



Anti-Corruption Policy

Reviewed on 13 January 2026

1. Objectives

The Company has established this Anti-Corruption Policy (the “**Policy**”) with the objective of preventing any actions related to fraud and corruption in any form by the directors, executives, and employees of the Company, whether directly or indirectly, for their own benefit, their families, friends, or acquaintances, whether in the capacity of bribe recipients, providers, or offerors, in form of monetary or non-monetary, to government agencies or private entities whom the Company do business with. The Company is committed to strictly adhering to this Policy. Furthermore, this Policy shall apply to all business activities conducted by the Company’s subsidiaries and joint ventures under the Company’s control.

2. Definitions

Company	means G-Able Public Company Limited.
Company Personnel	means the Company’s directors, executives, and employees.
Fraud and Corruption	means any actions to pursue unlawful exploitation for the Company’s, personal or other interests, including bribery, whether in a manner of offering, promising, soliciting, demanding, giving to, or accepting assets or any other benefits from government agencies or any other persons involving in the Company’s businesses, whether directly or indirectly, to induce such persons to act, refrain from acting, or abuse of power in their positions in order to obtain or retain improper business benefits, unless permitted by local laws, regulations, customary practices, or trade ethics.
Political Contributions	means providing support, whether financially or in other forms, to political parties, politicians, political candidates, relevant political persons or political activities, such as offering goods or services, advertising or promoting a political party, purchasing tickets for fundraising events, or making donations to organizations closely associated with political parties.
Charitable Contributions	means donating money, goods or any other items that can be calculated in monetary terms with charitable purposes or for public benefit of society without expectation of return.
Hospitality and Entertainment	means the management or expenses of the Company’s activities for the benefit of business or to foster good relationships. In certain cases, it is an act of social etiquette, directly related to business operations, or customary practices. Hospitality and entertainment expenses may include accommodation, transportation costs, food and beverage costs, or other expenses for business meetings, site visits, business trips, business knowledge sessions, sport activities, or recreational activities.

Sponsorships	means money, items, or any other form of compensation convertible to monetary value that the Company provides to or receives from any persons, both in the public and private sectors, including but not limited to, customers, suppliers, or those involving in the Company's businesses, with the objective of supporting the Company's business operations, building business creditability, promoting the corporate logo, brand, image, or reputation of the Company, or strengthening business relationships.
Gifts	means valuable items that the Company receives from or provides to any persons involving in the Company's businesses to build relationships in an acceptable manner with appropriate value and in accordance with traditions and applicable laws.
Conflict of Interest	means any actions that involve personal interests or those of related individuals to the extent that they affect or influence decision-making or performance of duties, which may hinder or impact the Company's interests whether directly or indirectly.
Facilitation Payment	means a certain amount of money paid to government officers unofficially, providing assurance that the government officers will follow due processes or to encourage them to act more swiftly, where such processes do not require the discretion of the government officers and are actions that fall within the duties of those government officers, as well as being rights that the legal entities are entitled to by law.
Government Officers / Government Employees	means a government officer, employee, worker, group of persons, or individual working in government agencies, state enterprises, public organizations, public entities, administrative agencies, dispute tribunal, committee or person with legal authority to issue regulations, orders, or decisions that affect individuals.

3. Roles and Responsibilities

- (1) The Board of Directors is responsible for establishing policies and overseeing a system that efficiently and effectively supports anti-corruption and anti-fraud measures. This aims to ensure that the management is aware of and prioritizes the fight against fraud and corruption, fostering it to become a corporate culture.
- (2) The Audit Committee is responsible for reviewing the Company's compliance with the Policy and related guidelines, as well as reviewing financial reporting system, internal controls and internal audit functions. This is to ensure that operating activities of various departments are carried out effectively and in compliance with laws, regulations and ethical standards.
- (3) The Executive Committee is responsible for overseeing the implementation of the Policy across the entire organization.

