

(Translation)



**Anti-Fraud and
Corruption Prevention Policy
ARIP Public Company Limited
20 February 2025**

Reviewed and Approved by the Board of Directors of ARIP Public Company Limited

On February 20, 2025

Anti-Fraud and Corruption Prevention Policy

ARIP Public Company Limited (the “Company”) is committed to combating and preventing all forms of fraud and corruption, whether direct or indirect, by not tolerating any behavior concerning fraud and corruption.

To ensure clarity and define relevant responsibilities, guidelines and rules regarding for combatting and preventing fraud and corruption, the Company has established this Anti-Fraud and Corruption Prevention Policy. This policy applies to the Company, directors, executives, employees and all stakeholders, requiring strictly compliance without exception. The policy focuses on the transparency and integrity in communication among staff and departments, in order to avoid any inappropriate practices and any conflicts against the principles of good corporate governance. Furthermore, the policy combats and prevents bribery of any form that may benefit the Company, with disciplinary penalties imposed on violators.

1. Definition

“Fraud” means any act to unlawfully obtain a benefit for oneself or others. This includes the following acts:

- (1) “Asset misappropriation” means the act of possessing another person's property, or property co-owned with another, and dishonestly converting it for personal gain or for the benefit of a third party.
- (2) “Embezzlement” means the act of dishonestly deceiving a person by making false statements or concealing facts that should be disclosed. Through such deception, the offender obtains property from the deceived person or a third party, or causes them to execute, revoke, or destroy a legal document.
- (3) “Corruption” means the act of requesting, receiving, or agreeing to receive, as well as giving, offering or promising to provide, any property or benefit to a government official, government agency, private sector officer, or private entity, to influence the exercise of their authority to act, refrain from acting, expedite, or delay actions in a manner that is inconsistent with the law. Such actions result in unlawful benefits for oneself, a third party, or the preservation of business or other improper advantages.

In this light, various forms of corruption may include political contributions, charitable donations made to benefit one's business, business-related sponsorships that provide an unfair advantage, or other expenses that could serve as a means for individuals involved to engage in corrupt activities. These may include gifts, client entertainment expenses, that lead to the misuse of authority, such as bribing government officials, offering gifts or services, providing cash or cash equivalents, and colluding in bid-rigging.

“Bribery” means the act of offering, promising, or providing, as well as soliciting or accepting, any benefit related to items of value or other properties, whether directly or indirectly, to secure business or maintain improper advantages. This includes, but is not limited to, offering gifts or services, providing cash or cash equivalents, lending assets, or engaging in collusion in bidding and contract acceptance processes.

“Assets” means money, goods, gifts, or any other benefits that can be monetized. This includes special privileges not generally available to the public, such as discounts on products, exclusive services or entertainment, coverage of travel or vacation expenses, accommodation, meals, job placements, or similar advantages. These may be provided in the form of vouchers, tickets, or other proof of entitlement, as well as advance payments or reimbursements.

“Company” means ARIP Public Company Limited.

“Personnel” mean directors, executives, employees, and stakeholders of ARIP Public Company Limited.

2. Responsibilities

1. Board of Directors

1. Review and approve the Anti-Fraud and Corruption Prevention Policy.
2. Oversee the implementation of an effective system to support anti-fraud and corruption prevention.
3. Promote and foster a corporate culture of integrity and transparency in business operations.

2. Executives

1. Establish rules, regulations, and standards for employees to follow, including disciplinary penalties for violations.
2. Take actions to ensure the implementation of a system that promotes and supports the fight against and prevention of fraud and corruption, as well as periodically review the appropriateness of these measures.
3. Promote and communicate the policy to all employees and relevant parties to ensure understanding, awareness, and strict adherence.
4. Provide channels for reporting information or complaints, as well as implementing measures to protect whistleblowers.
5. Report the results of operations to the responsible committee.
6. Regularly review and adjust policies as necessary.

3) Compliance Department

Review, monitor, and consider compliance with the Anti-Fraud and Corruption Prevention Policy annually, and regularly report the results to the Company's board of directors.

4) Employees

Employees must understand and strictly follow the Anti-Fraud and Corruption Prevention Policy. They must not engage in any form of fraud or corruption, directly or indirectly, in any manner.

3. Political Policies and Guidelines

The Company has established political guidelines as follows:

1. Exercise personal rights as a good citizen in accordance with constitutional law and other related laws.
2. Do not participate in any activities or express any opinions that may create the impression that the Company is involved with or supports any political party or group, which may lead to discord and division within the Company and the nation.
3. Do not use the Company's assets to support any political party or group in exchange for or to obtain special privileges or wrongful benefits.

4. Policies and Guidelines on the Giving and Receiving of Gifts

1. Personnel shall avoid accepting gifts, whether monetary or non-monetary form, from business partners or from any individuals related to the business of the Company, except as a festivity or as a holiday tradition.
2. Personnel must not personally accept money, property, or any forms of benefits from customers, business partners or from any individuals in relation to their work on behalf of the Company.
3. Personnel must not lend or borrow money, or solicit money or assets, from the Company's customers or business partners, except for loans obtained from banks or financial institutions, in their capacity as a customer of those banks or financial institutions.
4. The giving or receiving donations or financial support must be transparent and comply with the law, ensure that such funds are not used as an excuse for giving or receiving bribes.
5. The Company does not have a policy to offer money, incentives, gifts or special benefits of any form to customers, business partners, external agencies (both public and private), or any individuals in order

to acquire a business deal, except for customary business, trade discounts and promotional projects of the Company.

