PRICISION MAKERS

บริษัท ยูบิส (เอเชีย) จำกัด (มหาชน)

UBIS (ASIA) PUBLIC COMPANY LIMITED

ANTI-CORRUPTION POLICY

UBIS (ASIA) PUBLIC COMPANY LIMITED AND ITS SUBSIDIARIES

No. 1/2026 Effective from November 12, 2026



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Anti-Corruption Policy

UBIS group is committed to preventing and prohibiting all forms of corruption, both direct and indirect. This Policy applies to all directors, executives, employees, and relevant parties across UBIS group. The company has established anti-corruption procedures and regularly reviews and updates its practices to ensure alignment with changes in business operations, regulations, and applicable laws, while upholding its commitment to conducting business with integrity and transparency. All directors, executives, and employees of UBIS group are required to strictly comply with this Policy. Any involvement in, support of, or cooperation with corrupt practices will result in disciplinary action or legal penalties, where applicable.

Definition According to Anti-Corruption Policy

Corruption means any act committed to obtain an unlawful or improper benefit in breach of one's duties or applicable laws, whether for oneself, associates, and/or others, in any form. Such acts include offering, promising, soliciting, demanding, giving, or receiving money, property, or any other undue benefit, directly or indirectly, to or from government officials, government agencies, private-sector entities, or persons entrusted with duties, as well as accepting or offering bribes to induce unlawful conduct. Corruption also includes falsification of documents or evidence, unauthorized personal use of company's assets, and conflicts of interest intended to induce the performance or omission of duties, or to obtain or retain an improper business advantage.

Political Contributions means financial assistance or other forms of assistance to support political activities, financial assistance such as loan, donation, other forms of assistance such as giving or service, advertising support political party, buying concert tickets for funding or donation to political party, allowing employees to take a day off or to be company's representative to join a political campaign.

Charity means activity involving money donation which brings about no tangible return.

Donation for Public Interest means donation for a project or activity which creates benefit for the community, society, and public group, while UBIS group may not get tangible return.

Sponsorships means giving of money for service or benefit which is difficult to evaluate and monitor and may be linked to corruption, for instance, sponsorship which has a hidden target by offering business or bidding opportunities, reducing or waiving fees, improperly facilitating or waiving licensing requirements, circumventing legal requirements, or providing access to government officials.

Gift and Hospitality Giving and Receiving

- **Gift** means anything of value that a person/company gives to another person/company without directly claiming compensation, the gift may be an object or may be in the form of other benefits.
- **Entertainment/Reception** means spending on business reception such as food and beverage, sports, and other spending directly related to business practices or commercial practices,

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including business negotiations which can be conducted, but shall be spent reasonably and do not affect operational decisions or cause conflicts of interest.

- **Hospitality** means attendance of social, culture or sport events with personnel or individuals who have, or may have, or who may facilitate business relationships with the company.
- **Local Tradition or Trade Tradition** means festivals and significant events often include the giving of gifts and provide occasions for people to express happiness, gratitude, welcoming, condolences, or offers of help that are commonly followed within the local community.

Facilitation Payment means a small amount of expenses unofficially paid to government officials and is sufficient to ensure that government officials carry out the process or encourage faster action. The process is not at the discretion of government officials and is in favor of the duties of the government officials, as well as the right that the juristic person should have in accordance with the law, such as obtaining or renewal of a license, requesting certificates, or receiving public services, etc.

Bribe means offering, giving, receiving, or soliciting something of value, often money or other assets, with the intent to influence the actions or decisions of a person in a position of authority or trust.

Kickback means any payment or benefit given to government officials or related parties in return for favorable treatment in obtaining contracts, concessions, or projects. Such benefits may include cash, gifts, entertainment, loans, or profit-sharing arrangements, potentially involving inflated project values in violation of applicable laws.

Conflict of Interest means a situation in which a person holds a trust position (e.g., attorney, legal counsel auditor, financial advisor, politicians, executives, or directors of private companies or government agencies). There is a conflict between personal interests and professional interests, resulting in there is a problem that he/she is unable to act impartially/unbiasedly because of conflicts of interest that has arisen. This may result in distrust toward to person regarding how much he/she can carry out his position in the morality.

Revolving Door means a person from the government sector who is working in the private sector or a person in the private sector who is working regarding a policy in the public sector, causing a risk of corruption in terms of conflicts of individuals interest with roles in both organizations. By making government officials unbiased oversight, or personnel in the private sector who are trying to encourage state policies to benefit their organizations.

The company means UBIS (Asia) Public Company Limited

Subsidiaries mean companies or legal entities in which UBIS (Asia) Public Company Limited, or subsidiary company holds more than 50% of the shares, whether held directly or indirectly.

Affiliated companies mean companies or legal entities that are related through direct or indirect shareholding or are under the control of the same person or legal entity.

UBIS group means UBIS (Asia) Public Company Limited and/or subsidiaries and/or affiliated companies as specified by the company as being subject to this Policy.

Directors mean the company's Board of Directors as specified in the company's certificate.

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Executives mean employees of the company who have been appointed to executive positions in accordance with the organizational structure or criteria established by the company.

Employees mean individuals employed by UBIS group to perform work, regardless of their positions or levels, including executives, whether employed on a permanent, daily, temporary, or special contract basis.