- (4) The Chief Executive Officer and executives at all levels are responsible for establishing and promoting systems that support the Policy (which includes serving as role models for integrity, ethics, and business conduct), communicating and creating understanding among employees and stakeholders across all departments regarding the implementation of this Policy, and reviewing the appropriateness of systems and measures to ensure alignment with changes in business, regulations, rules, and relevant laws.
- (5) The Internal Audit Department is responsible for reviewing the operational processes to ensure correction, and compliance with policies, practices, operational regulations, and the approval authority, as well as the relevant laws. This is to ensure that the Company has an adequate and sufficient internal control system. The department reports directly to the Audit Committee.
- (6) The Risk Management Department or the Risk Management Working Group is responsible for advising relevant departments to assess potential fraud and corruption risks related to the Company's business operations and determining appropriate measures to reduce the risks that may arise.
- (7) The Company Personnel are obliged to adhere to the Policy, including the Company's regulations and relevant laws in a strict and disciplined manner.

4. Scope and Guidelines

- (1) The Company Personnel are prohibited from demanding, engaging in, or accepting fraud and corruption for the benefit of the Company, themselves, their families, friends, acquaintances, and related persons.
- (2) The Company Personnel shall adhere to the Policy, refraining from involvement in any form of fraud and corruption, whether directly or indirectly.
- (3) The Company Personnel who violate or fail to adhere to the Policy will be subject to disciplinary action in accordance with the Company's regulations. At the same time, he/she may be imposed by law, if such fraud and corruption are against the law.
- (4) The Company Personnel shall not overlook or ignore any observed or suspected acts of fraud and corruption. The Company Personnel are required to report such incidents to the Company through the designated reporting channels and cooperate in investigating the facts as specified in the Company's regulations.
- (5) The Company will ensure fairness and provide protection, recommendation, or commendation to the Company Personnel who refuse to engage in fraud and corruption or report incidents related to fraud and corruption involving the Company. Additionally, the Company has a policy not to demote, penalize, or have negative consequences for the Company Personnel who refuse to engage in fraud and corruption, even if such actions result in the Company losing business opportunities. The Company also applies protective measures for complainants or those who cooperate in reporting and disclosing incidents of fraud and corruption as specified by the Company. Complaints and the names of complainants will be kept confidential.

- (6) The Company establishes operational manuals and work instructions with sufficient details to ensure compliance with policies and prevention of fraud and corruption in business operations.
- (7) The Company has a human resource management process that reflects its commitment to the Policy and anti-corruption measures, ensuring the availability of resources and skilled personnel suitable for implementing the Policy.
- (8) The Company is committed to creating and maintaining a corporate culture that firmly refuse fraud and corruption, both in transactions with the public and private sectors.
- (9) The Company encourages its subsidiaries and affiliates under its control to comply with this Policy. Additionally, for suppliers, who are considered as persons involving in the Company's businesses, the Company has established a supplier code of conduct, requiring its suppliers to conduct business with honesty and integrity, including refraining from any form of direct or indirect fraud and corruption. The Company also reserves the right to monitor compliance with the supplier code of conduct.

In this regard, the Company requires its directors, executives, and all employees to work with prudence and caution against any form of the Fraud and Corruption, as follows:

Political Contributions

The Company has a policy of not providing the Political Contributions, whether directly or indirectly, or engaging in activities that endorse any political party or political group. The Company has practices related to the Political Contributions as follows.

- (1) The Company has a policy of not providing the Political Contributions, endorsing political parties or politicians, and supporting, whether financially or non-financially, political parties, politicians, political candidates, relevant political persons or political activities, either directly or indirectly.
- (2) The Company Personnel have the freedom to participate in any political activities as allowed by the Constitution. However, the Company Personnel shall not claim that they are doing so as the Company's staff or not use the Company's resources, equipment, or assets for any political activities or actions that could create the perception that the Company is involved or supports such activities.

