



ANTI-FRAUD AND CORRUPTION HANDBOOK

TRIPLE I LOGISTICS PUBLIC COMPANY LIMITED AND ITS SUBSIDIARIES

Triple i Logistics Public Company Limited (the 'Company') and its subsidiary resolve to conduct business operations with honesty, transparency and fairness along with in compliance with the good governance principle. The Board of Directors has implemented the Anti-Fraud and Corruption Handbook. This handbook is to be used as a practice guideline on business conducts of the Company and its subsidiaries' personnel as a unique standard of the organization for conduct and to generate sustainable returns to the stakeholders.

Principle

Triple I Logistics Public Company Limited expresses its anti-fraud and corruption stance and dedication. In so doing, the Company has created this policy and practice along with procedure to prevent potential frauds and corruptions. The policy is to be used in the conducts and decisions in any businesses that may involve 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 adopts 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.

Definitions

'Corruption' – an act or behavior to seek unlawful gain 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, 'official') 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 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.



‘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, hospitality or other benefits’ – An act of giving-receiving gift, assets or other benefits and hospitality (entertainment) including sponsorship, donation or political contribution and the conflict of interests in monetary, property 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’ – 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 situation or the action in which the directors or the Company’s employees gain personal benefits or benefits for the others in their circle which affect the professional decision’s impartiality thereby giving themselves higher benefits over the others. The action and situation may or may not be intentional and occurring with full awareness or otherwise. It may 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.

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

‘Hospitality’ – Hosting and providing assisting business contacts with friendliness, care 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 donation' – Donation 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 current or former government officials, politicians, advisers to the government agencies who are employed by the Company and may use personal connection or professional information to the advantage of the Company or in the conflict of interests position. Government officials/employees mean individuals 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 control power.

'Company personnel' – The directors, executives and employees working in all position in the Company and its subsidiaries.

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 international standards. Such systems shall be robust, practical and effective. The committee shall monitor and prevent any actions that may involve frauds and corruptions.



(3) Management Committee

The Management Committee has a duty and responsibility to implement anti-fraud and corruption system. The committee shall promote 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 audits 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 other 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.



Practice Guidelines

Political Activities

The Company and its subsidiaries have a political neutrality policy. It shall not act in the manner deemed as supportive or partial to any political parties or individuals with political power. It shall not provide financial or material contributions to political parties. The following guidelines shall be observed;

1. While the directors or employees may engage in political activities within legal bound, the directors or employees should not serve as a political party committee member or a political party's representative in public activities.
2. The directors and employees shall not use their position or property of the Company and its subsidiary to support political activities.
3. Avoid any actions that may be interpreted as being supportive or partial to any political parties by the Company or its subsidiaries.
4. The directors or employees must resign from the position at the Company should they take up political appointment or running for local or national election.

Charitable Donations

When the Company or its subsidiaries wishes to make financial or material donations for good cause or when individuals or organizations seek charitable donations from the Company or its subsidiaries, the following procedures must be adhered to;

1. The department wishing to make financial or material donations for charitable causes must assess if the donation in question is in compliance with charitable donations guidelines as stipulated by the Company in the Anti-Fraud and Corruption Policy and/or Policy and Guidelines on Gifts, Hospitality or Other Benefits.
2. Examine the relevant information on the donation. For example, a clear objective of donation, the existence of the donated organization and responsible parties.
3. If the guideline is met, the department wishing to make a donation should lodge donation application as stipulated in the donation, financial sponsorship and business funding approval process.



4. The department wishing to make a donation and/or the accounting and finance department shall produce donation payment/transfer receipt documents.
5. The accounting and finance department should arrange for a donation cheque to be signed by the authorized individual and follow up on payment evidence accurately. For material donations, the evidence of property transfer must be kept. All of the documents must be kept in the accessible filed in a verifiable manner.