Partners mean suppliers, contractors, service providers, distributors, agents, brokers, consultants, or other contractual parties involved in UBIS group's business operations.

Agents or Distributors mean individuals or legal entities appointed by the company, its subsidiaries, or affiliated companies to act on their behalf in conducting business contacts, negotiating business transactions, or distributing products and services.

Customers mean purchasers of UBIS group's products and consumers of UBIS group's products.

Related Parties mean individuals, organizations, or entities with substantial business relationships, which can encompass government entities, state agencies, state enterprises, private sector organizations, and nonprofit organizations.

Stakeholders mean individuals or groups who have an interest in, are affected by, or have expectations of the Group's business activities, directly or indirectly, including directors, executives, employees, shareholders, business partners, customers, government agencies, and society.

Other Individuals/Entities mean individuals or legal entities that do not fall into the categories of directors, executives, employees, partners, customers, or related parties or stakeholders.

Procedure to Comply According to Anti-Corruption Policy

1. Directors, executives, employees do not accept or support all kinds of corruption directly and indirectly.
2. The company defines the operational procedure in activities that cause the risk of corruption to directors, executives, and all employees to comply as follows:
    2.1. The company has no policy to support any political assistance. In case of any expenses found to be related to support political assistance, it will be rejected.
    2.2. Donation for charity has the objective to develop social, economic, culture and educational activities that must be transparent, lawful, not be used for corruption and comply with the regulation on donation for charity of UBIS group.
    2.3. Financial assistance has the objective to build a company's reputation, tighten business relations to be transparent, legally, not to be used for corruption and comply with the regulation on financial assistance of UBIS group.
    2.4. Directors, executives, employees do not ask for, request, or give any objects or benefits to the person who is responsible related to UBIS group except such giving or obtaining is by local tradition or trade tradition.

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ISO 9001
ISO 14001
ISO 45001
BUREAU VERITAS
Certification

2.5. UBIS group does not pay and receive bribes in business operation directly or arising through persons acting on behalf of company, consultant, broker, contract party, partner, or intermediary under UBIS group's control directly. In addition, employees must refrain from engaging in any activities that may lead to or imply that UBIS group has paid or received a bribe in the form of fees for facilitation or commissions.

2.6. Executives and employees are obligated to fulfill their responsibilities in the best interests of UBIS group and to exercise prudence to avoid any potential conflicts of interest.

2.7. UBIS group has a strict policy against making or accepting financial requests or offering any form of benefits to suppliers or service providers in exchange for goods or services that do not meet the specified standards outlined in the purchase order or agreement. In the event of such occurrences, employees are mandated to promptly report them to the appropriate authorities and the procurement department for collaborative resolution.

2.8. UBIS group has a policy of paying commissions in accordance with the agreements for the appointment of distributors or consultants, or the commission payment criteria established by UBIS group. Such agreements and criteria must be approved by authorized persons in accordance with UBIS group's Delegation of Authority (DOA).

2.9. UBIS group does not hire or appoint individuals who currently hold government positions related to the government, except for those who have disengaged from government roles at least two years and seek employment as executives, managers, employees, or consultants within UBIS group. Such individuals are required to undergo the same recruitment and selection procedures as non-government employees, ensuring equal treatment and opportunity.

3. Implementing Anti-Corruption Policy into Practice

3.1. Communicate policy and operational procedure related to anti-corruption to directors, executives, employees, subsidiaries, affiliated companies, person acting on behalf of the company, consultant, broker, contract party, partner, to put into practice via specified channels.

3.2. Arrange the process in financial report preparation to be transparent and correct including arranging suitable internal control system that is effective to prevent inappropriate action.

3.3. Arrange personnel recruitment process, promotion, training, performance evaluation to reflect UBIS group's commitment to anti-corruption measures.

3.4. Do not demote, punish, or give adverse consequence to employees that refuses corruption even if action causes UBIS group to lose its business opportunity.

3.5. The person who commits corruption is considered to have acted unethically toward the company and will be punished in disciplined according to the regulation related to work specified by the company and may be punished in accordance with the law if such action is illegal.

3.6. Arrange safe and accessible channels for employees and other persons to seek recommendation related to compliance to anti-corruption policy and to report clues about wrongdoing to ensure

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the informer will be suitably protected and appoint a person to check and follow up on all complaint issues.

Penalties

The company shall take disciplinary action against any individual, including directors, executives, and employees, who violates this Anti-Corruption Policy and UBIS group's guidelines, or engages in any act that supports, facilitates, or cooperates in corruption. Any executive or employee accused of such misconduct, upon investigation and confirmation of wrongdoing, shall be subject to disciplinary action in accordance with the company's work rules and regulations and may also be subject to legal penalties if the conduct constitutes an offense under applicable laws. In the case of directors accused of misconduct, upon investigation and confirmation of wrongdoing, they shall be subject to penalties as prescribed by applicable laws, including the Public Limited Companies Act. Directors, executives, and employees may not claim lack of knowledge of the Anti-Corruption Policy and Guidelines as a justification for non-compliance.

General .....*Terdsak Marrome*.....

(Terdsak Marrome)

Chairman of the Board of Directors