



## Anti-Corruption Policy

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Pinthong Industrial Park Public Company Limited

Revision No. 3 Approved on 24 February 2026 (BOD 2/2026)

## Anti-Corruption Policy

Pinthong Industrial Park Public Company Limited and its subsidiaries (the “Company”) are committed to conducting business with transparency, honesty, integrity, and ethical standards. The Company has therefore established this Anti-Corruption Policy to promote transparency in its operations, support efficient and sustainable business conduct, and foster confidence among customers, business partners, and all stakeholders.

The Company has prescribed the promotion and cultivation of an organizational culture that adheres to transparency, ethical conduct, and compliance with applicable laws, regulations, and relevant standards. The Company shall ensure that there are communications and training programs concerning the anti-corruption policy and practices, including the roles and responsibilities of responsible persons. In addition, the Company shall provide for regular monitoring and periodic review of compliance with this Anti-Corruption Policy to ensure alignment with changes in the business environment, rules, regulations, and applicable laws.

### 1. Objectives

1.1 To prescribe the conduct of corruption risk assessments and the establishment of appropriate internal control systems in order to prevent, detect, and mitigate risks arising from fraud and corruption.

1.2 To establish procedures for reporting, verification, investigation, and the taking of actions in relation to cases of fraud and corruption in a fair, transparent, and effective manner.

1.3 To ensure that the Company, its directors, executives, employees, staff, as well as any persons acting on behalf of the Company, strictly adhere to this Policy as a guideline for the performance of their duties.

1.4 To stipulate that any violation of this Policy shall be deemed a disciplinary offense and may result in disciplinary actions, including legal proceedings in accordance with applicable laws.

1.5 To promote the Company’s business operations to be conducted with transparency, accountability, and in compliance with the principles of good corporate governance, thereby leading to the Company’s sustainable growth.

## 2. Scope of Application

This Anti-Corruption Policy shall apply to the Company's directors, executives, and employees at all levels of the Company (which includes Pinthong Industrial Park Public Company Limited and its subsidiaries), as well as all stakeholders.

## 3. Definitions

**“Corruption”** means the abuse of entrusted power, whether in the public or private sector, for personal gain, including bribery, and any conduct of a person entrusted with duties and responsibilities who acts in violation of or contrary to such duties in a manner inappropriate to his or her position or status, whether as a public official, an officer of a private entity, an agent, or in any other capacity or relationship, with the intent to obtain any undue benefit for himself/herself or others.

**“Bribery”** means any property or other benefit offered, promised, given, accepted, provided, or requested, which may influence a decision in a manner that induces a person to act or refrain from acting in violation of his or her duties or responsibilities.

**“Gift”** means any item of monetary value, including property, cash equivalents, or anything that can be exchanged for goods or services.

**“Gift Giving”** means the giving of gifts, souvenirs, or any other property in accordance with customary practices, traditions, or local customs, and shall include occasions of congratulations, expressions of appreciation, condolences, or any gesture demonstrating goodwill and amicable relations.

**“Hospitality”** means expenses incurred for business entertainment, including but not limited to meals and beverages, sports and recreational activities, and other expenditures directly related to business operations or customary business practices.

**“Donation”** means money or assets contributed by the Company for public benefit without any expectation of return or benefit that may be considered as corruption.

**“Political Contribution”** means any form of support provided to a political party, whether in the form of money, assets, gifts, hospitality, donations, or any other support that

can be valued in monetary terms, as well as indirect support such as political advertising or participation in political activities, for the purpose of obtaining a business advantage.

**“Facilitation Payment”** means a small amount of unofficial payment made to a public official solely to ensure that such public official performs a routine governmental action or to expedite the performance of such action, where such action does not involve the exercise of discretion by the public official.

**“Kickback”** means a sum of money negotiated to be deducted from a payment for goods or services and returned to the bribe recipient.

**“Conflict of Interest”** means any act in which a person, whether an employee of the Company, a politician, a government official, or a service recipient, has a personal interest to such an extent that it affects or may affect the decision-making or the performance of duties in his or her position of responsibility, thereby impacting the interests of the public.

