

# ANTI-CORRUPTION POLICY

Chow Steel Industries Public Company Limited

Approved by Board of Directors

## Anti-Corruption Policy

Chow Steel Industries Public Company Limited and its subsidiaries, affiliates, and other controlled entities are committed to conducting business with integrity, transparency, and accountability, adhering to good corporate governance principles. The company also places great importance on fostering and promoting a culture of good corporate governance within the organization for all directors and employees to follow. Therefore, the company has established an anti-corruption policy to combat all forms of corruption, recognizing the severe harm of corruption that undermines fair competition and causes damage to economic and social development.

To ensure that the company has established policies, procedures, and practices to prevent corruption in all business activities, the company has developed a written "Anti-Corruption Policy" to serve as a clear guideline for conducting business and developing towards a sustainable organization.

### Definitions according to the Anti-Corruption Policy

**Corruption** means any form of bribery, whether by offering, promising, accepting, soliciting, or receiving money, property, or other improper benefits, directly or indirectly, to a government official, state agency, private entity, business partner, third party, or person in authority, in order to induce such person to perform or omit to perform a duty that is to obtain or retain business, or to recommend business to the company in particular, or to obtain or retain any other improper business advantage, except where laws, regulations, notices, rules, local customs, or trade practices permit such action.

**Bribery** means any act in any form that is an offer, promise, giving, acceptance, or solicitation that results in various benefits in a manner that is intended to induce any act that is contrary to the law or contrary to one's duties. Benefits shall include gifts, services, cash, or other forms that may be given directly or through another person or for another person. Inducing any act shall include acts against a government official or a private sector official.

## 1. Anti-Corruption Policy

Chow Steel Industries Public Company Limited and its subsidiaries, affiliates, and other controlled entities are committed to conducting business with integrity, transparency, and accountability, adhering to good corporate governance principles. The company also places great importance on fostering and promoting a culture of good corporate governance within the organization for all directors and employees to follow. Therefore, the company has established an anti-corruption policy to combat all forms of corruption, recognizing the severe harm of corruption that undermines fair competition and causes damage to economic and social development. To ensure that the company has established policies, procedures, and practices to prevent corruption in all business activities, the company has developed a written "Anti-Corruption Policy" to serve as a clear guideline for conducting business and developing towards a sustainable organization.

Directors, executives, and employees of the company are prohibited from soliciting, accepting, or offering any form of gratification or property that could lead to improper conduct in the performance of their duties or result in any undue advantage to the company.

Directors, executives, and employees of the company are prohibited from offering or providing any form of gratification or property to any external party with the intent to induce that party to commit any act, or to refrain from committing any act, that is unlawful or contrary to their duties.

Any act that constitutes corruption is considered a serious offense. The company will take strict disciplinary action against the individual involved, in accordance with the company's regulations and applicable laws."

### Scope of Policy

This policy applies to all individuals associated with the company, at all levels. This includes directors, executives, employees, as well as subsidiaries, affiliates, and other entities under the company's control. Additionally, it covers third parties involved in the company's business, such as partners, customers, creditors, government agencies, government officials, state enterprises, and other related individuals.

## 2. Duties and Responsibilities

**2.1 Board of Directors:** The Board of Directors is responsible for setting policies and overseeing the implementation of effective anti-corruption systems to ensure that management is aware of and committed to anti-corruption practices, fostering a corporate culture that promotes integrity.

**2.2 Audit Committee:** The Audit Committee is responsible for reviewing the financial reporting systems, internal controls, and risk management systems to ensure that they comply with international standards and are adequate, up-to-date, and effective. This is to ensure that there are appropriate controls in place to address potential corruption risks and to report regularly to the Board of Directors on a quarterly basis.

**2.3 CEO and Executives:** The CEO and executives are responsible for establishing and promoting an anti-corruption policy, communicating it to all relevant employees, and reviewing the adequacy of systems and measures to ensure alignment with changes in the business, regulations, and legal requirements.

**2.4 Director of Audit:** The Director of Audit is responsible for auditing and reviewing operational activities to ensure compliance with policies, procedures, authorities, regulations, and regulatory requirements. This is to ensure that there are appropriate controls in place to address potential corruption risks and to report regularly to the Audit Committee on a quarterly basis.