Financial sponsorship or Financial Support for Businesses

Should the Company or its subsidiaries wishes to make financial or material sponsorships to support activities or individuals or organizations seeking financial or material sponsorship from the Company or its subsidiaries, the following procedures must be complied to;

1. The department wishing to make financial or material donations for charitable causes must assess if the sponsorship or financial support in question is in compliance with the Company's Anti-Fraud and Corruption Policy and/or the Policy and Guidelines on Gifts, Hospitalities and Other Benefits
2. Examine the relevant information on the sponsorship. For example, a clear objective of sponsorships, the existence of the sponsored organization and responsible parties.
3. If the guideline is met, the department wishing to provide sponsorship or financial support should lodge financial sponsorship and business funding approval request.
4. The department wishing to provide sponsorship and/or the accounting and finance department shall produce donation payment/transfer receipt documents.
5. The accounting and finance department shall arrange for a donation cheque to be signed by the authorized individual and follow up on payment evidence accurately. For material support, the evidence of property transfer must be kept. All of the documents must be kept in the accessible filed in a verifiable manner.



Giving-receiving gifts, hospitality or other benefits.

The Company and its subsidiaries or departments wishing to receiving or giving gifts, providing hospitalities to individuals or external organizations in accordance to local traditions and business to foster relationships in a lawful fashion may do so provided that;

1. The department or sections requesting or accepting request shall assess whether the receiving-giving gifts and hospitality is in compliance with the Company and its subsidiaries' Anti-Fraud and Corruption Policy and the Policy and Guidelines on Gifts, Hospitalities and Other Benefits.
2. If the request is in compliance with the aforementioned polices, the relevant departments may apply for approval by authorized individual specified by the Company or its subsidiaries.
3. The accounting and finance department shall verify documentations for payment receipt. And arrange for a cheque to be signed by the authorized individual. All relevant documents must be kept in the accessible filed in a verifiable manner.

Facilitation Payments

The Company and its subsidiaries do not make facilitation payment, 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.

Business Partner Discounts

Discounts in financial or other valuable forms should be in line with normal business conduct without inappropriate purposes. The discounts shall be giving on behalf of the Company and its subsidiaries only and discounts shall not create unfair influence in decision makings.

Trading and Investments

The Company and its subsidiaries shall conduct its trading and investments with business partners, competitors, shareholders and the society in compliance with the Code of Conduct. The Company and its subsidiaries do not have a policy to seek, accept, offer or give financial or other benefits to individuals or organizations in exchange for contracts, benefits, treatments or neglections of duty that are unlawful or in violation of the good conduct.



Taking and Giving Loans and Entering into Obligations

The Company and its subsidiaries do not have a policy to seek, accept, offer or give financial or other benefits to individuals or organizations in exchange for loan arrangement, lending or entering and leaving obligations of the Company that are unlawful or in violation of the good conduct.

Procurements

The Company and its subsidiaries have implemented procurement process and policy which are in compliance with the laws and social norm on vendor selection. The Company and its subsidiaries do not have a policy to seek, accept, offer or give financial or other benefits to individual(s) or organizations in exchange for assets or materials that are substandard and fail to meet the procurement specification. It shall also refuse to accept substandard services and any services that fail to meet the agreement. Such incidents shall be reported to the superior officer immediately to jointly find solutions and may results in the rejection or delay of product and service deliveries should there be any damage to the Company, its subsidiaries and its contract partners.

Employee's expense payments

Any expense payments paid by the Company and its subsidiaries to the employees may be made to their accounts through the Company and its subsidiaries' payroll system that include salary, wage, overtime, and other welfare payments. Alternatively, payments may be made using cheque or cash such as fuel and telephone expenses. Expense payments can be made provided that;

1. The department or section seeking payment approval shall assess whether the payment is relevant to the Company or its subsidiaries' business
2. For employee expense payment such as salary or overtime, the HR Department shall make decision and ask for approval and make payment through the Company and its subsidiaries' payroll system. For employee other expenses, the department head shall verify the information before the payment approval as specified by the given authority.
3. The Accounting and Finance Department shall produce payment receipt for accounting record. Calculating for income tax payment and arrange for a cheque to be signed by the authorized individuals. All relevant documents must be kept in the accessible filed in a verifiable manner.