**“Public Official”** means a person holding a political position, a government official, or a local government officer with a position or regular salary, including employees or persons working in state enterprises or government agencies, local administrators and members of local councils who are not political office holders, officials under laws governing local administration, and shall include directors, sub-committee members, employees of government agencies, state enterprises, or other government entities, as well as any individual or group of persons who exercise or are entrusted to exercise administrative authority of the State in carrying out any act under the law, whether established under the government sector, state enterprises, or other state undertakings.

**“Foreign Public Official”** means any person holding a legislative, executive, administrative, or judicial office of a foreign state, and any person performing public functions for or on behalf of a foreign state, including for a government agency or state enterprise, whether appointed or elected, whether permanent or temporary, and whether or not receiving a salary or other remuneration.

**“Official of an International Organization”** means any person working for an international organization or any person authorized by such international organization to act on its behalf.

**“Business Partner”** means any person or juristic person having a business relationship with the Company, whether directly or indirectly, including but not limited to suppliers, service providers, contractors, subcontractors, agents, brokers, consultants, business representatives, as well as any other persons or entities acting on behalf of or for the benefit of the Company.

**“Employee”** means any person who works for the Company under its direction, supervision, and control, whether as a permanent employee, temporary employee, contractual employee, or any other person receiving remuneration from the Company, regardless of how such person is appointed or designated.

**“Stakeholder”** means any person, group of persons, or entity that has influence over the Company’s decision-making processes and may affect the Company’s objectives and success. It shall also include persons who are affected by the Company’s decisions and those who have an interest in the Company’s business operations.

**“Agent”** means any person or juristic person appointed, assigned, or authorized to act on behalf of the Company in contacting, negotiating, promoting sales, distributing products, providing services, or conducting any business activities in the name of, or for the benefit of, the Company, whether directly or indirectly, and shall include any sub-agent so authorized.

**“The Company”** means Pinthong Industrial Park Public Company Limited and its subsidiaries.

**“Affiliate”** means any company having a relationship with the Company in any of the following manners:

- a company in which the Company holds, whether directly or indirectly, more than fifty percent (50%) of the total issued shares;
- a company which is under common control with the Company; or

- a company whose controlling person is the same person as the controlling person of the Company.

#### **4. Roles, Duties, and Responsibilities**

- 4.1 The Board of Directors shall establish the Anti-Corruption Policy covering all forms of corruption, whether direct or indirect, and shall oversee that appropriate systems, mechanisms, and resources are in place to effectively support the prevention of and combat against corruption throughout the organization.
- 4.2 The Audit Committee shall have the roles, duties, and responsibilities to review the financial reporting and accounting systems, internal control systems, and other processes relating to anti-corruption measures to ensure that the operations of various units are efficient, lawful, in compliance with applicable rules and procedures, and aligned with international standards and good ethical practices.
- 4.3 The Corporate Governance and Sustainability Committee shall be responsible for overseeing and establishing the operational framework to ensure that appropriate anti-corruption measures are in place in accordance with the business context, promoting awareness and compliance at all levels, including appointing relevant working teams and reporting the results to the Board of Directors.
- 4.4 The Risk Management Committee shall be responsible for regularly assessing and monitoring corruption risks in the Company's key processes, prescribing risk management measures, and reporting the results to the Board of Directors.
- 4.5 Internal Auditor shall be responsible for auditing and reviewing operations to ensure compliance with this Policy, applicable laws, and relevant requirements, in order to ensure that the internal control systems are appropriate and adequate, including conducting audits in relation to fraud and corruption cases concerning the organization in addition to the prescribed internal audit plan, and reporting the results to the Audit Committee.
- 4.6 Chief Executive Officer (CEO) shall be responsible for communicating, promoting, and monitoring compliance with the Anti-Corruption Policy throughout the organization, cooperating in the investigation of complaints, and appointing working committees to consider and investigate relevant cases when necessary.
- 4.7 The Anti-Corruption Working Team shall be responsible for carrying out duties as assigned and implementing anti-corruption measures, including participating in the

Thai Private Sector Collective Action Against Corruption (CAC) and reporting performance results to the Corporate Governance and Sustainability Committee.

