issues.
- 2.3. The Governance Committee is responsible for overseeing and ensuring compliance with governance policies, ethical business practices, and policies and measures to combat corruption.
- 2.4. The Risk Management Committee is responsible for assessing risks related to corruption, as well as developing measures and guidelines to prevent risks arising from corruption. They present their recommendations to the Audit Committee and the Governance Committee.
- 2.5. The Executive Committee, Managing Directors, and Executives have the responsibility to implement anti-corruption policies by establishing supportive systems and communicating them to employees and stakeholders. They also review the appropriateness of systems and measures to align with changes in business, regulations, laws, and requirements.
- 2.6. The Internal Auditor is responsible for auditing and verifying that the operations are conducted correctly according to policies, practices, delegated authorities, regulations, and laws. They ensure that control systems are appropriate and effective in combating corruption and report their findings to the Audit Committee.

3. Guidelines for Combating Corruption

The company has a zero-tolerance policy towards corruption, covering all business operations and transactions in every country and related entities. Employees of the company and its subsidiaries must adhere strictly to the anti-corruption policy, corporate regulations, and business ethics (Code of Conduct). They are strictly prohibited from engaging in any form of corruption, whether it is direct or indirect. The following practices must be observed:

- 3.1. No behavior should be demonstrated with the intention of engaging in corrupt practices, such as offering or accepting bribes to or from government officials, private individuals, or parties involved with the company, in order to gain or maintain a business advantage, compete unfairly, or benefit themselves or related parties. This includes not giving or receiving bribes from any person in connection with work, including government agencies, to obtain illegitimate benefits.
- 3.2. No negligence or indifference should be shown when encountering actions that fall within the scope of corruption practices related to the company. It is a responsibility to report such incidents to superiors or individuals responsible and cooperate in investigating the various allegations.

- 3.3. The company will ensure fairness and protection for individuals who refuse to engage in corruption or report incidents of corruption to the company, as outlined in the whistleblower protection measures or policies for reporting corruption and misconduct.
- 3.4. Individuals involved in corruption will be considered a violation of ethics and will be subject to disciplinary actions as defined by the company's employee regulations. They may also face legal consequences if their actions are in violation of the law.
- 3.5. The company recognizes the importance of dissemination, knowledge sharing, and fostering understanding among individuals who have responsibilities related to the company. Failure to comply with the policies against corporate corruption may have an impact on the company.
- 3.6. The company has established appropriate and efficient internal auditing processes and control systems to prevent instances of corruption.
- 3.7. The company has implemented human resource management processes that reflect the company's commitment to combating corruption, starting from selection procedures, training, performance evaluations, compensation, and promotion.
- 3.8. The company has a policy to comply with relevant laws and standards regarding the prevention of corporate corruption in Thailand and in every country where the company's representatives conduct business on behalf of the company.
- 3.9. This policy extends to agents, contractors, or any individuals acting on behalf of the company, as well as the company's subsidiaries.
- 3.10. To ensure clarity in dealing with high-risk situations related to corruption, the company's directors, executives, and employees at all levels must exercise caution and fulfill the following responsibilities:
 - 3.10.1. Political Assistance
 - (1) The company conducts its business in a politically neutral manner, refraining from providing support or engaging in activities that promote any specific political party.
 - (2) The company does not provide financial support or assets to any political party, politician, or political candidate with the intent of furthering the company's business interests.
 - (3) Company personnel must engage in business activities impartially, without affiliations or endorsements of any political party or professional politician. They must not provide financial support or assets to any political party, politician, or political candidate with the intent of furthering the company's business interests.
 - (4) Company personnel have the freedom of political participation under the provisions of the Constitution. However, they must not covertly claim to be employees or utilize company property, equipment, or tools for any political activities. If participating, they must exercise caution to ensure that no actions create a perception of the company's support or endorsement of any specific political party.

