



ANTI-FRAUD AND CORRUPTION POLICY

TRIPLE I LOGISTICS PUBLIC COMPANY LIMITED AND ITS SUBSIDIARIES

Section 1: Principle, Definitions, Policy, Duties and Responsibility, Practices

1. Principle

Triple i Logistics Public Company Limited intend and dedicate itself against all forms of fraud and corruption. In so doing, the Company has created this policy and practices along with procedures to prevent potential frauds and corruptions to be used in the conduct and decision in any businesses that may involves in fraud and corruption risks for which that matter would be able to be decided correctly and fairly.

The Board of Directors approves the revision of the Anti-Fraud and Corruption Policy and implement the Anti-Fraud and Corruption Handbook along with other written policies and practices to be use as a clear guideline for business conduct for the Company's long-term sustainability.

2. Definitions

'Corruption' – An act or behavior to seek unlawful gains by means of giving, offering to give, promising, receiving, taking bribery for self and others' benefits. This includes self-act or actions through other individuals in all forms including government officials, private organization officials, regulating bodies or charitable organizations (thereafter, the 'officials') involving actions and officials within and outside the country for such officials to act or neglect duty or abuse the power to gain or maintain businesses or to be treated or given illegal advantages or to creating undue persuasion in official's decisions

'Fraud' – Seeking to gain benefits through inappropriate or illegal means by the directors, executives, employees of the Company's or its subsidiaries and the contract partners and their subsidiaries. This may include falsifying financial record, taking the Company's properties for personal use, misappropriation embezzlement and fraud. The examples are;

'Corruption payments or wrongful payments' – An act of giving financial or assets or other incentives directly from the Company or its subsidiaries or through customers/business partners or third parties.

'Giving-receiving gifts, hospitalities or other benefits' – An act of giving-receiving gift, assets or other benefits and hospitalities (entertainments) including



sponsorships, donations or political contributions and the conflict of interests in monetary, material or any forms that may incur the risks of fraud and/or corruption that may cause undue influence on the decision making at work.

‘Bribery’ – The offering, promising to offer, receiving, demanding of financial, asset or any undue benefits to the government officials or private organization employees, directly or otherwise in exchange for actions or neglections of duty to acquire or secure undue business or other benefits unless such actions are allowed by law, rules, regulations, announcement based on the local traditions and business cultures.

‘Conflict of interests’ – The situations or the actions in which board members or the Company’s employees gain personal benefits including their circles which affect the professional decision’s impartiality thereby giving themselves higher benefits over the others. The actions and situations may or may not be intentional and occurring with awareness or otherwise. It can come in many forms and becomes the ‘normal state of things’ without being considered as wrongdoings thereby undermining the fair judgement given the conflict of the interests.

‘Facilitation payments’ – Unofficial small payments made to the government officials to ensure that the officials will execute their duties or to encourage timely executions of duty. Such duties must not require discretion of the officials in question and their executions are authorized and lawful. The executions of duty must be for the tasks that are permitted by law such as obtaining permission, certification and public services, etc.

‘Gifts’ – Any objects with financial value such as commodity, cash substitute for goods, services transportations, accommodations and meals.

‘Entertainments’ – Providing meals and drinks, artistic performances, sport spectators, participation in sports such as golfing and entertainment activities, etc.

‘Hospitalities’ – Hosting and providing assisting business contacts with friendliness, providing care and service to create comforting and satisfactory experience.

‘Financial contributions’ – Monetary payment given to or accepted from the customers, contract partners and business partners for business, branding and reputation of the Company for the purpose of creating business credibility and forging business relationships as opportunity arises.



‘Charitable donations’ – Donations of fund or items or other benefits to individuals or legal entities which may have vested interest such as charitable organizations, foundations and trust funds, etc.