4.8 Executives shall be responsible for implementing this Policy, communicating and promoting awareness and understanding among employees at all levels as well as all relevant parties to ensure that duties are performed free from corruption, and encouraging and supporting the Company in adopting this Anti-Corruption Policy and measures as appropriate. Executives shall also implement the recommendations and guidance of the Board of Directors and/or sub-committees, including reviewing the appropriateness of systems and measures, and reporting any issues identified to the Board of Directors and/or relevant sub-committees in accordance with their roles and responsibilities.

## **5. Practices in Accordance with the Anti-Corruption Policy**

5.1 The Company requires that its directors, executives, and employees at all levels strictly comply with the Anti-Corruption Policy and shall not engage in or be involved in any form of corruption, whether directly or indirectly, including the giving or receiving of money, assets, items, gifts, hospitality, donations, political contributions, or any other benefits, for the purpose of obtaining improper benefits from any person conducting business with the Company.

5.2 The Company requires that all departments establish anti-corruption measures in alignment with this Anti-Corruption Policy and related guidelines, as well as applicable laws. The Company shall ensure that systems and measures are regularly reviewed, revised, and improved to be consistent with changes in the business environment, including conducting periodic corruption risk assessments in order to determine appropriate preventive and corrective measures.

5.3 Directors, executives, and employees of the Company shall not ignore or overlook any acts that may constitute corruption in relation to the Company, and shall report such acts to their supervisors or relevant persons. In case of any doubts or inquiries regarding the Anti-Corruption Policy, they shall seek advice from their supervisors or relevant persons.

5.4 The Company shall establish channels for whistleblowing or reporting any acts that may constitute corruption in relation to the Company, from both internal employees and external parties. The Company shall ensure fairness and protection of the rights of whistleblowers and/or employees who refuse to participate in, and/or report, corruption related to the Company, including protection against any adverse impact on their employment, disciplinary actions, or any other actions that may result in detrimental effects to such employees.

5.5 The Company has a policy not to impose any penalties, demotion, or any adverse consequences on personnel who refuse to give bribes or engage in acts that may constitute corruption, even if such refusal may result in the loss of business opportunities for the Company.

5.6 The Company shall ensure continuous communication of the Anti-Corruption Policy through various communication channels of the Company, such as electronic mail, the Company's website, and notice boards, and shall provide training to directors, executives, and employees at all levels in order to promote knowledge, understanding, and proper practices.

5.7 The Company places importance on disseminating and promoting knowledge and understanding of anti-corruption practices to other persons who are required to perform duties in connection with the Company, such as business partners, stakeholders, and agents, in order to foster a strong ethical culture.

5.8 to establish good business practices, the Company has adopted a policy of no gift acceptance during the New Year festive season and on other occasions. The Company also has a policy of not making facilitation payments in any form, whether directly or indirectly, in exchange for business facilitation.

In order to ensure clarity in the implementation of the Anti-Corruption Policy and to prevent risks that may give rise to corruption, the Company's directors, executives, and employees shall exercise due care in the following matters:

## 6. Gift Giving Guidelines

Directors, executives, and employees may give gifts, souvenirs, or other benefits to stakeholders, provided that the following conditions are met:

- 6.1 Such giving is in accordance with socially accepted customs and traditions and does not violate any applicable laws. For Thailand, the value of the gift must not exceed THB 3,000 per person per occasion, in accordance with the notification of the National Anti-Corruption Commission (NACC).
- 6.2 The gift must not be in the form of cash or cash equivalents, such as vouchers or gift cards.
- 6.3 The gift or souvenir shall be items that promote the Company's image, such as calendars, diaries, notebooks, the Company's products, corporate promotional materials, products from royal initiative projects, community products, charitable or public benefit products, or products that support sustainable development.
- 6.4 Gifts shall be given strictly in the name of the Company and not in the name of any director, executive, or employee of the Company.
- 6.5 Gifts shall be appropriate in context, reasonable in value, and suitable for the occasion, such as gifts given at project launch events or company anniversary celebrations. In the case of an ongoing bidding or procurement process, gift giving to public officials or relevant authorities shall be strictly prohibited.
- 6.6 Gifts shall not be given with any improper intent or as a means to influence, induce, or reward any person to act or refrain from acting in a manner that is inappropriate, or to obtain any undue advantage or benefit.
- 6.7 Gifts, souvenirs, assets, or any other benefits shall not be given to spouses, children, or related persons of public officials, customers, business partners, or any persons with whom the Company has dealings, as such actions may be deemed as indirect receipt.
- 6.8 Any gift giving shall be subject to proper disbursement approval and must be approved by the authorized approver of the Company.

