



Anti-Corruption Policy

P.S.P. Specialties Public Company Limited

Anti-Corruption Policy

PSP Specialties Public Company Limited (the “Company”) and its subsidiaries (the “Group”) realize the paramount of Anti-Corruption and are committed to conducting business under the Principles of Corporate Governance, Code of Conduct, and Corporate Compliance Policy alongside responsible social, environmental, stakeholder practices to conduct business with integrity, transparency, verifiability, accountability, and professionalism.

1. To make certain that the Company has a policy specifying appropriate responsibility, guidelines, and rules for its business operation to prevent all types of corruption in all of the Company’s activities and that the Company’s decisions and business operations involving the Company’s activities and that the Company’s decision and business operation involving with the risk of corruption have been thoroughly considered and conducted, the Company has arranged for the written Anti-corruption Policy to be clear guidelines for doing business and developing a sustainable organization.

Terms and Definitions

Corruption refers to any type of bribery, whether in the form of offering, promising to give, giving, agreeing to give, requesting, or accepting money, assets, or other benefits to or from a government official, a government agency, a private organization, or a responsible person, either directly or indirectly, so that such person acts or refrains from acting in the exercise of his or her duties in order to obtain or retain business or recommend a specific business to the company or obtain or retain other undue business advantages.

Charity refers to activity involving money donations that bring about no tangible return.

Charitable Public Benefit is any monetary spending on and for the benefit of a project, communal activity, society, or group of people, with or without any tangible return to the Group.

Political Contribution is any contribution to a political party on behalf of the Group, be it financial or otherwise, including lending, mainly to support its monetary need or political activity. Sponsorships, as opposed to in cash, is any non-monetary contribution, usually, by giving goods or services offered for free or at a discount, be it paying for anything on the board's behalf, advertising, promoting, or supporting a political party, buying tickets to a fund-raising event, or donating to an organization related or close to a political party, among others, except supporting the democratic process per legal stipulations.

Sponsorship means the giving of money for a 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 of the consideration of the government officials or relevant parties.

(The advantages from consideration are, for example, providing contracts, business opportunities, bidding, reducing or canceling fees, or giving, helping, or withdrawing rules to acquire a license, which is not accessible to government officials.)

Government Official is any serving government official as defined in the Anti-Corruption Act, including any government agent, representative, state person, enterprise employee, contractor, or any other person representing the following agencies:

- Ministries, bureaus, departments, or government agencies, e.g., customs, immigration offices, government agencies, and local authorities, among others.
- International organizations, e.g., the World Bank, and the International Monetary Fund (IMF), among others.
- Political parties, office holders, candidates (government and opposition), and local administrators.
- Regulatory authorities, e.g., The Securities and Exchange Commission (SEC), The Bank of Thailand, and The Stock Exchange of Thailand (SET), among others.
- State enterprises, companies, and other organizations owned or controlled by a state or government entity.

Company Business Agent is a person appointed by the Company or a company under the Group's control to act as a sales representative or an agent to handle business on behalf of the Company, its subsidiary, or the Group.

2. Anti-Corruption Policy

2.1 Directors, executives, and employees of the Group, including subcommittees members, are prohibited from requesting or accepting any form of bribery or corruption, directly or indirectly, for the benefit of any organization or business, either domestically or internationally, including any party related to the Group, or their family or family member, friend, or acquaintance.

2.2 The Company must regularly review the compliance with the Anti-Corruption Policy as well as business guidelines and rules to ensure they are in line with changes in business, rules, regulations, and laws. Any acts which support or involve corruption will be punished as stipulated by the Company.

3. Duties and Responsibilities

3.1 The Board of Directors has the duty and responsibility to determine and approve the Anti-Corruption Policies by establishing a system that supports efficient and effective anti-corruption to ensure that management recognizes its importance and implements it as a corporate culture.

3.2 The Audit and Corporate Governance Committee has the duty and responsibility to verify the company has adequate internal control and review operational business in accordance with the Anti-Corruption Policy, rules, and applicable law.

3.3 The Executive Committee and executives have the duty and responsibility to ensure that all employees and stakeholders comply with anti-corruption policy regulations, including reviewing the appropriateness of the system and measures to comply with the changes in the business and regulations and requirements of the law.

3.4 The Internal Audit Unit has a duty to audit and review the operation to assure it is conducted correctly and in line with the policy, guidelines, regulations, and applicable laws. The Internal Audit Department has to make sure the Company has a proper and adequate internal control system to manage potential corruption risks and report to the Audit and Corporate Governance Committee.