5. Anti-Corruption Policies and Guidelines

1. Procurement must be conducted in accordance with established rules or procedures, ensuring fairness and transparency throughout the process. Consideration should be given to the reasonableness of price, quality, and after-sales service, as well as the standards that the vendor or service provider must meet. Additionally, officials must not engage in any activities or business transactions that could result in personal gain through their position in procurement, whether directly or indirectly, and must not use information obtained through procurement for personal or others' benefit.
2. Personnel must not engage in corruption or any actions that may lead to corruption in the procurement process of government agencies, whether directly or indirectly.
3. Directors, executives, employees, and individuals related to the Company are strictly prohibited from providing, requesting, offering, promising to offer bribes, including money, assets, or other benefits, or attempting to influence others to engage in any activities, whether directly or indirectly, that could result in an unfair advantage or other benefits in the procurement process, or contract performance, either before or during the bidding process, or after entering into the procurement contract, or to protect any inappropriate interests according to business ethics.
4. Directors, executives, employees, and stakeholders associated with the Company are prohibited from soliciting or engaging in corrupt practices for the benefit of the Company, themselves, or their families.
5. The Company has a strict policy of not paying facilitation fees in any form, whether directly or indirectly, and will not engage in or accept any actions in exchange for facilitating business operations.
6. Personnel must strictly adhere to the Company's Anti-Fraud and Corruption Prevention Policy.
7. Personnel must not ignore or disregard any transactions, actions, or behaviors that may be suspected of being related to corruption. Such personnel must report the issue to the Company and cooperate in investigating the facts.
8. Personnel must avoid any actions that present a conflict of interest. If any action or circumstance arises that may be seen as a conflict of interest with the Company, the personnel are required to report the conflict through the designated channels.
9. Employees must comply with the Company's Information Security Requirement Guidelines to prevent any corruption or fraud that may arise through online channels.

6. Dissemination of the Anti-Fraud and Corruption Prevention Policy

To ensure that all personnel are informed of the Company's Anti-Fraud and Corruption Prevention Policy, the Company will take the following actions:

1. The Anti-Fraud and Corruption Prevention Policy to be prominently displayed to ensure that everyone within the organization is aware.
2. The Anti-Fraud and Corruption Prevention Policy to be disseminated through various Company's channels, such as the Company website and annual reports.
3. The Anti-Fraud and Corruption Prevention Policy to be reviewed annually, or whenever there are significant changes that require updating.

7. Training

The Company provides orientation, training, meetings, or other appropriate activities (at least once a year) related to the Anti-Fraud and Corruption Prevention Policy, including relevant knowledge, to directors, executives, employees, and stakeholders on an ongoing basis.

8. Review

The Company ensures that the minimum standards of the anti-fraud and corruption prevention policies and guidelines, including those related to procurement, are reviewed at least annually.

9. Responsible Department for Anti-Fraud and Corruption Prevention

The Corporate Governance and Sustainability Committee.

10. Reporting Misconduct or Complaints Related to Corruption or Fraudulent Actions

The Company is determined to encourage its personnel to operate business in a correct, transparent and fair manner, in which their transactions can be audited, in accordance with good corporate governance and the business ethics of the Company.

The Company has established a policy for whistleblowing or reporting any misconduct or complaint, to ensure that supervisors and relevant departments are fulfilling their roles in overseeing, advising and monitoring the conduct of personnel to ensure compliance. Individuals can report any suspicious actions that may directly or indirectly cause fraud or corruption within the Company. The Company has mechanisms in place to protect whistleblowers as well as keeping every report confidential. Reports of misconduct or complaints can be made through the designated channels as follows:

1. Written letters to be sent to:
AVM Isaraya Sukcharoen (Independent Director and Chairman of the Audit Committee)
ARIP Public Company Limited
99/16-20 Ratchadapisek Road, Din,
Bangkok 10400
2. Emails to be sent to:

aripwhistleblow@arip.co.th

The complainant must specify details of the potential misconduct or complaint, together with the whistleblower's contact details for the Company's further proceedings.

The reported information from both channels will be directed to the Chairman of the Audit Committee.

The whistleblower will be protected, and the information will be kept confidential, with no impact on their job position during the investigation and after the process is completed.

11. Penalties

The Company has established penalties for those who fail to comply with the Anti-Fraud and Corruption Prevention Policy. The Company will consider disciplinary action based on the severity of the violation, the conduct history, and the intent of the offender. The Company may impose disciplinary measures in accordance with its regulations, without necessarily following a hierarchical approach. Additionally, the personnel may face legal penalties if their actions are found to be illegal.

Reviewed and approved according to the resolution of the Board of Directors No. 1/2025 dated 20 February 2025.

*- Manu Leopairote -
Mr. Manu Leopairote
(Chairman of the Board of Director)
ARIP Public Company Limited*