Financial Dealing and Accounting

Paying and Receiving of Fund

The Company and its subsidiaries implement the following payment and receiving of fund practices

1. Receiving payment from customers, legal entities and other individuals
 - 1.1 Before the receipt of each payment, the Accounting and Finance department must be aware of the purpose and have the reasonable ground of payment.
 - 1.2 Payment receipt may be issued as evidence to the payers and shall be accompanied with the documents that are in compliance with accounting practices.
 - 1.3 If the payment is deemed to be unlawful or unfit for purpose, the payment shall be refused and the executive must be notified to find prevention and mitigation measures.
 - 1.4 Ask for co-operations from the payer to pay only with a crossed cheque with 'A/C PAYEE' notation or to make payment through bank transfer to the Company and its subsidiaries. Cash payment shall be receiving under the mechanism that ensure that the paid cash is deposited into the Company or its subsidiaries' bank account.
 - 1.5 It is forbidden to deposit payments into employee or other accounts that the Company and its subsidiaries has no payment authority. The payer shall also be forbidden from doing so.
 - 1.6 It is forbidden to seek, receive, offer to give or give financial or other benefits to the payer to delay the payment to the Company or its subsidiaries or to cause damages from unpayment, delay payment or incomplete payment.
2. Payment of Fund to the Creditors, Legal Entities and Other Individuals
 - 2.1 Accounting entries must be made by the Accounting and Finance Department for each payment. The payment must be in compliance with accounting standards and laws.



- 2.2 Incidents of incorrect or in appropriate payment must be reported to the superior officer and the solution for prevention and corrective actions must be found in accordance to accounting standards and laws.
- 2.3 Authorization for each payment must be as stipulated in the corporate authority index.
- 2.4 For cheque payment, a crossed cheque with 'A/C PAYEE' notation shall be used. Alternatively, payment may be made through bank transfer Cash payment shall be made under the mechanism that ensure that the cash is deposited into the payee's bank account and must receive evidence of payment as required by law (The revenue code).
- 2.5 Creditors or payees shall be treated equally without prejudice. Payment shall be made based on the appropriately agreed terms.
- 2.6 It is forbidden to seek, receive from, offer to give or give financial or other benefits to the creditors or payees in the manner that may damage the Company or its subsidiaries or to cause damages from unpayment, delay payment or incomplete payment.

Human Resources and Trainings

The Company and its subsidiaries have implemented personnel management process that is in compliance with the Anti-Fraud and Corruption Policy, the Policy and Practice Guidelines on Stakeholders' Protection, the Government Officials Employment Policy, the Policy and Practice Guidelines for Whistleblowing and Whistleblower Protection. The conditions are as follow;

- 1. Personnel recruitments shall only include individuals who have no history or involvements with fraud and corruption in any forms
- 2. Orientation and training for the employees, executives and directors shall be made to create the understanding on the Anti-Fraud and Corruption policy that enables the personnel to conduct business appropriately leading to the fostering of corporate culture.
- 3. Evaluate personnel's work performances and promotions with fairness. Personnel who report wrongful actions or refuse to participate in wrongful actions shall be protected and shall face no adverse consequences including



demotions, punishments or any negative impacts even if the refusal or participation may cause the Company to lose business opportunities.

Whistleblowing Channels

The Company and its subsidiaries have implemented the Policy and Practice Guidelines for Whistleblowing and Whistleblower Protection. The information is published on the Company's website and the financial reports for the financial market. Whistleblowing may be made through the following channels;

Address to:

Chairman of the Board of Directors / the chair of the Audit Committee, the chair of the Corporate Governance Committee, the Chief Executive Officer and the Management Committee / and/or the manager of the Compliance Corporate Governance Department.

1. Written report: Triple i Logistics Public Company Limited
628 Triple i Building, 3rd Floor, Soi Klab Chom, Nonsee Road, Chongnonsee, Yannawa, Bangkok 10120
2. Email report: whistleblowing@iii-logistics.com
3. Verbal report: Compliance corporate governance manager
4. Suggestion boxes
5. Website: www.iii-logistics.com

Communication Channels

The Company may communicate with the relevant parties through the following channels;

1. General communications to the relevant parties may be made through;
 - 1.1 Announcements on the Company's website.
 - 1.2 Publications of leaflets or brochures for distribution to customers, business partners, stakeholders or the public members.



2. Communications to the personnel

- 2.1 Employee's notice board may be used to post announcements on the Anti-Fraud and Corruption Policy and other policies to create awareness and correct work practice.
- 2.2 Orientation for new employees and training for the employees, executives and directors shall be made to create an understanding on the Anti-Fraud and Corruption Policy that enable the personnel to conduct business appropriately leading to the fostering of corporate culture.
- 2.3 Announcements via the Company's intranet system may be made on Anti-Fraud and Corruption Policy and other policies to create awareness and correct work practices.