## 7. Gift Acceptance Guidelines

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The Company has established a policy of no gift acceptance during the New Year festive season and on other occasions in order to promote good business practices. Directors, executives, and employees of the Company shall communicate such no-gift policy to business partners, stakeholders, and agents, and shall request their continued cooperation in complying with this policy.

7.1 Directors, executives, and employees of the Company shall refrain from accepting any gifts or other benefits from business partners, stakeholders, agents, or any persons related to the Company's business.

7.2 In cases where it is necessary to accept any gifts or other benefits unavoidably, such as where business partners, stakeholders, agents, or persons related to the Company's business are unaware of the Company's no-gift policy and present such items, or where directors, executives, or employees are in a situation where refusal is not practicable in order to maintain good relationships with such persons or organizations, the following procedures shall be observed:

- A department manager or above shall act as the representative in receiving such items;
- Upon receipt, the recipient shall submit the items together with a gift/benefit report form to his or her respective department without delay;
- The Company shall maintain a record of all gifts or other benefits received and shall be responsible for collecting such items for donation to external persons or organizations for charitable or public benefit purposes. In the case of consumable items with an expiration period of within one (1) month, such items shall be distributed to directors, executives, and employees as appropriate.

7.3 Directors, executives, and employees are permitted to accept souvenirs of nominal value not exceeding THB 500, such as calendars, keychains, pens, notebooks, or souvenirs bearing the organization's logo. A department/division manager or above shall act as the representative in receiving such items. The recipient shall submit the items together with a gift/benefit report form to his or her respective department for

recording and for consideration of appropriate allocation or distribution to directors, executives, and employees.

7.4 In cases where the Company receives awards, souvenirs, or any items from competitions or recognitions, such as entering into agreements with business partners, receiving awards or recognitions for the Company's performance, or awards from contests or campaigns (including no-gift campaigns during the New Year festive season), the Company may accept such items in the name of the organization. A department manager or above shall be assigned as the representative to receive such items, and such items shall be deemed the property of the Company.

## **8. Hospitality Guidelines**

Directors, executives, and employees of the Company may provide hospitality to business partners, external stakeholders, agents, or persons related to the Company's business, provided that the following conditions are met:

8.1 Such hospitality shall be directly related to the Company's business operations, such as meals and beverages or hospitality in the form of sports or recreational activities.

8.2 Such hospitality shall be provided strictly in the name of the Company and not in the name of any director, executive, or employee of the Company.

8.3 Hospitality shall be of appropriate and reasonable value, directly related to normal business practices in accordance with customary practices or trade customs, and shall not affect decision-making in the performance of duties or give rise to any conflict of interest. Such hospitality must not constitute the giving or receiving of improper benefits or be intended to influence or induce any unfair decision. The Company shall prohibit hospitality and the provision of entertainment to public officials, regulatory authorities, or persons involved in decision-making processes in cases where the Company is in the process of applying for permits, submitting proposals, engaging in procurement, or undertaking any activities that may give rise to corruption risks.

8.4 Hospitality shall not be provided at inappropriate venues.

8.5 Hospitality shall not be provided with any improper intent or as a means to influence, induce, or reward any person to act or refrain from acting in a manner that is inappropriate, or to obtain any undue advantage or benefit.

8.6 Any hospitality shall be subject to proper disbursement approval and must be approved by the authorized approver of the Company.

## **9. Donation Guidelines**

Directors, executives, and employees of the Company shall exercise due care in the following matters:

9.1 Any use of the Company's funds or assets for donations shall be made strictly in the name of the Company.

9.2 Donations shall be made to foundations, charitable organizations, temples, hospitals, schools, universities, medical institutions, or organizations for public benefit.