**2.5 Directors, Executives, and All Employees:** All directors, executives, and employees must strictly adhere to the anti-corruption policy. Failure to comply with this policy will result in disciplinary action.

## 3. Anti-Corruption Practices

**3.1 Compliance:** All directors, executives, and employees at all levels of the company must strictly adhere to the company's anti-corruption policy and code of conduct. They must not engage in any form of corruption, directly or indirectly.

**3.2 Reporting:** Directors, executives, and employees must not ignore or disregard any suspected corrupt activities within the company. They must report such activities to their supervisor or designated person and cooperate in any investigations. If they have any questions or concerns, they should consult with their supervisor

or the designated person responsible for overseeing compliance with the company's code of conduct through the designated channels.

**3.3 Whistleblower Protection:** The company will protect employees who refuse to participate in or report corrupt activities related to the company. The company will implement measures to protect whistleblowers or those who cooperate in reporting corruption.

**3.4 Disciplinary Action:** Directors, executives, and employees who engage in corrupt activities will be considered in violation of the company's code of conduct and will be subject to disciplinary action in accordance with the company's established procedures.

**3.5 Awareness and Training:** The company recognizes the importance of disseminating information and educating individuals who are required to perform duties related to the company or who may be affected by the company's operations on the requirements of the anti-corruption policy.

**3.6 Prohibition of Corruption:** Directors, executives, and employees must not solicit, engage in, or accept any form of corruption for their own benefit, or the benefit of their family, friends, or acquaintances.

#### 4. Guidelines on Gifts, Entertainment, and Other Expenses

Giving gifts refers to company activities aimed at building positive relationships or marking special occasions. It is considered a social courtesy and can take various forms, such as goods and services.

Entertainment refers to providing food and beverages, attending performances or sporting events, participating in sports activities such as golf, or engaging in recreational activities to foster positive relationships with business partners.

The company has a policy of not giving or receiving gifts of any kind, including cash, to individuals or entities doing business with the company and its subsidiaries, except for customary gifts and entertainment that are reasonable in value. This is to maintain good business relationships without expecting specific preferential treatment that would be considered unethical. Gifts and entertainment should adhere to the following guidelines:

4.1 Must be in accordance with customary practices.

4.2 Must not violate any laws, regulations, or good corporate governance principles, and must comply with the company's relevant policies.

4.3 The value of gifts given or received must not exceed 3,000 baht, and employees must report such transactions to their supervisors through the "Report of Giving or Receiving Gifts, Presents, or Other Benefits" form. The following information must be included in the request form:

4.3.1 Gift-Giving Procedure:

- The requester completes the request form. The gift request is submitted to the supervisor for approval according to the authorized authority, approval process, and procedures for advance payments. The following information must be included:

- Purpose and details of the recipient of the gift, present, or other benefits.

- Relationship between the recipient and the company and its personnel.

- Amount (in accordance with company policy).

- Once the request is approved, the requester contacts the finance department to request an advance payment according to the procedures.

- The finance department verifies the approved request, records the payment, prints a payment voucher from the system, and makes an advance payment to the requester according to the approved payment procedures and transfers the funds to the requester's account.

- The finance department is responsible for tracking the clearance of advance payments, verifying and recording the clearance of advance payments, and collecting related documentation and submitting it to the accounting department for verification and recording.

- The accounting department verifies the accuracy and completeness of the advance payment documentation, records the transaction in the accounting system, and stores the supporting documents for future reference and audit.

#### 4.3.2 Receiving Gifts: -

1. Directors, executives, and employees who receive gifts or benefits must assess whether the acceptance of such gifts or benefits is in compliance with the company's policy.

2. The recipient must complete the "Gift Receipt Form" and submit the form along with the gift to their supervisor for review and verification of compliance with the company's policy. The supervisor will then forward the form and gift to the human resources department for verification and recording in the gift receipt log. The gift will then be used for the company's benefit.

- Guidelines:

1. Gifts or benefits must not be in the form of cash, gift cards, vouchers, or similar items.
2. Before giving or receiving gifts or benefits, it must be ensured that such actions do not violate any laws or company regulations.
3. Supporting documents for the payment of gifts, benefits, or other expenses must be properly stored for future reference.

4.4 Directors, executives, and employees must not receive any personal money or benefits from customers, suppliers, or any other party as a result of their work on behalf of the company.