Disclosures

The Company and its subsidiaries shall disclose their information on anti-fraud and corruption measures to the employees, executives, shareholders, customers, business partners, all stakeholders via the Company's website and/or the report form of the financial market regulator and/or other channels as appropriate. This is to ensure that all parties share the same practice and understanding and to ascertain transparent and accountable conducts of the Company and its subsidiaries.

Financial Entries and Record Keepings

The Company and its subsidiaries resolve to maintain work process standard and information technology system which are essential foundations for an effective control process. The Company and its subsidiaries shall conduct business operation in the manner which ensure that financial information is correct, complete, transparent and accountable. Also, there shall be an effective system for record keepings, accessing, maintenance and data backup that are available within the appropriate timescale. There shall be protections from misuses which may include the use for personal or associate's benefits and/or for conducting competing businesses with the Company or its subsidiaries directly or otherwise. The Company and its subsidiary have implemented the practice guidelines for storing, accessing, recording, maintaining and backing up of financial data as follow;

- 1. Documents and financial information shall be stored in a restricted storage, access, record and security system that prevent unauthorized individuals from using, revising, editing, deleting and or recording information both intentionally



and unintentionally. The system shall enable document and financial information to be verified and reviewed on a later date.

2. The executives and employees shall protect their accounts, usernames and passwords. These shall not be used or distributed or published to others without authorization.
3. Any personnel found to change, edit or tamper with the data resulting in the damages or potential damages to the Company and its subsidiaries, the Company and its subsidiaries reserve the right to access that personnel's computer usage including relevant accessories, data and information technology without prior consent from the personal in question.

Audit and Internal Control

The Company and its subsidiaries conduct annual internal audit through the Internal Audit Departments. The audit is independence and has no-restrictions in the auditing process. Furthermore, quarterly and annual financial audits are conducted by the appointed licensed auditor as required by the Securities and Exchange Commission, Department of Business Development and the Revenue Department

The Audit Committee shall implement effective and sufficient control process and internal audit process in the Company and its subsidiaries. Also, it shall ensure the legal compliance with the stock and trading laws, regulatory compliance with the Stock Exchange of Thailand and compliance with relevant laws on the Company and its subsidiaries' businesses.

Monitoring and Reviewing

The Company and its subsidiaries shall monitor and review the policy and guideline on an annual basis. All relevant departments shall monitor and review practice under its scope of responsibilities. Should there be any activities or business transactions found to be in potential violation of this policy or laws and regulations, such violations shall be reported to the Managing Director or those responsible for whistleblowing channels.

Departments Responsible for the Anti-Fraud and Corruption Policy Compliance

The approval for giving or receiving gifts or assets or other benefits or hospitalities or donations or sponsorship or financial assistance for business or political contribution shall be screened by the Legal and Compliance Corporate Governance.



This includes the screening for complaints and whistleblowing reports and responding to enquiries. This shall be in compliance with the Company's Policy and Guidelines on Gifts, Hospitalities and Other Benefits, the Political Neutrality Policy and the Policy and Practice Guidelines for Whistleblowing and Whistleblower Protection (Applicable as appropriate).

Punishments

The Company and its subsidiaries endeavor to prevent frauds and corruptions. The Board of Directors, senior management and all employees of the Company and its subsidiaries shall have an understanding of and comply with the Anti-Fraud and Corruption Handbook in every process of the work conduct.

The Company and its subsidiaries have stipulated the disciplinary process for the directors, senior executives and employees who fail to comply with the Anti-Fraud and Corruption Handbook resulting in the image and reputation of the Company. Any actions that result in the non-compliance or violation of this handbook shall face disciplinary actions as specified in the Code of Conduct or the Company and its subsidiaries' work regulation. Applicable legal actions may be made under the provision of the Policy and Practice Guidelines for Whistleblowing and Whistleblower Protection.

Should there be any conflicts in any of the Company and its subsidiaries' handbooks or practice guidelines, this handbook shall take precedence for the anti-fraud and corruption matters.

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