9.3 Donations shall be conducted in a transparent and lawful manner, and it must be ensured that such donations are not used as a pretext for giving or receiving bribes.

9.4 With respect to donation approval, the responsible department shall receive requests for donations and verify relevant documentation from foundations, charitable organizations, and government agencies. Upon approval by the authorized approver of the Company, the relevant department shall proceed with the delivery of assets to the recipient. Such delivery shall be documented, including photographic evidence.

9.5 In the event that any employee or group of persons is found to have acted dishonestly in donating cash, assets, goods, or materials, or if any donation is found to be indicative of corruption and causes damage to the Company, such employee(s) or group shall be held fully liable for the damages incurred and shall be subject to disciplinary consideration and severe disciplinary actions in accordance with the Company's regulations.

## **10. Sponsorship Guidelines**

Directors, executives, and employees of the Company shall exercise due care in the following matters:

- 10.1 Any sponsorship shall be ensured not to be used as a pretext for giving or receiving bribes.
- 10.2 Directors, executives, and employees of the Company shall not act as intermediaries in offering money, assets, items, or any other benefits to persons related to the Company's business, including government agencies, in exchange for undue privileges or to induce public officials to refrain from complying with applicable rules, regulations, and laws.
- 10.3 Any dealings with government agencies shall be conducted in a transparent manner and in compliance with applicable laws. The giving or receiving of bribes in any form of business operations is strictly prohibited.
- 10.4 Sponsorship shall be verifiable, ensuring that the recipient has actually carried out activities under the relevant project and that such sponsorship is made to support the achievement of the project's objectives, for business promotion, brand publicity of the Company, or genuinely in accordance with corporate social responsibility objectives.
- 10.5 The use of the Company's funds or assets for sponsorship shall be made strictly in the name of the Company. Sponsorship must have a clear business purpose and shall enhance the Company's image and reputation. Disbursement must clearly specify the objectives, be supported by verifiable evidence, and comply with the Company's procedures.
- 10.6 Any sponsorship shall be subject to proper disbursement approval and must be approved by the authorized approver of the Company.

## **11. Political Contribution Guidelines**

The Company recognizes the importance of political participation as part of its role as a socially responsible organization. However, the Company is committed to conducting its business with transparency and fairness and has therefore established clear guidelines to

prevent any acts that may constitute improper political contributions which could lead to corruption, as follows:

11.1 No donation of money or any assets shall be made to any political party. Financial support to any political party, whether in the form of direct contributions or through foundations or any related organizations, is prohibited.

11.2 Use of the Company's resources for political purposes is prohibited. Employees and executives shall not use the Company's resources, such as working time, vehicles, or office equipment, to support any political activities of any political party.

11.3 No special privileges shall be granted to political parties or party members, such as special discounts, free services, or access to confidential information.

11.4 The Company encourages employees to participate in political activities in their personal capacity, using their own time and personal resources.

## **12. Facilitation Payment and Kickback Guidelines**

The Company has no policy of making facilitation payments or kickbacks to public officials, customers, vendors, or other business partners, in any form, whether directly or indirectly.

## **13. Procurement Guidelines**

Procurement shall be conducted in accordance with the Company's regulations and shall be carried out in a transparent and auditable manner, in compliance with applicable laws, without any concealed or improper benefits. The engagement of third parties to liaise with public officials or government agencies must not be used as a means to channel or conceal bribery through such third parties.

## **14. Human Resources Management Guidelines**

The Company recognizes the importance of human resources management as a key mechanism in fostering an organizational culture grounded in integrity, transparency, and the prevention of bribery and corruption in all forms. The Company therefore ensures that the Anti-Corruption Policy is integrated into all human resources processes in order to ensure

that the Company's operations are in accordance with good corporate governance principles and ethical business standards.

#### 14.1 Recruitment and Selection

The Company shall conduct recruitment and selection based on suitability, knowledge, capability, and ethical standards as key considerations. The background and qualifications of candidates shall be assessed in a manner appropriate to the position, and any selection that may give rise to conflicts of interest, interference, or undue favoritism shall be avoided. The Company shall promote awareness among selected personnel to strictly adhere to the Company's Anti-Corruption Policy.

