



Dynasty Ceramic Public Company Limited and its Affiliates

Anti-Corruption Policy

The ideology of Dynasty Ceramics Public Company Limited and its affiliates in carrying out business operations is to deploy a competitive strategy of fairness, transparency, adherence to the good quality of the products as a material substance and strictly comply with the applicable laws as well as adhering to the corporate social responsibility (CSR) and all groups of stakeholders in accordance with good corporate governance and the Code of Conduct of Dynasty Group. The Company is therefore committed to implementing the anti-corruption in all forms, while requiring it and its affiliates including those involved in the business operations to execute in compliance with such anti-corruption policy that suggests all related organizations to thoroughly comply with, as well.

To ensure that Dynasty Group has a policy setting out the responsibilities, practical guidelines and appropriate operating requirements to prevent corruption practices in all activities and in order to make the decisions and business operations which may be at risk of corruptions able to be considered and treated carefully and prudentially, the “Anti-Corruption Policy” has therefore been prepared in writing for use as clear guidelines in performing duties and the development towards being a sustainable organization.

Definition according to the Anti-Corruption Policy:

“Company” means Dynasty Ceramic Public Company Limited and its affiliates.

“Affiliate” means Tile Top Industry Public Company Limited , Royal Ceramic Industry Public Company Limited including any company in which the Company continues to hold shares of more than 50 percent of the registered capital after this Policy has come into force.

“Corruption” means a bribery in any form by offering to give, making a promise, giving, giving an assurance on, demanding or accepting money, property or any other benefits which are considered the improper practice and a violation of the Laws, Rules, Regulations or an act performed for personal benefit or benefit of the other persons, whether directly or indirectly, unless otherwise it is in the case that such a Law, Regulation, Notification, Rule, local custom or commercial tradition has permitted in so doing. The corruption shall include a giving or an accepting of a bribery from government officials, government agencies, NGOs or any other persons dealing business with the Company in order to persuade such person to perform or omit to perform their duties or abuse their powers in all forms including exploiting unlawful business benefits for own self or other persons, both within and outside the organization.

Anti-Corruption Policy:

1. To instill consciousness in and making communication to everyone within the organization to be aware of their responsibilities and comply with the Anti-Corruption Policy, including the disclosures of the information on the anti-corruption measures to the general public.

2. The compliances with this Anti-Corruption Policy shall regularly be reviewed so shall as the practical guidelines and the operational requirements to be compatible with the changes in in business, Rules, Regulations and Laws.

Responsibility:

1. The Company Board of Directors has the duties and responsibilities for formulating a policy and monitoring controls to ensure that there is a system to effectively support the anti-corruption system as well as instilling the system in everyone to extent of making it a corporate culture.
2. The Audit Committee has the duties and responsibilities for reviewing financial and accounting reporting system, internal control system and risk management system to ensure that they meet the specified standard, are concise, appropriate and efficient.
3. Managing Director, the management team and management personnel have the duties and responsibilities for formulating and reviewing the systems to ensure that there is a system and a provision to provide the anti-corruption policy promotion and support actions in order to communicate the same to employees and all parties involved.

Practical guidelines:

1. Directors, management personnel and employees of all levels in the organization must adopt for practical executions the anti-corruption policy to set a good example as well as admiring and extolling good and honest people by upholding these attributes as the values of the organization.
2. Employees of all levels in the organization must not fail or neglect to act on when coming across an action considered to be in a manner of a corruption by giving a notification accordingly to their Supervisors or a person in charge. They must contributively play their roles in tracking and checking on the corruption practices and misconducts in the organization.
3. Dynasty Group will provide fairness and protections to employees who refuse or report the corruption that they will not be demoted or punished even such doing will cause the Company to lose business opportunities.
4. The Company will promote, support, motivate, supervise, provide training, develop potentials for employees in the departments as well as disseminating information on the prevention of and anti-corruption, on a regular basis.
5. Accepting things or any other benefits:
 - (1) The Company has prescribed that there shall be the Notifications/Announcements on the Non-Acceptance of Gift Policy during the traditional festivals: such as; New Year's Celebration or any other occasions to create a good norm in carrying out the business by communicating to directors, management personnel, employees and business partners of the Company.
 - (2) Employees have the duties to inform the business partners and relevant stakeholders to be aware of the Notifications/Announcements on the Non-Acceptance of Gift Policy of the Company periodically and ask the stakeholders to cooperate with the Company on the aforementioned actions.
 - (3) In the case of a necessity to receive things or any other benefits which are unavoidable: for example; partners are not aware of the Notifications/Announcements on the Non-Acceptance of Gift Policy and eventually bring such things for delivery as a gift or employees under a situation being unable to refuse to receive such things in order to maintain a good relationship between such person or the organization, the employees should act as follows:

