



แนวปฏิบัติต่อต้านการทุจริตและคอร์รัปชัน
(Anti – corruption guideline)

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Definitions

“Company”	means Kijcharoen Engineering Electric Public Company Limited and its subsidiaries registered in Thailand under the control of Kijcharoen Engineering Electric Public Company Limited.
“Personnel”	means the company’s directors, CEO, executives, and employees at all levels who perform duties as personnel of the company.
“Management”	means the company’s directors and senior executives directly reporting to the board of directors.
“Fraud”	means any intentional act that is unlawful and undertaken to gain benefits for oneself or others.
“Corruption”	<p>means giving, offering, promising, or agreeing to provide a bribe, either directly or indirectly, to officials, agents, or representatives of both public and private entities to induce them to act or refrain from acting, or to obtain or retain any undue benefit.</p> <p>Corruption also includes receiving or soliciting a bribe, either directly or indirectly, from officials, agents, or representatives of both public and private entities to influence their actions or to obtain or retain any undue benefit.</p> <p>However, giving and receiving that is in compliance with laws, regulations, announcements, rules, traditions, or trade customs is permissible.</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 benefit. Bribes include facilitation payments.

“Facilitation Payment”	means unofficial payments made to officials, agents, or representatives of public or private entities to expedite processes, accelerate procedures, or facilitate routine duties.
“Donation”	means giving money or non-monetary benefits to organizations or entities for charitable purposes or public benefit, supporting society, communities, or those in need.
“Sponsorship”	means providing money or non-monetary benefits to customers, business partners, joint ventures, or other persons with the objective of supporting the company’s business, reputation, or business relationships.
“Political Contribution”	means providing support to political parties, political groups, persons with political power, or any political candidates, whether monetary or non-monetary. This includes lending or donating equipment, providing technology services free of charge, advertising or promotional support, and/or encouraging personnel to participate in political activities in the company’s name to gain a business advantage or any benefit related to the company’s work or personal gain.
“Gift”	means money or non-monetary items given as a gesture of goodwill to build relationships on various occasions, including important business occasions, to commemorate the company or the occasion.
“Hospitality”	means arranging activities or covering expenses related to accommodation, travel, meals, beverages, and other related items for business hospitality, site visits, or study tours.
“Government Employee”	means a person who is or has been an official or advisor working in a state enterprise or government agency with

a formal position or salary, including directors and subcommittee members of state enterprises and government agencies.

“Business Agent or Intermediary” means an organization, entity, or person appointed or contracted to act for the benefit of the company.

“Business Partner” means joint ventures, co-investors, business partners, customers, and other parties involved in business relationships.

Anti – corruption guideline

To ensure that the Board of Directors, management, employees, all company personnel, business partners, as well as agents and intermediaries, understand and are able to consistently implement the company’s Anti-Corruption and Anti-Bribery Policy, the company has established the following Anti-Corruption and Anti-Bribery Practices:

1. Giving or Receiving Bribes and Facilitation Payments

The company’s practices are as follows:

- 1.1 Personnel must not give, offer, promise, or commit to giving bribes or facilitation payments, whether directly or indirectly, to officials, agents, or any government or private sector entities, including related parties, in order to receive reciprocal benefits or to gain advantages related to the company’s business or personal benefits.
- 1.2 Personnel must not accept or solicit bribes, facilitation payments, or other benefits that can be valued in monetary terms, whether directly or indirectly, from officials, entities, or agents, whether in the public or private sector, including related parties, to secure advantages in business agreements, contracts, or personal gain.

2. Donations and Sponsorships

Reasonable and appropriate donations and sponsorships may be made for specific occasions, provided they are conducted transparently, can be verified, and aim to support society, promote public interest activities, or enhance the company’s reputation and image. To ensure that such donations and sponsorships are not used as a pretext for indirect bribery or corruption to gain or retain business contracts, government approvals, favorable tax or customs treatment, or other improper business advantages, the company has established the following practices in line with internal control procedures:

- 2.1 Donations and sponsorships must be made on behalf of the company and comply with laws, company policies, business ethics, and relevant company directives.
- 2.2 The amount of money, assets, or items donated or sponsored must be clearly stated, along with the purpose of the donation or sponsorship, the start and end dates of

the activity, and the specific names of individuals, entities, or organizations receiving the donation or sponsorship for the stated purpose.