#### 14.2 Performance Evaluation

The Company shall establish a performance evaluation system that is fair, transparent, and auditable. Such evaluation shall cover both work performance outcomes and conduct in compliance with ethical standards, the Anti-Corruption Policy, and the Company's requirements. Any act that constitutes a violation of the anti-bribery policy or creates corruption risk shall be taken into account as a factor in performance evaluation.

#### 14.3 Compensation and Promotion

The Company shall determine compensation, remuneration adjustments, and promotions based on performance, capability, responsibility, and adherence to ethical standards and the Anti-Corruption Policy. The Company shall not grant rewards or any form of compensation to employees who violate the anti-bribery policy or are involved in corruption, and shall take appropriate disciplinary actions in accordance with the Company's regulations.

### **15. Acts Constituting Violations of the Anti-Corruption Policy**

All employees are required to comply with the Anti-Corruption Policy. The following acts shall constitute violations:

#### 15.1 Failure to comply with the Anti-Corruption Policy.

15.2 Advising, encouraging, or supporting others to not comply with the Anti-Corruption Policy.

15.3 Ignoring or failing to report any violation or non-compliance with the Anti-Corruption Policy where the person knows or should have known of such violation in connection with duties under his or her responsibility.

15.4 Failure to cooperate with, or obstruction of, any inquiry, investigation, or fact-finding process relating to alleged violations or non-compliance with the Anti-Corruption Policy.

15.5 Any unfair treatment against any person as a result of such person reporting non-compliance with the Anti-Corruption Policy.

Directors, executives, and employees of the Company who neglect, omit, or intentionally fail to comply with the Anti-Corruption Policy shall be deemed to have committed a serious disciplinary offense and shall be subject to disciplinary actions in accordance with the Company's rules and regulations. In the event that such violation constitutes an unlawful act, the Company shall consider taking legal action in accordance with applicable laws.

## **16. Complaint and Whistleblowing Channels**

The Company provides channels for whistleblowing to enable employees and relevant parties to report any misconduct or suspected acts of corruption. In submitting a report, the whistleblower should provide details of the incident, including relevant information such as date, time, location, persons involved, and any supporting documents or evidence (if any), through the Company's channels as follows:

16.1 Whistleblowing or complaints may be submitted in writing to:

Company Secretary

Pinthong Industrial Park Public Company Limited

789 Moo 1, Nong Kho – Laem Chabang Road, Nong Kham Subdistrict,

Si Racha District, Chon Buri 20230

16.2 Persons authorized to receive whistleblowing reports or complaints:

Supervisors, the Company Secretary, the Secretary to the Audit Committee, or any member of the Board of Directors