- (a) If value of such things should not be more than 3,000 Baht (three thousand Baht), the recipient must report the receipt of the gift, property or benefit to his/her respective Supervisor by using “Report Form for Receiving Gift, Souvenir or other Benefit of the Company”;
- (b) If more than 3,000 Baht (three thousand Baht), a permission must duly be obtained from the Supervisor before deciding to accept even it is specifically indicated that such thing is a personal belonging, but, it is a must to receive for the reason to maintain a good relationship and after receiving such gift, property or benefit shall be forwarded onto his/her Supervisor by using “Report Form for Receiving Gift, Souvenir or other Benefit of the Company”;
- (4) In the case where an authorized person to give the approval or a Supervisor has considered that it is unsuitable to accept a gift, souvenir or any other benefit, the recipient shall return it to the giver immediately. If being unable to return, it shall be given to the Administration Department or the Head Office and shall be regarded as the right and assets of the Company
- (5) Gifts or souvenirs given to the Company representatives and are regarded to be valuable to recollect as the important events of the Company: such as; receipts of prestigious awards, souvenirs from Social Aid Contribution Activity, etc.; shall be allowable for personnel of all levels to receive on behalf of the Company by providing reports on the acquisitions and storages of those gifts according to the “Report Form for Receiving Gift, Souvenir or other Benefit of the Company”.

Provided, however, that the Administration Department or Head Office shall prepare a conclusion on the receipts of such gifts, properties or benefits for presentation to the Company Board of Directors and further onto the Audit Committee, at least, twice a year to approve the receipts of such items.

6. Political support and assistance:

Definition :Political support and assistance means support, both monetary and non-monetary to political party representatives (political parties, , politicians group or political candidates). Non-monetary support includes lending or donating any materials or equipments.

Guidelines on political support and assistance

1. Company has no policy to provide financial support or items, benefits or facilities, including the sale of goods or services without charge to political parties or politicians. In the event of receiving a request for political assistance from a political party or politician. Company will not provide assistance, *except for the purpose of promoting democracy.*
2. Company will remain politically neutral and will not act in a way that favors or supports any political party or any person with political power.
3. Executives and employees shall not engage in political activities of personal interest during Company working hours or by using Company resources (e.g. email, telephone) without permission from the authorized persons.
4. Do not use the Company's budget for political activities or social duties without permission from the authorized persons.
5. Company realize and respects the freedom to exercise political rights, such as voting or being a member of a political party.

Procedures for political support and assistance

1. Political party representative writes a letter of intent to Chairman.
2. Chairman considers according to the specified criteria and specifies the procedures in the letter of intent and forwards to the administrative department to proceed.
3. Disbursement
 - 3.1 Cash disbursement shall be in accordance with the specified operating authority.
 - 3.2 Goods disbursement shall be in accordance with the disbursement of the warehouse and sales departments.
4. The administrative department shall prepare a summary report of political support and assistance annually so that it can be audited.
5. The internal audit shall review the processes and procedures to ensure in accordance with criteria annually. Ensure for a proper internal controls and not facilitate corruption.

7. Charitable Donations:

The Company has a policy and practical guidelines that the donations for charity, public interests shall be in a transparent and lawful way and not contradictory to a moral nor shall they be used as an excuse for bribery.

8. Sponsorships:

The Company has a policy and practical guidelines that support the sponsorships for various projects must have a purpose for the business and good image and reputation of the Company and that it must be granted under the Company's name only.

9. Facilitation Payment:

Means a small amount of expenses paid informally to a government official. It is given to ensure that the government official will proceed with the actions according to the process or to persuade such official for faster action without having such process being required to rely on the discretion of government official and it is regarded as a legal act in accordance with the duties of that State official as well as being a statutory right of a corporate entity which it should have under the law: such as; in applying for a license, certificates and in receiving the public services, etc.

The Company has no policy to make any form of facilitation payment, both directly and indirectly, and that under no circumstances shall the Company proceed with any action or agree to accept and does any action in exchange for a facilitation of business operation.