4.5 Directors, executives, and employees must not lend or borrow money or solicit funds or items from customers or business partners, except for borrowing money from banks or financial institutions as a customer of such banks or financial institutions.

4.6 The company does not have a policy of offering money, incentives, gifts, special privileges, or any other form of inducement to customers, suppliers, external parties, or any individual to obtain

business, except for customary business entertainment, trade discounts, and company promotional programs.

4.7 Customary business entertainment is permitted to maintain good relationships with business partners, but it must be approved by the authorized person or supervisor within the approved budget. A quarterly and annual summary report must be prepared, and the internal audit department must conduct regular quarterly audits.

## 5. Charitable Donation Guidelines

**Definition of Donation:** A donation refers to the contribution of money, goods, or other benefits to individuals, legal entities, organizations, or public welfare agencies without expecting anything in return, such as foundations, charities, temples, and schools.

**Objective:** To promote and develop underprivileged youth by providing them with a suitable education based on their abilities and intelligence, and to foster their development of suitable careers in their local communities. These efforts are undertaken for the public good without seeking any personal gain.

5.1 The company has established the following policies and procedures for charitable donations:

5.1.1 It must be proven that the charitable project is genuine and that efforts are being made to support the project's objectives and benefit society as a whole.

5.1.2 It must be proven that charitable donation is not linked to any reciprocal benefits for any particular individual or group.

5.2 Guidelines for Monetary Donations:

5.2.1 The company will exercise caution when making donations resulting from requests, recommendations, or suggestions from government officials or business partners, as payments to such organizations may be considered indirect bribery to obtain or maintain business contracts, government permits, favorable tax or customs rulings, or business advantages.

5.2.2 The company must develop a plan that specifies the purpose, amount of the donation, and the intended recipient organization. The plan must be approved by the responsible party before being submitted to the executive for final approval.

5.2.3 Monetary donations must be approved by senior management and must comply with anti-corruption measures. A clear and correct receipt must be obtained for all donations.

## 6. Sponsorship Guidelines

Sponsorship refers to the provision of funds or other benefits to customers, partners, associations, foundations, or non-profit organizations with the objective of promoting the company's brand or reputation and fostering business relationships. The following procedures must be followed:

6.1 It must be proven that the recipient of the sponsorship has undertaken the specified activities and that these activities are aimed at achieving the project's objectives and benefiting society. There must be no misrepresentation for the benefit of any particular individual or group.

6.2 It must be proven that the provision of sponsorship or other benefits that can be quantified, such as providing accommodation and meals, is not linked to any reciprocal benefits for any individual or entity, except for customary business acknowledgments.

6.3 The company must exercise caution when providing sponsorship at the request, recommendation, or suggestion of government officials or business partners, as such payments may be considered indirect bribery to obtain or maintain business contracts, government permits, favorable tax or customs rulings, or business advantages.

6.4 The company must develop a plan that specifies the purpose, amount of the sponsorship, and the intended recipient organization. The plan must be approved by the responsible party before being submitted to the executive for final approval.

6.5 Sponsorship must be approved by the company's board of directors and must comply with anti-corruption measures. Charitable organizations must be registered with the Revenue Department or the Ministry of Finance, and a clear and correct receipt must be obtained for all sponsorships.

## 7. Political Involvement Policy

Political Involvement refers to the provision of financial or material support, participation in activities, or encouragement of employees to participate in political activities on behalf of the company to gain a business advantage. This does not include employees participating in political activities as individual citizens, provided they do not misrepresent themselves as company representatives or use company assets, equipment, or tools for any political purposes.

The company has a clear policy of not providing political support to any political party, party official, candidate, organization, or individual involved in politics, either directly or indirectly, except as required by applicable law.

The following guidelines are in place:

7.1 The company prohibits employees from using company assets to support any political party, group, or force in exchange for privileges or improper benefits, either directly or indirectly.

7.2 Employees have the rights and freedoms as citizens under the Constitution and other relevant laws in a democratic system to participate in political activities using their own resources and time.

7.3 Directors, executives, and employees must not participate in any activities or express any opinions that could be construed as the company being involved in or supporting any political party or group, which could lead to internal division within the company and the nation.

## 8. Conflict of Interest Policy

**Conflict of Interest** means any activity that may involve personal interests or those of related parties, whether by blood or other relationships, that could influence decision-making or hinder the company's best interests.