3.5 Directors, Executives, and Employees of the company, including subcommittee members, have to comply with an Anti-Corruption Policy by not to engage all types of corruption either directly or indirectly.

3.6 Business agents controlled by the Group also have a duty of Anti-Corruption compliance.

4. Scope and Guidelines

4.1 The Company defines directors, executives, and supervisors of the company, including subcommittee members, are required to perform their duties with caution to prevent all acts of corruption as follows:

- Giving and Receiving Bribes

Giving and receiving a bribe of all forms in exchange for business benefits, including authorizing others to act on their behalf, are forbidden.

- **Gifts, Hospitality, and Other Benefits**

Giving or receiving gifts, assets, or any benefits from customers, partners, or stakeholders shall comply with the y Code of Conduct.

- **Political Assistance**

The Company has a policy not to assist or support political parties, political groups, or politicians, either directly or indirectly.

- **Participation in Political Activities**

The Group operates the business with political neutrality in refraining from participating or favoring any political party, politician, or authority in particular or supporting one with Company funds or resources, directly or indirectly. Although employees are not prohibited from exercising personal political rights, be it voting or running for elections, among others, the Company does prohibit them from using the Company name or resource, or that of a Group member, for political activity or campaign purposes, or in any way that may defame the Group.

- **Receiving Donations, Charity, Public Benefits, and Giving or Receiving Financial Support**

The Group requires that accepting donations, charity, public interest, or contributions, must be conducted according to the following requirements:

1. Conduct with transparency and legality, not against good morals or creating damage to society.
2. Do not involve with bribing or lead to be claimed for bribing.
3. Follow the Company's review and approval processes as defined in the Company's guidelines and regulations.
4. Must be consulted with legal authority in writing on any ambiguity that may have legal implications. Matters of other importance may resort to the discretion of the Executive Committee.

- **Operations, Contacts, Negotiations, Biddings, and Other Interactions with Government or Private Entities**

Must be handled transparently and legally. Besides, the Directors, Executives, supervisor, and of the company must never offer or accept bribes at any operational stage.

- 4.2 The Company strives to create and maintain its organizational culture of zero-tolerance on corruption, whether it conducts with public or private sectors.
- 4.3 Directors, executives, and employees at every level should not neglect if they find any act involving corruption in the Company. They must report to their supervisors or responsible person and cooperate in the investigations. Moreover, whistleblowing or compliant channels for outsiders are arranged. or other Whistleblowing channels are provided for reporting clues or complaints from stakeholders.
- 4.4 Any actions taken in relation to whistleblowing or complaints of corruption shall comply with the criteria set forth in the Whistleblowing Policy.
- 4.5 The Company fairly treats and protects employees who refuse to be involved in corruption or inform the Company about corruption. The Company will not demote, penalize or give a negative impact on employees who refuse to be involved in corruption although they make the Company lose business opportunities.
- 4.6 The Directors and executives including sub-committee members must show their honesty and be good role models in following the Anti-Corruption Policy. Covers in the human resource management process ranging from recruiting, promotion, training, to evaluation. Supervisors at every level have to communicate with employees so they apply the policy in business activities under their responsibilities. Governance and Compliance and HR departments are responsible for disseminating relevant information and creating an understanding and knowledge covering the personnel management process, from recruitment to selection, promotion, training, and performance evaluation, as well as encouraging employees at all levels to attentively and continuously adhere to Anti-Corruption Policy as part of the corporate culture.
- 4.7 All actions in the Anti-Corruption Policy are in line with those stipulated in the Company's good Corporate Governance Policy, guidelines for business conduct, relevant regulations, and the work manual, as well as other guidelines which the Company may define later.
- 4.8 Fraud and corruption are considered violations of the Anti-Corruption Policy under the Code of Conduct, such person will be disciplinarily punished as stated in the Company's regulation. If such

an act is illegal, the wrongdoer may be legally penalized, whereby the Chief Executive Officer's decision is considered final.

5. Anti-Corruption Policy Dissemination

For corporate awareness across everyone in the organization, the Anti-Corruption Policy is:

- 5.1 Displayed in noticeable areas where everyone in the organization can read.
- 5.2 Acknowledged by all Group employees through provided training.
- 5.3 Publicized through Group communication channels, such as its website, the annual registration statement-annual report (form 56-1 One Report), among others.
- 5.4 Reviewed at least once a year.

This Anti-Corruption Policy is approved by the Board of Directors and is effective from the 19th of December 2023, onwards.