



นโยบายต่อต้านการทุจริตและคอร์รัปชัน

Anti-Corruption Policy

Kijcharoen Engineering Electric Public Company Limited

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History of Document Amendments

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00	20 February 2025	Initial Issue	Executive Committee (3/2022)
01	20 February 2026	Annual Review	Executive Committee (1/2026)

Definitions

“Company”	refers to Kijcharoen Engineering Electric Public Company Limited.
“Personnel”	refers to the company’s directors, managing directors, executives, employees at all levels, and all types of staff working in the capacity of company personnel.
“Management Team”	refers to the company’s board of directors and executives at the deputy board level.
“Fraud”	means any intentional act that is illegal, aimed at gaining benefits for oneself or others.
“Corruption”	<p>means giving, offering, promising, or agreeing to give a bribe, directly or indirectly, to officials, representatives, or agencies, whether public or private, to induce them to act or refrain from acting, or to obtain or retain any undue advantage.</p> <p>Corruption also includes receiving or soliciting bribes, directly or indirectly, from officials, representatives, or agencies, whether public or private, to act or refrain from acting, or to obtain or retain any undue advantage.</p> <p>However, giving and receiving in accordance with laws, regulations, announcements, rules, customs, or business practices is permitted.</p>
“Bribe”	means any benefit, whether monetary or non-monetary, intended to induce a person to act or refrain from acting, or to obtain or retain any undue advantage. This includes facilitation payments.
“Facilitation Payment”	means an informal payment made to officials, representatives, or agencies, whether public or private, to expedite or facilitate the performance of routine duties.

- “Donation”** means providing money or non-monetary items to an organization or entity for charitable purposes, public benefit, or to support society, communities, or people in need.
- “Sponsorship”** means providing money or non-monetary items to customers, business partners, joint ventures, or other individuals for business purposes, company reputation, or business relationships.
- “Political Support”** means providing support, monetary or non-monetary, to political parties, political groups, political authorities, or any political candidates. This includes lending or donating equipment, providing technology services free of charge, advertising, promotion, or encouraging personnel to participate in political activities on behalf of the company, to gain business advantages or benefits for the company or personally.
- “Gift”** means money or non-monetary items given as a gesture of goodwill or to build relationships on various occasions or important business opportunities, to commemorate the company or the occasion.
- “Entertainment”** means organizing activities or covering expenses related to business hospitality, travel, meals, beverages, and other related items, including business visits or study trips.
- “Government Employee”** means a person who is or was an official or advisor working in a state enterprise or government agency with a formal position or salary. This includes directors and subcommittee members of state enterprises and government agencies.
- “Agent or Business Intermediary”** means an entity, organization, or individual assigned or hired to act for the benefit of the company.

“Business Partner”

means joint ventures, partners, suppliers, customers, and other business-related parties.

Anti-Corruption Policy

Kijcharoen Engineering Electric Public Company Limited (the “Company”) is committed to conducting business with honesty, transparency, responsibility, and accountability, in accordance with good corporate governance principles.

The Company has established a written “Anti-Corruption and Anti-Bribery Policy” to ensure that all business operations with potential corruption or bribery risks are conducted with careful attention at every stage. The Company is determined to prevent and combat all forms of corruption and bribery, whether direct or indirect, based on the principle that **“corruption and bribery are unacceptable in both public and private sector transactions.”**

This Anti-Corruption and Anti-Bribery Policy apply to all levels of personnel, including the Board of Directors, Managing Director, executives, employees, and staff, who are required to comply with this policy as well as the Company’s Code of Business Conduct. All personnel must avoid involvement, directly or indirectly, in corruption or bribery for the benefit of the Company, themselves, their families, or acquaintances. This policy also extends to joint ventures, partners, subsidiaries, suppliers, and business agents or intermediaries, who are required to adhere to this policy in the same manner.

1. The Anti-Corruption and Anti-Bribery Policy include the following details:
 - 1.1 Personnel are required to comply with the following:
 - 1.1.1 Do not give, offer, promise, or commit to providing any bribes or facilitation payments, whether directly or indirectly, to officials, agents, or organizations in both the public and private sectors, including any related parties, to obtain reciprocal benefits or for the purpose of gaining advantages related to the Company’s business or personal gain.
 - 1.1.2 Do not accept or solicit bribes, facilitation payments, or any other benefits that can be quantified in monetary terms, whether directly or indirectly, from officials, agencies, agents, or organizations in both the public and private sectors, including any related parties, to gain advantages in business agreements, contracts, or for personal benefit.
 - 1.1.3 Do not provide political support.

