

Anti-Corruption Policy

Meb Corporation Public Company Limited

Anti-Corruption Policy

Meb Corporation Public Company limited (“**the Company**”) recognizes the importance of anti-corruption and is committed to conducting business with integrity under a framework of good corporate governance. The Company adheres to the principles of transparency, fairness, ethics, and accountability, and strictly complies with applicable regulations, rules, and laws to ensure that neither the Company nor its personnel accept corruption. Accordingly, the Company has established a written Anti-Corruption Policy to prevent corruption in all business activities, both domestically and internationally, and to ensure that any business decision or action with potential corruption risks is carefully reviewed and conducted in accordance with this policy. This policy serves as a clear guideline for business conduct and supports the development of a sustainable organization.

1. Definitions

“Corruption” means the abuse of power or authority to gain improper benefits, including offering or accepting bribes in any form — whether by proposal, contract, promise, solicitation, giving, or receiving money, assets, or other improper benefits — directed at government officials, state agencies, private entities, or responsible persons, either directly or indirectly, to induce them to act or omit an act, or to obtain or maintain improper business benefits.

“Charity” means activities involving expenditure of funds without tangible returns.

“Public Benefit Donations” means expenditure on projects or activities intended to benefit the community, society, or a group of people, where the Company may not receive tangible returns.

“Political Contributions” means support provided in the name of the Company, whether financial or in other forms, to support political activities. Financial support may include loans, while other forms of support (**in-kind**) may include provision of goods or services, advertising or promotional support to a political party, purchase of tickets for fundraising events, or donations to organizations closely associated with political parties. This excludes support provided in accordance with legally permissible democratic processes.

“Sponsorships” means payments made for services or benefits that are difficult to measure or track, which may be linked to bribery. For example, sponsorships may be used as a front, through charitable sports events or organizations, to gain advantage in the consideration of government officials or relevant persons. Such advantages may include awarding contracts, business or bidding opportunities, reducing or waiving fees, providing assistance or exemptions from regulatory requirements that are not in accordance with normal government decision-making processes, waiving or reducing legal requirements, or facilitating access to government officials.

“Government Official” refers to a “government official” as defined under the laws governing the prevention and suppression of corruption, and also includes civil servants, officers, employees of state enterprises, contractors, agents, or any other persons acting on behalf of the following entities:

- Ministries, bureaus, departments, or government agencies (e.g., the Customs Department, Immigration Bureau, etc.)
- International organizations (e.g., the World Bank, International Monetary Fund, etc.)
- Political parties, political office holders, or election candidates (both from government and opposition parties), and local government administrators
- Regulatory bodies (e.g., the Securities and Exchange Commission, the Bank of Thailand, the Stock Exchange of Thailand, etc.)
- State enterprises, or any companies or organizations owned or controlled by the state or government agencies

2. Anti-Corruption Policy

- 2.1 Directors, executives, and employees at all levels of the Company must not solicit, commit, offer, give, receive, or accept any form of corruption, either directly or indirectly, whether for the benefit of the organization, themselves, their families, friends, acquaintances, or for business advantage. This prohibition applies to both domestic and international business operations, as well as to all entities related to the Company and its subsidiaries.
- 2.2 All business operations and procurement activities must be conducted with transparency, honesty, and in full compliance with applicable laws and regulations.
- 2.3 The Company shall establish a regular review process to ensure compliance with this Anti-Corruption Policy, as well as periodically assess and revise related practices and operational requirements to align with business changes, regulations, and legal provisions. Any violation, participation in, support for, or cooperation with corrupt activities shall be subject to disciplinary action in accordance with the Company's regulations.

3. Duties and Responsibilities

- 3.1 The Board of Directors is responsible for establishing and approving the Anti-Corruption Policy, as well as ensuring the implementation of an effective anti-corruption system. The Board shall promote awareness of the importance of anti-corruption practices among all levels of personnel, fostering a culture of integrity within the organization. The Board shall also provide guidance and monitor compliance with the Anti-Corruption Policy.
- 3.2 The Audit Committee is responsible for reviewing the adequacy of the Company's accounting system, financial reporting, internal control, and risk management systems, as well as ensuring

that operations comply with the Anti-Corruption Policy, relevant requirements, and applicable laws and regulations.