‘Government officials’ - Individuals who are the current or former government officials, politicians, advisers to the government agencies who are employed by the Company and may use their personal connection or professional information for the benefit of the Company or in the conflict of interests position. Government officials/employees mean individual who hold political appointments, government officials or local government employees with earn monthly salary or regular income, state enterprise employees or employees of government agencies, local administration executives and member of local administrative bodies which are not considered as political appointments, officials under the local administrative laws and include committee members, sub-committee members, employees of government agencies, state enterprises or state-owned bodies and individuals or groups of individuals who authorize or given authority on the administrative power to execute government matters as stipulated by laws.

‘Subsidiaries’ – The subsidiary companies, and companies working with the Company or its subsidiaries with controlling power.

‘Company personnel’ – The directors, executives and employees working in all positions in the Company and its subsidiaries.

3. Policy

Preventing frauds and corruptions of utmost importance. The Board of Directors approves the implementation and revision of the Anti-Fraud and Corruption Policy alongside the Corporate Governance Policy and the Code of Conduct. This Anti-Fraud and Corruption Policy lays down the principle for a shared-understanding of the Company and its subsidiaries’ personnel as the standard practice and guideline which are as follow;

- (1) The Company, its subsidiaries and personnel must not execute or participate in all forms of fraud and corruption, direct or otherwise. The business conducts must be rightful, direct and ensured that no dubious questions arise from the conduct and the reputation is unaffected in all manner. All conducts must be under the good governance practice. There shall be no bribes or facilitation payments to the government and private officials to act or neglect duties to secure or maintain business or other undue benefits or to ensure the executions of tasks in accordance to the process or to encourage faster execution of such tasks which may



lead to corruptions. Also, this includes the control on charitable donations, prohibition on political contributions, giving business gifts and financial contributions as follow;

- Never take or demand financial, assets or other benefits from individuals with intent to wrongly persuade and dissuade certain actions.
 - Never give or offer to give financial, assets or other benefits to the parties involving in business conduct such as individuals, legal entities and organizations that are in contact with the Company or having relationship with in both private and public sectors along with charitable organizations that may lead to wrongful persuasion or dissuasion for certain actions.
 - Never give or offer to give financial, assets or other benefits to persuade individuals to execute task processes or to encourage faster executions of such tasks which may lead to frauds and corruptions.
- (2) The Company, its subsidiaries and its personnel shall maintain non-partisan political position and shall not act in any manners with which to be interpreted as supporting or partisan to a particular political party or individuals with political power. Never contribute with finance or assets in any forms to political parties or to individuals with political power with intent to act or neglect upon wrongful actions.
- (3) The Company, its subsidiaries and its personnel shall implement the procurement system that contain the process and procedure to control and monitor procurements and acquisitions, billings and payments with systematic recordings for references and auditing purposes.
- (4) The Company, its subsidiaries and its personnel shall conduct risk assessment on the activities that may involve the risks of all types of fraud and corruption, the risk assessments on fraud and corruptions must be reviewed and assessed at least once a year.
- (5) The Company, its subsidiaries and its personnel shall conduct regular internal controls to prevent employees from engaging in inappropriate actions or frauds and corruptions.
- (6) The Company, its subsidiaries and its personnel shall arrange for anti-fraud and corruption education to the directors, executives and employees in every position to build honesty and responsibility and to show the determination of the Company and its subsidiaries in preventing all forms of frauds and corruptions.

- (7) The Company, its subsidiaries and its personnel shall publish financial reports with the Auditing Committee being responsible in financial audit. The Accounting and Finance Department and the auditor shall conduct meetings and present financial reports to the Board of Directors on a quarterly basis. The reporting mechanism must be accurate and transparent under the international accounting standard.
- (8) The Company, its subsidiaries and its personnel shall implement the human resources management process that reflect the determination of anti-fraud and corruption measures with multi-channels communications to the personnel and relevant parties and whistleblowing channels. The whistleblowers shall be confident of protection without fear of punishments or unfair transfer or harassment in any forms. This shall include the appointment of responsible individuals to monitor and investigate the reported matters from the whistleblowers.
- (9) The Company, its subsidiaries and its personnel shall conduct businesses in compliance with anti-fraud and corruption laws of every country that the Company and its subsidiaries operate in.
- (10) Violations of this policy by the Company's personnel, direct or otherwise will be considered as a breach of relevant regulations and shall be disciplined as stipulated by Company and its subsidiaries' regulations along with applicable legal actions.