Charitable Contributions

The Company engages in the Charitable Contributions as a part of its corporate social responsibility activities. As such, to ensure that the Charitable Contributions are conducted in transparent manner, are not used as channels for fraud and corruption and are not made with expectation of any return benefit, the Company has the following practices related to the Charitable Contributions.

- (1) The Charitable Contributions shall be made in the Company's name to certified, or reliable and inspectable foundations, non-profit organizations, temples, schools, hospitals or other organizations.

- (2) The Company Personnel wishing the Company to participate in the Charitable Contributions shall submit the Charitable Contributions request form with all required information being filled and supporting documents to the authorized person within the Company for approval. Additionally, all relevant evidence documentation, including receipts, must be submitted to the relevant department for thorough verification based upon the Company's relevant regulations and procedures.
- (3) The Company does not have a policy to accept the Charitable Contributions from any person except when acting as an intermediary for public charity or the public interest purposes, such as providing relief to those in distress or victims of various disasters.
- (4) The Company implements tracking and auditing procedures to ensure that the Charitable Contributions is not used for fraud and corruption, forming an integral part of the oversight and internal auditing processes.

Sponsorships

The Sponsorships is a mean of promoting the Company. Therefore, the Company has implemented controls to ensure that the Sponsorships are conducted in transparent manner, are not used as a channel for fraud and corruption and are not made with expectation of any return benefit. Followings are practices related to the Sponsorships.

- (1) The Sponsorships shall be provided or accepted in the Company's name. In providing any Sponsorships, in addition to the purpose of supporting the Company's business operations, corporate logo, brand, image, or reputation, the objectives of project or activity must be transparent and lawful.
- (2) The Company Personnel wishing the Company to provide or accept the Sponsorships shall submit the Sponsorships request form with all required information being filled and supporting documents to the authorized person within the Company for approval. Additionally, all relevant evidence documentation, including receipts, must be submitted to the relevant department for thorough verification based upon the Company's relevant regulations and procedures.
- (3) The Company implements tracking and auditing procedures to ensure that the providing and accepting Sponsorships are not used for fraud and corruption, forming an integral part of the oversight and internal auditing processes.

Gifts, Hospitality and Entertainment

The Company has a policy to prohibit the Company Personnel from demanding, accepting from, giving to, or promising to give any assets, valuable items or other benefits to customers, suppliers, or persons involving in the Company's businesses to induce them to perform or refrain from any actions. This is except for cases of (i) normal customary practices where gifts are received and given, and (ii) the provision or acceptance of the Hospitality and Entertainment in course of business operations or traditional customs. The Company determined practices regarding the giving and acceptance of the Gifts, the Hospitality and Entertainment as follows.

- (1) The Company Personnel are prohibited from demanding, accepting from, giving to, or promising to give any assets, valuable items or other benefits (including the Gifts, the Hospitality and Entertainment) from customers, suppliers, or persons involving in the Company's businesses, whether for personal gain or for others. Such actions may result in biased decision-making, create unfair advantages, or cause discomfort, leading to conflicts of interest.
- (2) Gifts Giving and Acceptance
 - (2.1) Giving and acceptance of the Gifts in line with customary practices, appropriate to occasions and circumstances, or during traditional festivals such as new year celebration or other special occasions, are permissible. However, the Gifts that are given or received must be reasonable in nature, value, and/or cost, and subject to the Company's regulations and procedures.
 - (2.2) Giving of the Gifts must be made in the Company's name. Giving of the Gifts shall not create any undue advantages through inappropriate or implicit actions, explicit exchanges, or hidden exchanges to obtain assistance or compensation benefits, leading to unwarranted concessions in inappropriate business agreements or influence business decision-making. In this respect, giving of the Gifts is subject to the receiver's rules and regulations.
- (3) Hospitality and Entertainment
 - (3.1) Expenditures for the Hospitality and Entertainment, in accordance with customary practices, under careful consideration and in a transparent and reasonable manner, are permissible. These expenditures shall not be made with the intention of gaining business advantages. Additionally, any claims for the Hospitality and Entertainment must clearly state the objectives with the verifiable evidence based upon the Company's relevant regulations and procedures.
 - (3.2) Acceptance of the Hospitality and Entertainment is permissible if deemed appropriate and in line with customary practices. Such actions must be based upon the Company's relevant regulations and procedures.