16.3 E-Mail Address : [Hotline@pinthongindustrial.com](mailto:Hotline@pinthongindustrial.com)

16.4 Online submission via the Company’s website:

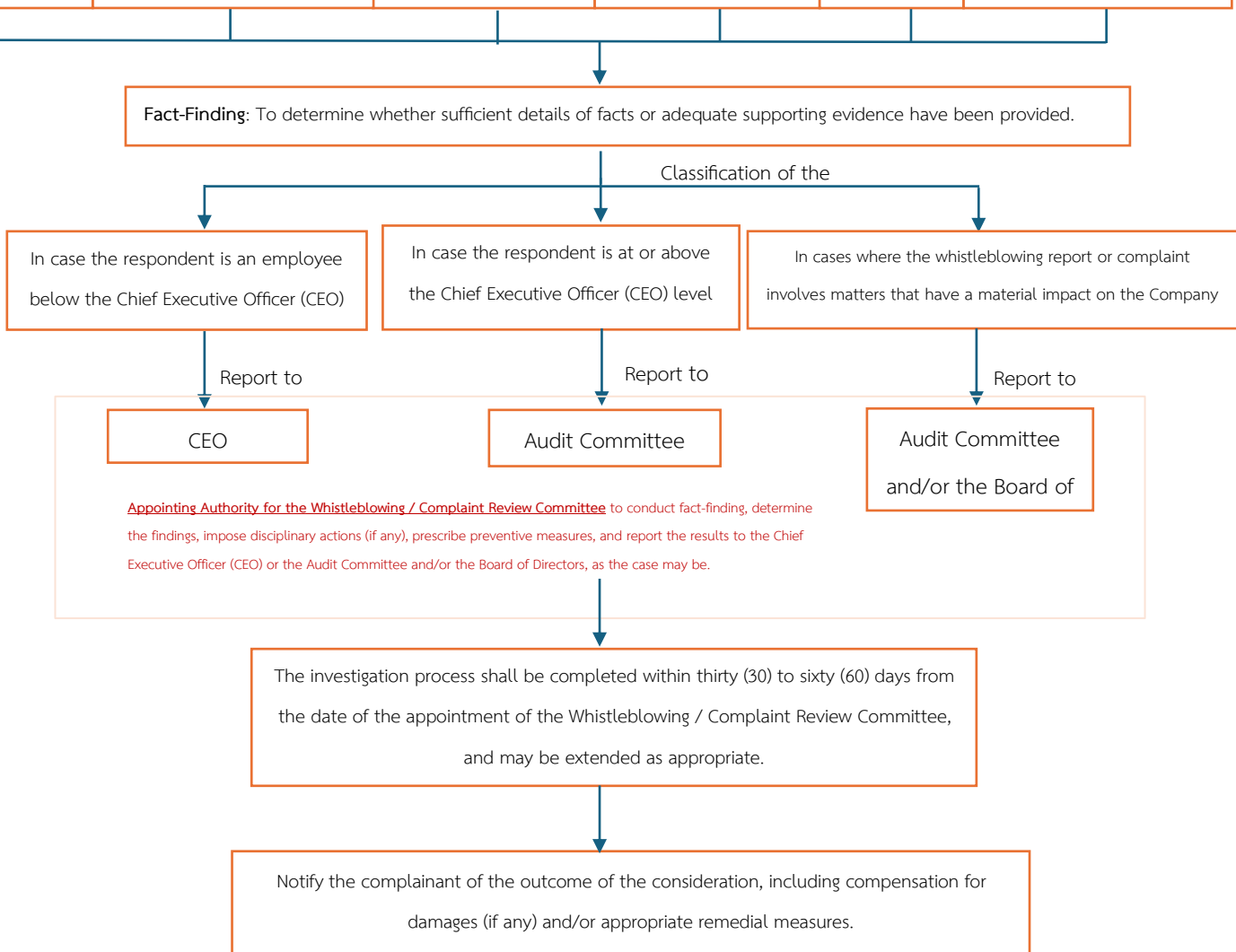
<https://investor.pinthongindustrial.com/th/governance/whistleblowing-form>

16.5 Company telephone: Tel. 038-296334 Ext. 202

16.6 Whistleblowing or complaint drop box within the Company premises

**Whistleblowing / Complaint Channels**

<b>By post addressed to:</b> - Company Secretary - Secretary to the Audit Committee	<b>Persons Authorized to Receive Whistleblowing Reports / Complaints:</b> - Any trusted supervisor at any level - Company Secretary	<b>Email:</b> <a href="mailto:hotline@pinthongindustrial.com">hotline@pinthongindustrial.com</a>	<b>Website:</b> Online Submission Form <a href="http://www.pinthongindustrial.com">www.pinthongindustrial.com</a>	<b>Tel:</b> 038-296334 Ext 202	<b>Whistleblowing / Complaint Drop Box (Red Box):</b> Located within the Company’s premises and in front of the Utilities Building at Pinthong Industrial Estate Projects 1-6
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## 17. Review and Revision of the Anti-Corruption Policy

The Company designates the Company Secretary Department as the responsible unit, working in coordination with the Corporate Governance and Sustainability function, the Audit Committee, and the Risk Management Committee. The Company shall ensure that this Policy is reviewed on a regular basis or upon any significant changes, in order to ensure that it remains appropriate, up to date, and aligned with the Company's business operations, applicable laws, and relevant requirements.

This Anti-Corruption Policy Revision No. 3 shall be effective from 24 February 2026, by the approval of the Board of Directors' Meeting No. 2/2026.

- Mr. Prasan Tanprasert -  
Chairman of the Board of Directors  
Pinthong Industrial Park Public Company Limited