4. Duties and Responsibilities

(1) Board of Directors

The Board of Directors has a duty and responsibility to implement policy and supervise the effective support the anti-fraud and corruption system to ensure that the management team is aware and give importance to anti-fraud and corruptions matter which translate into the Company's culture.

(2) Audit Committee

The Audit Committee has a duty and responsibility to audit accounting and financial reporting system and implement internal control system, internal audit system and risk management system in compliance with the international standard. Such systems shall be robust, practical and effective along with monitoring and preventing any actions that may involve frauds and corruptions.

(3) Management Committee

The Management Committee has a duty and responsibility to implement systems along with encourage and support anti-fraud and corruption policy to communicate to personnel and relevant parties in all departments. Also, it shall review the suitability of systems and measures to be in line with changes in the Company's business, regulations and legal requirements.

(4) Internal Audit Department

The department has a duty and responsibility to conduct internal audit on work activities to ensure that such activities are in compliance with the policies, practices, authorization, processes, legal and regulatory requirements. This is to ensure that the Company and its subsidiary have sufficient and appropriate control and practice to mitigate fraud and corruption risks and it shall be reported to the audit committee.

(5) Departmental Executives

The departmental executives have a duty and responsibility to supervise the work in accordance to the Anti-Fraud and Corruption Policy and the Anti-Fraud and Corruption Handbook along with any relevant policies.

(6) Employees

The employees have a duty to comply with the Anti-Fraud and Corruption Policy and Anti-Fraud and Corruption Handbook along with any relevant policies.

(7) Company's personnel

The Company's personnel have a duty to understand and comply with the Anti-Fraud and Corruption Policy throughout every work process. Any actions that may be in breach of this policy must be reported to the chairman of the board, chair of the Audit Committee, chair of the Corporate Governance Committee, head of the department or individuals appointed by the Company to function on anti-fraud and corruption duties.

5. Practice Guideline

- (1) Every personnel of the Company irrespective of his/her position must comply with the Anti-Fraud and Corruption Policy and the Anti-Fraud and Corruption Handbook along with the Corporate Governance Policy, the Policy and Practice Guidelines for Whistleblowing and Whistleblower Protection and the Code of Conduct. The personnel shall not be involved in frauds and corruptions, direct or otherwise for personal, family and others' gains.



- (2) Every personnel of the Company irrespective of his/her position must not neglect when there are actions considered to be frauds and corruptions in the Company or its subsidiaries. The personnel shall report to his/her superior officer and co-operate with the investigation. Should there be questions, consult with the superior officer or individuals appointed by the Company and its subsidiary to handle whistleblowing activities through the provided channels.
- (3) The Company and its subsidiaries shall be fair and protect every personnel of the Company irrespective of his/her position who refuse to take part in or report frauds and corruptions as stipulated in the Policy and Practice Guidelines for Whistleblowing and Whistleblower Protection.
- (4) All of the Company's personnel irrespective of his/her position who is engaging in frauds and corruptions shall be considered as having misconduct in accordance to the Company and its subsidiaries' Code of Conduct and charter. Those found involving in misconduct shall face consequences as stipulated in the Company and its subsidiaries' charters and regulations along with legal actions in the event of legal breaches.
- (5) The Company and its subsidiaries understand the importance of disseminating, educating and creating an understanding of the obligations to comply with the Anti-Fraud and Corruption Policy and the Anti-Fraud and Corruption Handbook. This is applicable to all of the Company's personnel and individuals that involves in the activities which may have an impact the Company and its subsidiaries.
- (6) The Company and its subsidiaries endeavor to create and maintain the zero-tolerance on frauds and corruptions for transactions in both the public and private sectors.
- (7) To ascertain a clear guideline on the conducts on high-risk matters involving frauds and corruptions, the Company's personal in all positions must exercise caution when dealing with the following situations;
 - (7.1) Political Contributions

The Company and its subsidiaries shall not contribute to activities of any political parties. It shall maintain non-partisan position and shall not engage in any acts that may be partial to or in support of a political party or individual with political powers. There shall be no financial and/or material contributions to political parties to persuade wrongful actions or neglections of duty.