Facilitation Payments

The Company does not have a policy of the Facilitation Payments for any form of convenience, both directly and indirectly. It will not engage in or accept any actions in exchange for facilitating business operations. The Company has the following practices.

- (1) The Company Personnel are prohibited from giving, requesting, or promising that facilitation payment, property or any other benefits will be given to governmental officers in order to induce to act, not act, delay action, which affect the Company's business operations.
- (2) Business dealings with government sectors must be transparent and strictly comply with relevant laws.

Employment of Government Officers / Government Employees

Employment of the Government Officers / Government Employees poses an increased risk of fraud and corruption due to conflicts of interest, as it may lead to overlapping benefits that could compromise the impartiality of the government officers in performing their duties for the maximum benefit of the state. Therefore, to prevent such situations, the Company has a policy of not employing the Government Officers / Government Employees who still hold position as employees. With respect to the employment of the former Government Officers / Government Employees, the Company shall proceed in a transparent manner with caution, and in accordance with the Company's regulations and procedures (including the Company's employment rules). Cooling-off period as required by law shall also be considered.

Conflict of Interest

The Company Personnel shall perform their duties in a responsible manner with loyalty and honesty, protecting the Company's interest, avoiding the appearance of any conflict of interest, as well as complying with the Company's prevention of conflict of interests and declaration of interests policy.

5. Complaints and Whistleblowing

The Company has established secure channels for reporting complaints or whistleblowing on illegal activities, breaches of code of conduct, possible acts of fraud and corruption, improper behaviours or wrongdoings by the Company Personnel or other stakeholders, as well as any violations of the Policy. The Company implements mechanisms to protect whistleblowers, including maintaining confidentiality and allowing anonymity, as well as ensuring that all complaints are kept strictly confidential. This is to build trust and confidence among whistleblowers and stakeholders in participating in safeguarding the Company's interests. In this regard, it is in accordance with the Company's whistleblowing or complaint policy.

6. Monitoring and Review of the Policy

The Company requires regular monitoring and review process for the Policy and anti-corruption measures, including practices at least once a year. All organizational units within the Company, according to its organizational structure, shares the responsibility for conducting thorough and appropriate reviews to current circumstances. The results of review are to be presented to the Board of Directors for consideration and approval.

7. Training and Communications

The Company has a policy of conducting training and communication to provide accurate knowledge and understanding of its Policy, anti-corruption measures and operational guidelines to the Company Personnel, enabling them to appropriately apply them in their work. This includes the Company's adherence to Thai anti-corruption laws.

Additionally, the Company will communicate, promote and disclose its Policy, whistleblowing or complaint policy and other related information to all stakeholders for acknowledgment through the Company's communication channels, internal office noticeboards, the Company's website, or other appropriate channels to ensure that the Company is an organization that supports anti-corruption, conducts its business operations transparently, and can be audited.

8. Management of Corruption Risks

The Company implements a risk management system for fraud and corruption. This involves risk assessments, risk prioritization, and establishment of appropriate measures. Additionally, the Company consistently monitors the progress of the implemented measures to maintain risks in an acceptable level.

9. Internal Control and Audit on Compliance with the Policy

- (1) The Company implements internal control and audit systems to ensure the effectiveness and efficiency, covering processes of financial record-keeping, accounting, human resource management processes, procurement processes, and other processes related to the Company's operations.
- (2) The Company has established an independent internal audit department to assess the adequacy of internal control systems, risk management systems, business supervisory processes, and key operational activities as well as key working systems of the Company, such as procurement and commercial operations. This assessment focuses on adequacy, appropriateness, and efficiency in line with the defined objectives, as well as full compliance with the applicable legal requirements, rules and regulations, and the Policy.