

BOD No. 002/2025

**Anti-Corruption Policy**  
**S P V I Public Company Limited**

S P V I Public Company Limited (the “Company”) is committed to conducting its business with honesty, transparency, fairness, and responsibility toward all stakeholder groups in accordance with the principles of good corporate governance. The Company is firmly committed to preventing and combating corruption, recognizing that bribery and corruption are serious threats that undermine free and fair competition and adversely affect economic and social development.

Accordingly, the Company has established this Anti-Corruption Policy in writing to provide clear guidelines for directors, executives, and employees to strictly adhere to in conducting the Company's business.

**Definitions**

“**Corruption**” means bribery, including the offering, giving, soliciting, or accepting of bribes, assets, money, or any other undue benefit to or from government officials, government agencies, private-sector entities, or any person entrusted with duties or authority, whether directly or indirectly, in order to induce such person or entity to refrain from performing their duties or to misuse their authority for the purpose of obtaining improper business benefits or personal gain.

**Objectives**

1. To establish rules and guidelines to prevent the Company and its employees from engaging in any improper conduct or actions that are inconsistent with good governance practices.
2. To promote the role and participation of directors, executives, and employees in preventing and combating corruption in connection with the Company's business operations.
3. To foster confidence among stakeholders that the Company conducts its business with integrity and honesty.

**Scope and Guidelines**

1. **Directors, executives, and employees shall exercise caution with respect to the following forms of corruption:**

**1.1 Gifts and Hospitality**

- (1) The Company recognizes that maintaining good relationships with business partners is important to its continued success.
- (2) Directors, executives, and employees may give or receive gifts and hospitality on customary occasions, in accordance with traditions, cultural practices, or generally accepted social

etiquette, provided that such giving or receiving does not influence business decisions. Any such giving or receiving must be conducted transparently and be capable of disclosure.

- (3) Gifts that may be accepted shall not be in the form of cash or cash equivalents.
- (4) The Company does not prohibit the preparation of gifts bearing the Company's logo, provided that giving such gifts to any person or organization is reasonable and consistent with the Company's business operations.
- (5) Directors, executives, and employees shall not request or accept gifts from customers, business partners, or persons connected with the Company's business in any circumstances where such gifts may influence decision-making, create bias, place the recipient under obligation, or result in a conflict of interest.

### **1.2 Political Support**

- (1) The Company supports directors, executives, and employees in exercising their lawful political rights as good citizens. Individuals are free to participate in political activities in accordance with the Constitution and other applicable laws, provided that such participation takes place outside working hours and uses only their own resources.
- (2) The Company has a policy of not providing support or assistance, whether directly or indirectly, to political parties, political groups, or politicians.

### **1.3 Business Relations and Procurement with Government Agencies**

- (1) The Company does not support the giving or receiving of bribes in any form of business activity. The Company's operations and interactions with government agencies shall be conducted with transparency and integrity and in compliance with applicable laws and regulations.
- (2) Directors, executives, and employees must not ignore or overlook any conduct that they genuinely suspect, or observe, may constitute corruption in connection with the Company, regardless of whether they are personally affected. Such matters must be reported to a supervisor or responsible person, and employees shall cooperate in any investigation and fact-finding process.
- (3) The Company shall ensure fairness and protection for employees who refuse to participate in corruption or who report corruption-related matters. Accordingly, the Company has established measures to protect whistleblowers, complainants, and persons who cooperate in reporting corruption under this Policy.

## **2. Whistleblower and Complainant Protection Measures**

- (1) The Company shall maintain the confidentiality of information and the identities of whistleblowers, complainants, and persons who are the subject of a complaint. Information shall

be disclosed only to the extent necessary, taking into consideration the safety of, and potential harm to, the reporting person, the source of information, and related parties.

- (2) Any person who suffers damage shall receive appropriate and fair remedial measures through suitable procedures. The Company shall not take any unfair action against whistleblowers, complainants, or persons who cooperate in fact-finding investigations, including changes in position, job responsibilities, workplace location, suspension, termination of employment, or any other form of unfair treatment.

### 3. Whistleblowing and Complaint Channels

Reports of misconduct, whistleblowing matters, or complaints may be submitted through the following channels:

- (1) Company Secretary

S P V I Public Company Limited

2 Premier Place Building, 1st Floor Zone A, 3rd Floor Zone A and Zone B

Soi Premier 2, Srinakarin Road

Nong Bon, Prawet, Bangkok 10250

Email: [companysecretary@spvi.co.th](mailto:companysecretary@spvi.co.th)

- (2) Internal Audit Department

S P V I Public Company Limited

2 Premier Place Building, 1st Floor Zone A, 3rd Floor Zone A and Zone B

Soi Premier 2, Srinakarin Road

Nong Bon, Prawet, Bangkok 10250

Email: [spviwhistleblowing@spvi.co.th](mailto:spviwhistleblowing@spvi.co.th)

This Policy shall become effective on 13 February 2025.

- Signature -

(Mr. Teera Aphaiwongse)

Chairman of the Board of Directors

S P V I Public Company Limited