- 2.3 Proper evidence of receipt must be obtained, such as a receipt, acknowledgment letter, news coverage, or photographs.
- 2.4 Donations and sponsorships must be approved by the authorized personnel according to the company's delegation of authority or regulations.

3. Receiving Donations and Sponsorships

The company's policy prohibits soliciting or accepting donations or sponsorships, whether in cash or in-kind, from business partners or any other individuals within public or private sector organizations, regardless of the purpose.

4. Political Support

The company's practices are as follows:

- 4.1 The company shall remain neutral and will not provide political support, either directly or indirectly, to any political party, political coalition, political authorities, politically affiliated individuals, or any political candidates.
- 4.2 Personnel have the right to participate in or support political activities freely on a personal basis, without using the company's resources or time.
- 4.3 Personnel are prohibited from using their position to solicit, pressure, or coerce subordinates or colleagues to support any political activities, directly or indirectly, for the company's benefit or personal gain.

5. Gifts and providing hospitality to the company's business partners is permissible, provided the following practices are observed:

- 5.1 They must comply with social customs, business etiquette, or common business practices, and must not violate the company's regulations, code of conduct, policies, and must be within the limits of the law.
- 5.2 They must be intended to maintain good relationships with business partners without expecting any improper service, return favor, or unfair commercial

advantage, assistance, or other benefits.

- 5.3 They must be conducted transparently, approved according to the company's regulations, recorded accurately, and supported by clear documentation.
- 5.4 They must not be conducted during interactions with government or private agencies for the purpose of obtaining business permissions, licenses, or competitive bidding.
- 5.5 Permissible gifts may include promotional items or items that enhance the company's image, such as calendars or diaries, as well as local community products, charitable items, or items for public benefit. Hospitality must be provided with expenses limited to what is necessary and appropriate for the occasion.

6. Receiving Gifts, Hospitality, and Trade Discounts

6.1 Guidelines for Receiving Gifts:

6.1.1 Personnel are generally expected to refrain from receiving gifts, except in the following permissible cases:

- (1) Gifts valued at no more than 3,000 THB, such as calendars or diaries used for promotional purposes by the organization.
- (2) Gifts received from a random drawing where recipients are not specifically targeted.
- (3) Souvenirs received when attending events or significant business occasions, as a memento of the company or the event.
- (4) Prizes received from competitions or contests.
- (5) Other customary occasions recognized by tradition.

6.1.2. If it is unavoidable to receive a gift, or if the gift exceeds 3,000 THB in value, it must be reported to the office management so that the gift can be reallocated as an employee reward or donated for charity or public benefit in the company's name.

Additionally:

- (1) Report to the Chief Executive Officer if the recipient is a direct subordinate of the CEO, or
- (2) Report to the departmental director if the recipient is at the manager level or other levels.

6.2 Guidelines for Receiving Hospitality:

- (1) Must comply with social customs, business etiquette, and common business practices, and must not violate the company's regulations, code of conduct, policies, and legal requirements.
- (2) Must aim to maintain good relationships with business partners, without offering improper services or returns in violation of the law or business ethics.
- (3) Must be conducted transparently, with documented evidence of invitations, and approved by a supervisor.
- (4) No hospitality should be solicited by personnel.

6.3 Guidelines for Receiving Trade Discounts or Promotional Items: Receiving trade discounts, whether in cash or other assets, or promotional items should occur strictly between company and company, under normal business conditions, with no intent to gain improper advantage for company business or personal benefit. Clear, verifiable documentation of the receipt must be maintained.

7. Human Resources

The qualifications and responsibilities of the company's directors, as well as the criteria for their selection, appointment, removal, and consideration of their remuneration, must comply with the company's Articles of Association and the principles of good corporate governance. The names of the board of directors, any sub-committees, and the annual remuneration of directors must be disclosed publicly through the company's official channels as required by law.

The qualifications of directors, executives, and employees, along with criteria for recruitment, employment, appointment, transfer, compensation, travel expenses, performance evaluation, grievance handling, and termination, must comply with the company's regulations on human resource management or other equivalent documents. Names of executives must also be publicly disclosed through the company's official channels as required by law.