All personnel of the Company irrespective of his/her position has the democratic right and duty to take part or to support political activities freely in the personal capacity outside of the office hours and shall not use the Company's and its subsidiaries' resources for political activities.

All personnel of the Company shall study more on the political neutrality from the Company's political neutrality policy.

(7.2) Charitable donations

The Company and its subsidiaries may make financial or material donation from the Company and its subsidiaries for charitable purposes. However, such donations must only be made on behalf of the Company and its subsidiaries. The donation receiving parties must be foundations, charitable organizations, temples (wat), hospitals, medical facilities, or social enterprises. These organizations shall be listed and recognized by the Revenue Department and the Ministry of Finance and must be in compliance with the Company and its subsidiaries' terms or guidelines.

(7.3) Sponsorship or Financial Support for Businesses

The Company and its subsidiaries may donate its fund or assets to support or sponsor projects. The sponsorship must be made on behalf of the Company and its subsidiaries with the objectives of business dealings, building brand image and reputation of the Company and its subsidiaries. The sponsor payment shall be made with clearly stated objectives and verifiable evidence.

(7.4) Receiving and Giving Gifts

Receiving or giving gifts during festive seasons or in accordance to local traditions and business cultures is allowed in which the value of the gift shall not exceed 3,000 Baht. Should the value of the give exceed 3,000 Baht, report must be made to the superior officer or to the Legal and Compliance Department and must comply with Policy and Guidelines on Gifts, Hospitalities and Other Benefits. Gift-giving and receiving must be transparent and done on behalf of the Company or its subsidiaries and shall be accompanied with verifiable evidence.

(7.5) Hospitalities

Hospitalities or service payments may be made if deemed necessary as per business cultures and local traditions. Such payments are to be directly made for hospitalities or services that facilitate business



benefits and must be in compliance with relevant laws. The value of hospitality and service payments must be appropriate in its purpose and shall not create undue influence in decision and shall be accompanied with verifiable evidence in compliance with the Company's and its subsidiary terms and guidelines.

(7.6) Facilitation payments

The Company and its subsidiaries do not make facilitation payments, direct or otherwise. It does not tolerate any actions or act in anyway in exchange with business facilitation that may lead to frauds and corruptions.

Section 2: Relevant Policies, Administration and Dissemination of the Anti-Fraud and Corruption Policy

- (1) Relevant policies, the Board of Directors requires relevant parties to evaluate any relating policies and documentations of the Company and its subsidiaries,
- (2) The Board of Directors requires the review of the Anti-Fraud and Corruption Policy to be conducted every year including relevant policies
- (3) The Board of Directors requires the Administration Department to disseminate the Anti-Fraud and Corruption Policy via the Company's communication channels such as emails, website, securities and exchange regulators' reporting forms, or other appropriate channels. Inquiries on this policy may be made to the superior officer, officers in the legal and compliance department or any officers appointed by the Company and its subsidiaries.

All personnel of the Company and its subsidiaries must comply with the Anti-Fraud and Corruption Policy fully and it is a contractual obligation for employment. Any members of the board, executives and employees of the Company and its subsidiaries found to violate the policy and/or other relevant policies on anti-fraud and corruption shall be considered as in violations of charter or relevant regulations and shall face disciplinary actions based on the Company and its subsidiaries' regulations or legal actions.

This policy is effective from 9 November 2021 as per approval of the 9/2564 board of directors meeting.