10. Revolving Door:

A government official means a person being or used to being a government official/politician/counselor to a government agency and come to work for a private-run company and may rely on the relationship or internal information to benefit such private-run company or cause a conflict of interest in the performance of duties of the government agency or the regulatory organization monitoring controls over the business of the companies under its supervision whereby the consequences of such act is contemplated at the creation of unfair business advantages or the set out of a policy in favor of such private entity for which such government official has worked.

The Company has no policy to hire or appoint a government official who is still having a term of office to work in the Company unless otherwise such official has vacated office for a period of 2 years, at least, with a due diligence process conducted and prohibitions on the performances of duties and practical procedures to prevent power abuse or an issue of a conflict of interest: such as; a disclosure of confidential information of the government agency to which he/she used to belong, lobbying to gain unfair advantage, being assigned to contact his/her original agency to which he/she used to belong.

11. Conflict of Interest:

Directors, management personnel and employees of all levels in the organization must avoid any conflict of interest with the Company. Any actions undertaken must be reasonable on the ground for the benefit of the Company with no contradiction to the Company's Code of Conduct, relevant Laws, Rules and Regulations. Provided, however, that if there should be any action or circumstance considered to be in line of a conflict of interest with the Company, such personnel shall have duties report such conflict of interest through the channel specified by the Company.

The expenses incurred as a result of the charitable donations, grants of sponsorships, costs of the gifts, hospitality services and other expenses as mentioned above must be subject to the scrutiny and approval process according to the Company's Regulation as follows to prevent the Company from being involved in the corruption practice:

- Approved by the person authorized to approve the transactions;
- Must be substantiated by valid documentary evidence on proper disbursements;
- Must be audited by the Finance Department that the payment approver has the authority to approve transactions in accordance with the Regulations prior to the disbursements.
- Accounting Department checks various payment proofs to ensure that they are accurate and that such expenses can be recorded in terms of bookkeeping.

Communications:

The Company communicates various information related to the anti-corruption measures in order to enable the employees, management personnel, shareholders, customers, agents, business partners, all groups of stakeholders and business related parties to be informed through both internal and external media through the regular staff meetings, notifications through the public relations board, website of the Company and the annual report, etc.

Punishments and Notification on Action Result:

1. Punishments inflicting on the employees committing wrongdoing shall be in compliance with the Company's Disciplinary Actions Regulations and/or Legal Penalty. The punishments will be determined based on the intention of the act and severity of the offence committed.
2. If the offender should be a director or chief executive officer, the Audit Committee shall hold a joint discussion with the Company Board of Directors to determine the infliction of the punishment as they deemed appropriate and/or to proceed with legal actions according to the Rules, Regulations on the Practical Guidelines of the Stock Exchange of Thailand and Office of the Securities and Exchange Commission to impose the disciplinary penalties for violations starting from a written warning, wage cut,

temporary suspension without pay or dismissal from duty. The punishment will be determined based on the intent of the act and the seriousness of such offence.

3. In case of being able to contact the whistleblowers or the grievant, the Company will inform them on the result of the actions in writing.

Follow-ups and Review:

1. The Company implements measure on the follow-ups and review of this policy continuously on a regular basis whereby the Risk Management Sub-Committee shall be the party making considerations on the varied risks, report on the sufficiency and effectiveness of the anti-corruption measures to the Company Board of Directors regularly on a quarterly basis in order to map out guidelines on the corruption risk.
2. The Internal Audit has the duties to audit the internal control system and various processes regularly. In addition, the Compliance Unit is responsible for reviewing legal compliance and anti-corruption and reporting the results to the Audit Committee on a regular basis. However, if any material issues should be discovered, they must urgently be reported.

The Audit Committee is responsible for making report on the Minutes of Meeting and recommendations to the Company Board of Directors on a quarterly basis.

All executives and employees of the Company are expected to support and strictly adhere to this policy, in order to ensure that the Company's operations are conducted efficiently, transparently, and in accordance with the principles of good corporate governance.

Notification made of this 10 February 2025

--Roongroj Saengsastra--

(Mr. Roongroj Saengsastra),
Chairman

The Company established this policy and promulgated it on 22 October 2013. It was first revised on 9 August 2021, with subsequent second revision, dated 10 February 2025 which is the current version.