The following guidelines apply:

1. **Company Interests First:** Always act in the best interests of the company, in accordance with the law and ethics, with fairness and transparency.
2. **Avoid Conflicts:** Avoid engaging in activities that could create a conflict of interest for the company. Do not engage in businesses that compete with or are similar to the company's business.
3. **No Personal Gain from Company Information:** Do not seek personal gain from any information or assets obtained through one's position and responsibilities.
4. **No Outside Work Conflicts:** Avoid outside work that could negatively impact your company responsibilities.
5. **Disclosure of Interests:** Directors and executives must disclose to the company any personal interests or interests of related parties that are relevant to the company's management, including any direct or indirect holdings of the company's shares.
6. **Related Party Transactions:** The board of directors and executives must carefully consider conflict of interest issues related to transactions between the company and its subsidiaries or affiliates with honesty, reason, and independence, within the framework of good ethics, always considering the best interests of the company. They must also comply with the rules of the Securities Exchange Commission of Thailand and the Office of the Securities and Exchange Commission. Additionally, they must ensure that information on such matters is disclosed accurately and completely.
7. **Annual Disclosure:** The company will summarize the details of related party transactions that require disclosure in the annual financial statements (Form 56-1) and annual report.

## 9. Facilitating Payments Policy

**Facilitating payment** refers to a small informal payment made to a government official to ensure that the official will process a request or expedite it. This payment is typically made for a task that does not require the

official's discretion and is a duty that the official is already obligated to perform. Examples include obtaining licenses, certifications, or public services.

The company has a strict policy **prohibiting** the payment of facilitating fees to government officials under any circumstances. Such payments carry a high risk of being construed as bribes or illegal expenditures.

The company has the following guidelines:

1. **Prohibition of Bribery:** Company employees are strictly prohibited from offering, promising, or giving facilitating payments or bribes in the form of property or other benefits to government officials to induce them to take, omit, or delay any action that affects the company's operations.
2. **Transparency in Government Interactions:** All interactions with government entities must be conducted with transparency, honesty, and in strict compliance with all relevant laws and regulations.
3. **Communication of Policy:** The company will clearly communicate this policy to all employees and business associates.

## 10. Hiring Former Government Employees

Hiring former government employees poses a significant risk of corruption and conflicts of interest, particularly when the former employee previously had oversight responsibilities over the company.

The company has the following guidelines:

1. Former government employees must have retired or resigned from their government positions.
2. They must have no history of corruption or criminal offenses.
3. There must be a two-year cooling-off period after leaving government service before they can be hired.
4. All hires must be approved by a selection committee.
5. In cases where former government employees are hired, the company will publish their names and previous government positions on its website.

## 11. Reporting Corruption

All employees must report any suspected corrupt activities within the company to their supervisor or designated individual. If you have any questions or concerns, please consult your supervisor or the designated person responsible for monitoring compliance with the Chow Steel Industries Public Company Limited Code of Conduct through the specified channels.

The company pledges to protect all employees from retaliation for reporting corrupt activities in good faith. The company will communicate and disclose information related to anti-corruption measures to all stakeholders through various channels such as new employee training, Chow Energy Public Company Limited company news, bulletin boards, annual reports, and other appropriate methods.

The company discloses information to relevant stakeholders through annual reports, Form 56-1, the company website, and other appropriate means to ensure transparency and accountability in its anti-corruption efforts. The company will regularly review its anti-corruption policy to ensure compliance with relevant laws and regulations.

## 12. Grievance and Whistleblower Reporting

The Company has established a reporting channel for any illegal, unethical, or corrupt activities, or any conduct that may suggest corruption or misconduct by any individual within the organization, including employees, executives, and stakeholders.

### 12.1 Objective

To promote honest, transparent, fair, and verifiable business practices among executives and employees, in line with good governance principles and the company's code of conduct. The company encourages all employees to report any suspected violations of these principles. The company will investigate and take appropriate action to ensure that all matters are handled fairly, transparently, and in compliance with the laws and regulations of the Securities and Exchange Commission, which provides protection for whistleblowers.

## 12.2 Scope of Reporting

Reports can be made regarding any suspected violations of good practices, including violations of the company's code of conduct, governance principles, and anti-corruption policies, as well as any violations of company rules, regulations, or any unfair treatment.

