BOD No. 018/2025

Tax Policy

S P V I Public Company Limited

S P V I Public Company Limited ("the Company") recognizes its role and responsibility as a responsible taxpayer, which constitutes an important contribution to national development and long-term economic sustainability. The Company is committed to conducting its business in accordance with the principles of good corporate governance, transparency, accountability, and consideration of the expectations of all stakeholder groups.

Accordingly, the Company has established tax policies and practices covering both direct and indirect taxes based on the principles of accuracy, transparency, fairness, and strict compliance with applicable laws and regulations. In addition, the Company has integrated tax considerations into its corporate governance framework and business strategies in order to enhance stakeholder confidence. The Company has also established tax risk management procedures to mitigate potential tax risks and maintain the Company's credibility and reputation over the long term.

The Company has established the following tax policies and practices in key areas:

1. Tax Ethics

1.1 The Company shall comply with tax laws and related requirements accurately, completely, and within the prescribed legal timeframes, including the preparation of reports and submission of tax returns in accordance with its obligations as a taxpayer.

1.2 The Company shall utilize tax incentives and benefits available under applicable laws in an appropriate and transparent manner based on genuine business activities, without contravening legal principles or engaging in improper tax avoidance practices.

1.3 The Company shall not establish tax structures or enter into transactions intended primarily to obtain tax benefits that are inconsistent with business substance or contrary to tax ethics.

1.4 The Company supports the use of the tax system as a mechanism to enhance competitiveness and create economic value for stakeholders.

2. Tax Risk Management

2.1 Risk Monitoring and Assessment

The Company shall regularly monitor, analyze, and assess tax risks in order to prevent errors and non-compliance with applicable tax laws and regulations.

2.2 Impact Assessment and Corrective Measures

The Company shall assess the potential impact of tax risks on its reputation and credibility and shall establish corrective measures when errors or legal uncertainties are identified. The results of such actions shall be reported to management on a regular basis.

2.3 Continuous Improvement of Tax Risk Management Processes

The Company shall regularly review and improve its tax risk management processes to align with changes in relevant laws, regulations, standards, and the Company's business structure.

2.4 Transfer Pricing

For transactions conducted between affiliated companies or related parties, the Company shall determine prices and conditions in accordance with market-based principles as if such transactions were conducted between independent parties (the Arm's Length Principle), and in compliance with international practices as well as applicable Revenue Department laws and regulations, in order to reduce the risk of transfer pricing adjustments and additional tax assessments.

3. Tax Transparency

3.1 Transparency in Tax Management

The Company is committed to managing tax matters transparently by disclosing information as required by law in a complete and timely manner and maintaining accurate tax documentation that is readily available for inspection by government authorities. This is intended to ensure compliance with the spirit of the law and reinforce confidence in an effective tax system.

3.2 Transparency Toward Stakeholders

The Company places importance on communicating tax-related information relevant to stakeholders in an appropriate, clear, and ongoing manner in order to enhance understanding of the Company's role in supporting the broader economy and to demonstrate its commitment to social responsibility through fair and accountable business practices.

4. Roles, Duties, and Responsibilities

To ensure the effective implementation of this Tax Policy, the Company shall establish clear roles, duties, and responsibilities for relevant personnel and functions in relation to tax management, accounting, tax filing, tax payment, and the maintenance of complete and accurate supporting documentation.

This Policy shall become effective on 24 December 2025 upon approval by the Managing Director.

Announced on 24 December 2025.

- Signature -

(Mr. Trisorn Volyarngosol)

Managing Director

S P V I Public Company Limited