- 3.3 Management is responsible for implementing the Anti-Corruption Policy by establishing systems that promote, support, supervise, and communicate anti-corruption measures to employees, ensuring that all employees and relevant parties comply with the policy. Management must also periodically review and improve systems and measures to align with changes in the business environment, company regulations, and legal requirements.
- 3.4 The Internal Audit Department is responsible for auditing and monitoring operational performance to ensure compliance with policies, practices, procedures, and applicable laws. It must ensure that appropriate and sufficient internal controls are in place to prevent potential corruption risks and conduct corruption-related risk assessments, reporting findings to the Audit Committee.
- 3.5 Directors, executives, and employees at all levels must strictly comply with the Anti-Corruption Policy and refrain from engaging in any form of corruption, whether directly or indirectly.

4. Scope and Guidelines

- 4.1 The Company requires that all directors, executives, and employees at every level perform their duties with due care to prevent any form of corruption, as follows

- **Giving and Receiving Bribes**

It is strictly prohibited to offer or accept bribes in any form in exchange for business benefits. Employees must also not assign others to offer or accept bribes on their behalf.

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

The giving or receiving of gifts, entertainment, or other benefits to or from customers, business partners, government officials, or any stakeholders of the Company must comply with Company regulations, be conducted with transparency, and be verifiable at all times.

- **Political Contributions**

The Company, including its directors, executives, and employees, must conduct business in a politically neutral manner. They shall not support politicians, provide financial or material contributions to political parties, political groups, persons holding political office, or candidates at the local, regional, or national levels. If any director, executive, or employee participates in political activities as part of their personal rights and freedoms, they must not claim to represent the Company or its

subsidiaries, nor use the Company's property, equipment, or resources for political purposes.

- **Donations, Charitable Contributions, Public Benefit Donations, and Sponsorships**

The Company establishes the following rules governing the acceptance and provision of donations, charitable contributions, public benefit donations, and sponsorships:

- (1) Must be conducted transparently, legally, ethically, and without causing harm to society or the public interest.
- (2) Must not be related to or used as a means of bribery.
- (3) Must follow the Company's due diligence and approval procedures for charitable contributions, public benefit donations, or sponsorships.
- (4) In case of doubt about whether an action may violate this guideline, written consultation should be sought from the Legal Department. For matters of greater importance, the Management shall make the final decision.

4.2 directors, executives, and employees at every level must not ignore or disregard any act that may constitute corruption related to the Company or its personnel. They are required to promptly report the matter to the responsible authority and fully cooperate in any investigation or fact-finding process.

4.3 The Company shall establish channels for whistleblowing and complaint submission accessible to both internal and external parties. The Company shall ensure fair treatment and protection for employees who refuse to engage in corruption or report corruption-related activities involving the Company or its personnel. Such employees shall not face demotion, punishment, or any form of retaliation, even if their actions may result in a loss of business opportunity for the Company.

4.4 The Company shall arrange training and orientation programs for directors, executives, and employees regarding the anti-corruption policy to ensure proper understanding and practical implementation.

4.5 Directors and executives of the Company and its subsidiaries must demonstrate honesty and integrity, serving as role models in complying with the anti-corruption policy. The Human Resources Department shall be responsible for promoting awareness, building understanding, and encouraging all employees to adopt and uphold the anti-corruption policy consistently and continuously, until it becomes part of the organizational culture.

- 4.6 The Anti-Corruption policy shall extend to all human resource management processes, including recruitment, selection, promotion, training, and performance evaluation. Supervisors at every level shall communicate, guide, and ensure that employees under their supervision understand and comply with the policy effectively.
- 4.7 The Company shall operate in accordance with this Anti-Corruption Policy, all relevant laws, and the Company's regulations, operational manuals, and other future guidelines that may be established to support its implementation.
- 4.8 The Company shall review this Anti-Corruption Policy at least once a year to ensure its continued relevance and effectiveness. Any person who becomes aware of corruption involving the Company may report it through the whistleblowing channels specified under the Company's Whistleblowing Policy. The Company shall also provide protection measures for whistleblowers in accordance with the anti-corruption whistleblowing protection framework.

Those who witness corruption or fraudulent acts related to the organization can report such incidents through the channels specified by the company under the Whistleblowing Policy. The company shall establish measures to protect whistleblowers of corruption or fraudulent acts.

5. Anti-Corruption Policy Disclosure

To ensure that everyone in the organization is aware of the Anti-Corruption Policy, the Company shall proceed as follows

- 5.1 The Company shall post the Anti-Corruption Policy in a prominent place where all personnel can easily read it.
- 5.2 The Company shall publish the Anti-Corruption Policy through the Company's communication channels, such as the Company's website, the annual report, and the annual information disclosure form (Form 56-1).

This Anti-Corruption policy shall be effective from 18 April 2022, onward.