- 1.1.4 Do not solicit donations, sponsorships, or gifts, except for gifts received in accordance with the Company's Anti-Corruption and Anti-Bribery guidelines.
- 1.1.5 When giving gifts, providing hospitality, making donations, or offering support (except as prohibited in 1.3), ensure that such actions are transparent, verifiable, have a clear purpose, and are conducted in accordance with applicable laws, regulations, announcements, rules, customs, or business practices, and within appropriate circumstances and limits.
- 1.2 Personnel are required to report any instances of corruption, bribery, or behavior that may potentially constitute corruption or bribery to the designated contacts through the Company's whistleblowing channels, which may include the Company website, email, or postal mail. Personnel must also cooperate fully in any investigation of such matters. If there is any doubt regarding compliance with the Anti-Corruption and Anti-Bribery Policy or its procedures, personnel may seek guidance from their supervisors via email.
- 1.3 The Company shall ensure fairness and provide protection to personnel who refuse to engage in corruption or bribery, individuals who report corruption or bribery related to the Company, or those who cooperate in investigations. No personnel shall face demotion, disciplinary action, or any negative consequences as a result of such actions. The Company will keep all information regarding complaints and investigation data confidential and will not disclose it to unauthorized parties, except as required by law.
- 1.4 Directors, managing directors, executives, employees, and staff who violate the Company's Anti-Corruption and Anti-Bribery Policy shall be subject to disciplinary actions, which may include warnings, written notices, suspension, termination, and/or penalties under applicable laws.
- 1.5 Business intermediaries and agents must strictly comply with the Company's Anti-Corruption and Anti-Bribery Policy and procedures.
- 1.6 The Company shall communicate and publicize its Anti-Corruption and Anti-Bribery Policy, procedures, and other related policies and practices to ensure

understanding among all personnel and stakeholders.

2. The Company has defined responsibilities regarding anti-corruption and anti-bribery as follows:

2.1 Board of Directors – Responsible for establishing a comprehensive anti-corruption and anti-bribery policy and overseeing the implementation of effective anti-corruption and anti-bribery practices.

2.2 Sustainability Committee – Responsibilities include:

2.2.1 Reviewing the anti-corruption and anti-bribery policy, providing constructive recommendations for updating and improving the policy to ensure it is current and practical, and presenting it to the Board of Directors.

2.2.2 Assessing corruption and bribery risks and related risk management measures, and reporting to the Board of Directors.

2.2.3 Monitoring the implementation of communication plans, training programs, and awareness-raising activities on anti-corruption and anti-bribery for company personnel.

2.3 Audit Committee – Responsible for overseeing and reviewing the company's internal control and internal audit systems to ensure compliance with the anti-corruption and anti-bribery policy and practices, and reporting the findings to the Board of Directors.

2.4 Management Committee – Responsibilities are as follows:

2.4.1 Establish and implement anti-corruption and anti-bribery practices.

2.4.2 Review the anti-corruption and anti-bribery policy, assess corruption and bribery risks, and evaluate related risk management measures; provide constructive recommendations for updating and improving the policy in a practical and up-to-date manner, and submit these to the Governance and Sustainability Committee.

2.4.3 Promote and support personnel to perform their duties in accordance with the anti-corruption and anti-bribery policy and practices by

ensuring that systems and work processes comply with good corporate governance principles and business ethics, and foster a corporate culture that integrates anti-corruption and anti-bribery values.

2.5 Anti-Corruption Task Force – Responsibilities are as follows:

- 2.5.1 Develop the anti-corruption and anti-bribery policy, reviewing it every 1 year to ensure it remains current, and submit any updates to the management committee.
- 2.5.2 Develop the anti-corruption and anti-bribery practices, reviewing them every 1 year to ensure they remain current, and submit any updates to the management committee.
- 2.5.3 Communicate and provide guidance to personnel regarding compliance with the anti-corruption and anti-bribery policy and practices, as well as other related policies and procedures.
- 2.5.4 Assess corruption and bribery risks, develop relevant risk management measures related to the company's business operations, review these annually, and submit any updates to the management committee.

2.6 The Internal Audit Department shall be responsible for auditing operations to ensure compliance with the Anti-Fraud and Anti-Corruption Policy and practices in accordance with the approved authority, rules and regulations, as well as relevant laws and regulations, and shall report the results to the Audit Committee.

This is hereby announced for acknowledgment and compliance by all concerned. This policy shall take effect on 20 February 2026.