8. Employment of Government Officials

The company may appoint or hire government officials as directors, chief executive officer, executives, employees, or other staff. The company recognizes that employing government officials could lead to the use of relationships or internal information to benefit the company, which constitutes a conflict of interest and improper exercise of duties within a government agency or state enterprise, potentially giving the company an unfair business advantage. Therefore, to prevent such situations, the employment of government officials must follow these practices:

- 8.1 The recruitment, appointment, and determination of compensation for individuals who are or were government employees must be conducted transparently and must not be intended to provide advantages related to the company's business or personal gain.
- 8.2 The work history of individuals being appointed to positions within the company must be reviewed to identify potential conflicts of interest.
- 8.3 The background of directors who are or were employed by state enterprises or government agencies must be publicly disclosed through the company's communication channels as required by law.
- 8.4 Personnel who are or were government employees must strictly comply with the company's conflict-of-interest prevention policies and practices, as well as relevant rules and regulations. Directors, executives, and employees must not participate in or receive information regarding matters that could create direct or indirect conflicts of interest.

9. Investment and Trade

The company's investment policy adheres to the principles of fair competition and conducts business in accordance with good corporate governance. The company establishes approval procedures for investments according to its authority and conducts investment, trade, and dealings with business partners in accordance with the code of conduct. The company does not have a policy of soliciting, offering, or granting financial or other benefits to any individual or organization to obtain business contracts, privileges, competitive advantages, or to influence the performance or omission of any act in violation of laws or ethical standards.

10. Procurement

The company ensures that the procurement process is transparent and fair to all parties. The department responsible for procurement must review the background of potential business partners before presenting procurement proposals for approval in accordance with the company's authority matrix. All actions must comply with the company's regulations on procurement and engagement of consultants, or other similar documents. Personnel with a vested interest in any business partner must not be involved in or have access to information that may cause a conflict of interest, either directly or indirectly, in accordance with the company's conflict of interest prevention policy. Additionally, the company communicates and provides training on its anti-corruption policies and practices to suppliers prior to entering into procurement contracts, ensuring that suppliers understand and commit to conducting business in line with the company's policies and code of conduct.

The company does not have any policy to accept, solicit, offer, or give financial or other benefits to suppliers or service providers in exchange for selection, contract award, or acceptance of goods or services.

11. Accounting and Finance

Practices for receiving or disbursing funds are as follows:

11.1 Receiving funds from customers, legal entities, or other parties

- (1) Receipt of funds must comply with the business contract. Evidence of receipt must be issued by the finance department, and all receipts must reconcile with the accounting records.
- (2) Personnel must not offer, give, accept, or solicit financial or other benefits from the payer in exchange for delaying payments, reducing amounts owed to the company, accelerating payments for personal gain, or for any other purpose that could cause loss or damage to the company.

11.2 Disbursing funds to creditors, legal entities, or other parties

- (1) All disbursement transactions must be verified for accuracy and recorded in accounts payable according to business contracts by the accounting department. Transactions must comply with accounting principles and relevant

laws. Any incorrect or inappropriate transactions must be reported to supervisors, and corrective measures must be taken in accordance with accounting principles and legal requirements.

- (2) All disbursement transactions must be approved by authorized personnel at each stage according to the company's authority matrix and must be supported by legally valid payment evidence.
- (3) Creditors or payees must be treated equally, and payments must be made according to reasonable business terms. No preferential treatment, bias, or discrimination is allowed.
- (4) Personnel must not offer, give, accept, or solicit financial or other benefits from creditors or payees in exchange for early or delayed payments, or for any other purpose that could cause loss or damage to the company.

12. Borrowing, Lending, and Incurring Obligations

The company has established that all procedures related to borrowing, lending, and incurring obligations between the company and any other party must comply with the company's authority matrix and the regulations of Kijcharoen Engineering Electric Public Company Limited regarding accounting, finance, budgeting, and other relevant company regulations. Any interest or financial benefits arising from such transactions must be appropriate and in accordance with the related-party transaction rules of the Stock Exchange of Thailand, as well as the company's regulations on accounting, finance, and budgeting, or equivalent documents.