## 12.3 Reporting Channels

Reports can be submitted through the following channels:

- Chairman of the Audit Committee
- Telephone: 02-0330910-14 ext. 241
- Email: Audit\_Com@Chowsteel.com
- Mail to: Chairman of the Audit Committee at the company's address. Reports will be presented to the Audit Committee quarterly.

## 12.4 Conditions and Consideration of Reports

Reports must be truthful and clear. All information received will be kept confidential, and the identity of the whistleblower will not be disclosed without their consent. Whistleblowers will be protected, regardless of whether they are employees or external parties. Those involved in the investigation process must keep all relevant information confidential and only disclose it when necessary.

## 12.5 Procedures

**12.5.1. Registration and Assignment:** Upon registration, the report will be classified according to its sensitivity. The Audit Committee, along with relevant department heads, legal, and internal audit, will investigate the matter and take appropriate action.

**12.5.2. Investigation and Recommendations:** The committee will gather facts and provide recommendations to those involved. If disciplinary action is necessary, the Human Resources department will be consulted. The findings and decisions will be reported to the CEO and the Audit Committee.

**12.5.3. Anonymous Reports:** For anonymous reports, the committee will report the findings and recommendations to the CEO for further instructions. If the complaint cannot be substantiated, it will be closed.

**12.5.4. Investigation Results:** If the investigation finds no wrongdoing or if the matter is resolved through counseling, the committee will recommend closure of the case and inform the whistleblower.

**12.5.5. Disciplinary Action:** If disciplinary action is necessary, the Human Resources department will initiate the process.

**Feedback to Whistleblower:** The whistleblower will be informed of the investigation's outcome within two weeks.

## 12.6 Whistleblower Protection

**12.6.1.** The company will keep the identity of the whistleblower and the accused confidential. Information will only be disclosed when necessary and with due consideration for the safety and well-being of the whistleblower.

## 13. Communication

The Company communicates information related to anti-corruption measures to employees, executives, subsidiaries, shareholders, customers, suppliers, all stakeholders, and business associates through monthly management meetings, bulletin boards, brochures, the company website, annual reports, and other appropriate means such as annual events and employee training.

## 14. Disclosure

The Company discloses information to employees, executives, shareholders, customers, suppliers, all stakeholders, and related parties through annual reports, the company website, and other appropriate means to ensure that the Company and its subsidiaries operate transparently and are accountable.

## 15. Data Recording and Retention

The company implements data-related activities in accordance with its policy, with a strong commitment to maintaining standards for systems, computer systems, and data communication systems, which are essential for building an effective control system. To achieve this commitment, the company has implemented the following standards and procedures:

**15.1 Assigning Responsibilities:** Defining the responsibilities of all users and administrators of systems and computer systems.

**15.2 Risk Assessment and Control:** Assessing risks and establishing appropriate control systems to address changing environments.

**15.3 Data, Systems, and Personnel Protection:** Implementing systems to protect data, systems, computer systems, and related personnel.

**15.4 Data Integrity:** Implementing systems to prevent unauthorized access, modification, or manipulation of data, whether accidental or intentional.

## 16. Internal Audit and Control

The company has established a regular annual internal audit process conducted by the company's internal audit department. The company grants the internal auditors full independence and unrestricted scope in their work. Additionally, the company undergoes quarterly and annual audits by an independent auditor, as required by the Securities and Exchange Commission.

The Audit Committee is responsible for implementing controls to ensure that business operations are conducted appropriately and in compliance with applicable policies, laws, and regulations. The Audit Committee regularly monitors and reviews whether employees are adhering to relevant policies and procedures and are in compliance with the specified laws and regulations.

#### **16.1 Reporting**

Internal audit reports are submitted to the Audit Committee on a quarterly basis and to the Board of Directors quarterly.

In urgent cases, the Head of Internal Audit shall immediately report to the Audit Committee and the Chief Executive Officer to prevent potential damage and follow up on the matter. Subsequently, the Board of Directors will be informed at the next quarterly meeting.

#### **16.2 Monitoring and Review**

The company has established a process to review and revise policies and procedures every two years. All parties involved, as per their assigned responsibilities, are required to monitor and review operational activities. If there is any suspicion that any activity or transaction may violate this policy or applicable laws or regulations, such information must be reported to the Chief Executive Officer or the relevant party through the designated reporting channel.