3.10.2. Donations and Sponsorships

- (1) Donations, whether in the form of financial assistance or other forms such as knowledge sharing or volunteering, may be undertaken by the company as part of its corporate social responsibility activities, as well as for public relations and enhancing the company's image. These donations should not be claimed for reciprocal benefits from the recipients, and the company should not expect any business returns.
- (2) Monetary or asset sponsorships for activities or projects must be carried out transparently and in compliance with the law. The donations should be made in the name of the company, following the approval process specified by the company's regulations. It should be ensured that such sponsorships are not used as a means to evade giving bribes. The purpose of providing sponsorships should be to promote and enhance the company's business and image, and can be done in various forms, such as supporting cultural events, social and environmental activities, educational and sports initiatives, among others.
- (3) Company personnel and subsidiaries must exercise caution to avoid using donations and sponsorships as a cover for bribery. The process of donating to charitable causes and providing sponsorships should be transparent and in compliance with relevant laws and regulations. A written request stating the purpose of the donation or sponsorship, along with supporting documentation, should be submitted to the authorized approver at each level.
- (4) Clear and credible evidence of donations and contributions to charitable causes must be maintained to ensure that sponsorships and donations are not used as a pretext for corrupt practices.

3.10.3. Gifts and Entertainment

The company recognizes that building good relationships with business partners is essential for the continuous success of the company. Therefore, the company has established the following practices:

- (1) Company personnel may give gifts and provide entertainment to business partners if they meet the following conditions:
 - (a) It is not done to gain personal advantages through inappropriate or covert means, such as bribery or undisclosed assistance or benefits.
 - (b) It complies with relevant laws, regulations, and company guidelines.
 - (c) It is given on behalf of the company, not in the name of an individual employee, and it is done openly without concealment.
 - (d) The type and value of the gift or entertainment are appropriate and in accordance with the occasion. For instance, in cases where a bidding process

is ongoing, gifts or entertainment should be avoided for government officials, company employees, or related units.

- (e) It is suitable for the situation, such as giving small gifts during important festivals as a customary practice.
 - (f) The exchange of gifts is transparent.
- (2) Company personnel may receive gifts or benefits on occasions or customary practices, provided that the value does not exceed 3,000 baht (three thousand baht). Cash or cash equivalents, such as gift cards, are not acceptable. If it is impossible to refuse a gift or benefit in that situation, the recipient must immediately inform their superior and report the gift to the company's Compliance and Secretarial Office. The gift will then be used as a reward for employees during important festivals, or approval will be sought to donate it to charitable purposes as deemed appropriate.

4. Communication and Training

- 4.1. The company will facilitate communication and dissemination of its anti-corruption policy to its employees and individuals in all unit levels within the company, including subsidiary companies, through various channels such as orientation programs for new directors and employees, training sessions or annual seminars, announcements on bulletin boards, intranet systems, emails, and the company's website. Additionally, training for company personnel and subsidiary employees will be provided to raise awareness of different forms of corruption, associated risks, and methods of reporting. This training will be part of the onboarding process for new employees of the company. Furthermore, the company promotes training for its personnel to foster honesty, integrity, and responsibility in carrying out their duties and responsibilities. This is aimed at creating a shared understanding regarding the giving and receiving of gifts, assets, or other benefits, as well as entertainment expenses related to business objectives or customary practices. It also includes providing financial support, donations for charitable purposes, and assisting and supporting political activities.
- 4.2. The company will communicate and disseminate its anti-corruption policy, including channels for reporting or lodging complaints, to the general public, subsidiary companies, associates, business partners, and stakeholders through various means such as the company's website, annual reports, which include annual data disclosure, and other channels. This is to enhance understanding and support for adhering to the standards of social responsibility in combating corporate corruption, in line with the company.
- 4.3. If any company personnel have any questions or concerns regarding this policy or the measures to combat corporate corruption, they are encouraged to contact the Secretariat of the Audit Committee for assistance.

5. Punishment

Any individual who intentionally fails to comply with this policy, engages in behavior that intimidates, threatens, or retaliates against the person reporting a complaint or disclosure, or any individual associated with the complaint or disclosure under this policy, shall be deemed to have violated discipline and shall be held responsible for compensating any damages incurred by the company or individuals affected by such actions, as well as facing civil and criminal liabilities or any other relevant legal consequences.

6. The measures and channels for reporting and filing complaints or grievances (Whistle Blower)

The company establishes mechanisms for receiving complaints and taking action in cases where there are allegations or disclosures related to illegal activities, regulations, the Code of Conduct, or behaviors that may indicate corporate corruption by company personnel. These mechanisms include appropriate safeguards for whistleblowers, as outlined in the Whistleblower Policy for reporting allegations of corruption and misconduct, to provide clear guidelines and ensure an effective process for receiving complaints of corruption and misconduct. The relevant details regarding the procedures for reporting allegations of corruption and misconduct by the company are specified in the company's Whistleblower Policy.