The company has no policy to accept, solicit, give, or offer financial or other benefits to any person or entity in order to obtain a loan agreement, grant a loan, or create/terminate obligations in a manner that is unlawful or unethical.

13. Anti-Money Laundering

The company shall not accept, transfer, or convert assets, nor support any actions involving the transfer or conversion of assets related to offenses under the Anti-Money Laundering Act. This is to prevent any person from using the company as a channel or instrument to move, conceal, or disguise the source of illegally obtained assets.

14. Recordkeeping and Data Retention

The company has a policy to comply with applicable standards, principles, and laws related to reporting, accounting, and financial information. The company does not permit false, inaccurate, or manipulated records, nor shall there be off-the-books accounts used to support or conceal acts of bribery and corruption.

The company maintains a system for safeguarding and protecting information by defining individual access rights to electronic data and properly storing documents, records, and financial reports in a categorized manner. This system ensures effective, secure, and auditable data retention.

15. Communication, Training, and Disclosure

The company ensures continuous internal and external communication regarding its anti-bribery and anti-corruption policies and practices, including channels for reporting tips and related information. For personnel, communication is conducted through various channels, such as orientation for new board members and employees, employee training sessions or activities, meetings with the CEO (Communication Day), notices on bulletin boards, and the company intranet, to ensure that personnel understand and implement the policies seriously.

For business partners, the company communicates its anti-bribery and anti-corruption policies and practices at the start of the business relationship and subsequently through activities such as Supplier Day or other appropriate occasions. The company also encourages business partners to adopt these policies and practices as part of their own operations.

In addition, the company discloses its anti-bribery and anti-corruption policies and

practices to shareholders, other stakeholders, and the public through the company's public website and other published materials.

16. Risk Assessment

The company requires the assessment of potential risks arising from bribery and corruption, with a regular annual review of the related risk management measures. This ensures that the company's operations are conducted correctly, transparently, and with effective preventive measures and internal controls. The results of risk assessments and the corresponding risk management measures are reported to the authorized decision-makers. The Risk Assessment Department coordinates and provides guidance to various departments to ensure that the risk assessment process is effective and appropriate. It also consolidates and reports the outcomes of these risk assessments to the relevant committees.

17. Audit / Internal Control Process

The company has established a process to regularly assess the adequacy and appropriateness of its internal control system on an annual basis through external auditors. These auditors review various activities in accordance with the company's delegation of authority, relevant orders, regulations, and the company's anti-bribery and anti-corruption policies and procedures. In addition, accounting audits are conducted by certified auditors quarterly and annually, in compliance with requirements from the Securities and Exchange Commission, the Department of Business Development, and the Revenue Department.

Audit reporting procedures are as follows:

17.1 The Internal Audit Department reports audit findings and observations to the Audit Committee at least once per quarter.

17.2 In case of urgent issues, the Internal Audit Department must report directly to the Chairman of the Audit Committee immediately.

17.3 The Audit Committee is responsible for reporting audit results to the Board of Directors.

18. Monitoring and Review

The Company shall monitor and assess compliance with the Anti-Fraud and Anti-Corruption Policy and practices, and the internal auditor shall report the audit results to the Board of Directors at least once a year. The Company shall also review the Anti-Fraud and Anti-Corruption Policy and practices at least annually or at such intervals as deemed appropriate, in order to propose any revisions to the authorized persons for consideration. In the event that any misconduct is identified, the Company shall establish clear corrective actions and preventive measures.

19. Whistleblowing

The company has established whistleblowing practices to provide opportunities for employees, stakeholders, or external parties to report information to the company regarding behaviors that indicate corruption, fraud, employee misconduct, or suspicious activities related to money laundering, accounting, finance, as well as control and auditing matters. Detailed procedures are available in the Whistleblowing Policy and Practices.

20. Disciplinary Actions

Directors, executives, and employees who violate the company's Anti-Corruption and Anti-Bribery Practices shall be deemed to have committed a breach of the company's work regulations. They will be subject to disciplinary actions in accordance with company rules, which may include verbal warnings, written warnings, suspension, or termination of employment. If the violation constitutes a legal offense, legal proceedings will also be taken.

This policy shall become effective from 20 February 2026 onwards, and the Company shall review this policy at least once a year or whenever there are any significant changes.