### **17. Approaches to Disclosing and Communicating Anti-Corruption Measures**

#### **17.1 General Communication Approaches**

17.1.1 Website Publication: Publish information on the company's website.

17.1.2 Brochures and Announcements: Distribute brochures or announcements.

17.1.3 Internal Network Communication: Utilize email, newsletters, and other internal communication channels.

17.1.4 Visual Representations: Develop materials or symbols representing the anti-corruption policy.

17.1.5 Collaborative Activities: Organize activities or campaigns involving employees, executives, subsidiaries, customers, partners, other stakeholders, or the general public, incorporating anti-corruption messaging.

## 17.2 Communication to Customers and Partners

17.2.1 Contractual Inclusion: Include anti-corruption provisions in contracts with business partners and customers. For example, a computer rental contract might include a clause stating that neither party shall solicit or accept any gratification from the other party.

17.2.2 Branded Materials: Use branded materials to convey the anti-corruption message to customers and partners, such as during holidays or business events.

17.2.3 Informational Materials: Send letters or documents to customers and partners to communicate the company's policy on gifts, entertainment, endorsements, and other related matters.

## 17.3 Communication to Employees, Executives, Directors, and Subsidiaries

17.3.1 Internal Communication Tools: Make company policies, anti-corruption manuals, and related documents accessible to employees through internal communication tools.

17.3.2 Notice Boards: Post announcements and policies on employee notice boards to keep employees informed.

17.3.3 Management-Employee Meetings: Conduct regular meetings between management and employees to discuss the anti-corruption policy and address any questions or concerns.

17.3.4 New Employee Orientation: Inform new employees about the company's anti-corruption policy during orientation.

17.3.5 Company Communication Channels: Utilize company communication channels such as bulletin boards.

## 18. Human Resources Practices

18.1 The company places great importance on human resource factors and will carefully consider these factors when selecting, training, evaluating, promoting, or compensating employees, as well as in awarding rewards. The company will strictly adhere to anti-corruption principles in all of these processes.

18.2 The company provides training to the board of directors, executives, and employees on anti-corruption policies and measures. This training is included as part of the new employee orientation program. Employees are informed of the measures they must follow and the consequences of any violations.

18.3 The company provides ongoing communication and training on anti-corruption policies and measures to ensure that employees have a thorough understanding of the company's anti-corruption initiatives.

18.4 The company protects employees who refuse to engage in corruption-related activities. The company has a policy of not retaliating against employees who refuse to participate in corruption, even if such actions result in a loss of business. This policy is clearly communicated to all employees through various channels, including bulletin boards, brochures, the company website, annual reports, and various company events. All departments within the company must strictly adhere to this policy.

## 19. Monitoring and Evaluation of Compliance with the Anti-Corruption Policy

The company has established the following procedures for monitoring and evaluating compliance with its anti-corruption practices:

19.1 **Self-Assessment:** The company requires all directors and employees to conduct self-assessments of their compliance with the company's code of conduct and ethics, which includes the company's corporate

governance policy, business ethics, and anti-corruption guidelines. This promotes employee engagement in anti-corruption efforts.

**19.2 Internal Audit:** The internal audit department is responsible for auditing the internal control system, risk management, and corporate governance. The department conducts audits based on an annual audit plan approved by the Audit Committee and reports significant findings and recommendations to the Audit Committee.

**19.3 Risk Management and Internal Control:** The risk management and internal control department is responsible for continuously assessing and evaluating the risk of corruption. The department ensures the effectiveness of anti-corruption measures and regularly reviews, updates, and presents the assessment results to the Risk Management Committee and, subsequently, to the Board of Directors.

## **20. Monitoring, Review, and Evaluation**

The Human Resources department will review this policy and submit it to the Board of Directors for approval if any changes are required. The department will also continuously monitor and evaluate the implementation of this policy and provide guidance as needed. Any necessary adjustments must be made as soon as possible.

## **21. Disciplinary Actions**

The company will impose disciplinary actions on employees, executives, and directors who violate this policy, as well as on their immediate supervisors who have neglected their duties or have been aware of violations but failed to take appropriate action. Disciplinary actions may include termination of employment. Lack of awareness of this policy or related laws cannot be used as an excuse for non-compliance.

## **22. Effective Date:**

This policy shall take effect on November 14, 2024.

Dated: November 14, 2024

(Mr. Anavin Jiratomsiri)

Chief Executive Officer