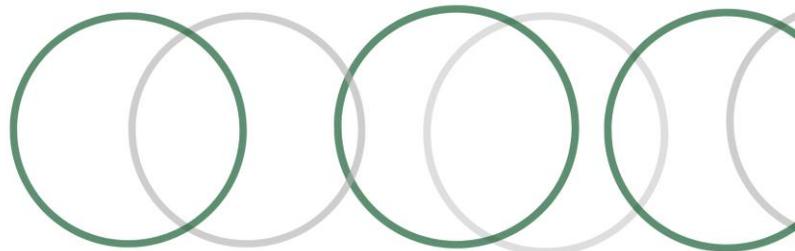


บริษัท ยูบิส (เอเชีย) จำกัด (มหาชน)
UBIS (ASIA) PUBLIC COMPANY LIMITED

ANTI-CORRUPTION POLICY

Rev. 2 Effective from: December 13, 2023



Anti-Corruption Policy

The company does not accept all kinds of corruption covering all business and items in all countries and all related units. Meanwhile, the company sets the operational steps for anti-corruption to comply with this policy and the company will review such operational steps regularly to correspond with the change of business law and maintain the reputation of the company, directors, management, and all staff have to adhere to this policy.

Definition according to anti-corruption policy

Corruption means the action to seek illegal benefits by duties or by legal to serve their benefits, friends and/or others by proposing, promising, requesting, demanding, giving or bribery, diverting into illegal acts directly and indirectly, making false document, taking company's assets for personal use, conflict of interest action.

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 ticket for funding or donation to political party, allowing staff to take a day off or to be company's representative to join political campaign.

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

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

Sponsorships means the 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 using sports for charity or exploiting charitable organizations to take advantage from the consideration of the government officials or relevant parties.

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

Hospitality means attending social events, culture, or sports watching with the 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.

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 from conflicts of interest arisen. This may result in distrust towards to person that how much he 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 in 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 which are trying to encourage state policies to benefit their organizations.

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.

The Company means UBIS (Asia) Public Company Limited

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

Board of Directors means the company's board of directors as certified in the company's articles.

Executives means manager or the first four top-ranking executives after the manager level as well as other 4th ranking equivalent and includes accounting or finance executives of department head level and up. This is under the announcement of the Securities and Exchange Commission.

Employees means permanent employees, daily-wage workers, temporary employees, and special contract employees.

Partner means suppliers, distributors, and service providers to the company.

Customer means purchasers of the company's products and consumers of the company's products.

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

Stakeholder means individuals or entities with a vested interest in a company or organization including board members, management, employees, shareholders, related parties, business partners, customers, and society.

Other Individuals/Entities individuals or legal entities that do not fall into the categories of directors, management, employees, business 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 director, management, and all staff 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, legally, not be used for corruption and comply with the regulation on donation for charity of the company.
 - 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 the company.
 - 2.4. Directors, Executives, Employees do not ask, request, and give any objects or benefits to the person who is responsible related to the company except such giving or obtaining is by local tradition or trade tradition with the value not exceeding that specified by the company and to comply with the regulation of giving or obtaining gifts and business entertainment.
 - 2.5. The company does not pay and obtain the fee of bribery in business operation directly or arising via persons on behalf of company, consultant, broker, contract party, partner, or intermediary under the company's control directly. In addition, employees must refrain from engaging in any activities that may lead to or imply that the company has paid or received a bribe in the form of fees for facilitation or commissions.
 - 2.6. The Executives and employees are obligated to fulfill their responsibilities in the best interests of the company and to exercise prudence to avoid any potential conflicts of interest.
 - 2.7. The company has a strict policy against making or accepting calls 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. Outside Commission for company's distributor/agent or consultant must be clearly specified in the official distributor/agency or consultant contract.
 - 2.9. The company does not hire or appoint individuals who currently holding government positions related to the government, except for those who have disengaged from government roles for a minimum of 2 years and seek employment as executives, managers, employees, or consultants within the company. Such individuals are required to undergo the same recruitment and selection procedures as non-government employees, ensuring equal treatment and opportunity.

Implementing anti-corruption policy into practice.

3.1. To communicate policy and operational procedure related to anti-corruption to director, management, staff, person on behalf of company, consultant, broker, contract party, partner, to take into practice via specified channels.

3.2. To 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. To arrange personnel recruitment process, promotion, training, operational assessment to reflect the determination of company against anti-corruption measure.

3.4. Do not demote, punish, or give adverse consequence to staff that refuses corruption even such action causes the company to lose its business opportunity.

3.5. The person who commits corruption is considered unethical to the company and will be punished in discipline 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. To arrange safe and accessible channels for staff and other persons to seek recommendation related to compliance to anti-corruption policy and to notify clues for the wrongdoing to ensure the informer will be suitable protected and prepare the person to check and follow-up all complaint issues.

Penalties

The Company will take disciplinary action against any person, including directors, executives and employees who violate the compliance with this Anti-Corruption Guidelines, including anyone who acknowledges suspected corruption but ignores whistleblowing policies, misconduct and corruption, or does not take appropriate action to deter or mitigate any damages a reality resulting in the corruption, which is penalty under the Company’s Work Rule, both disciplined and terminated under applicable laws. In this regard, the directors, executives, and employees could not be possible cite any dissemination of this manual as an excuse for failure to comply with this manual.

General *Terdsak Marrome*
(Terdsak Marrome)
Chairman of the Board of Director

