

# **Anti-Fraud and Anti-Corruption Policy**

Business Alignment Public company Limited

## Anti-Fraud and Anti-Corruption Policy

Business Alignment Public Company Limited (the “Company”) operates its business in strict adherence to the principles of Good Corporate Governance and Code of Business Conduct. Directors, Executives, and employees, including subsidiaries, associated companies, other companies under the control of the Company, and business agents if any, are prohibited from participating in or accepting any form of bribery and corruption for direct or indirect benefits for themselves or related parties. This applies whether acting as a recipient, giver, or offeror of bribes, whether in the form of money or other benefits, to government officials or any other persons in both the public and private sectors.

The Company is a distributor of medical equipment imported from overseas, primarily from the United States. The United States enforces the Foreign Corrupt Practices Act (FCPA), which holds U.S. entities accountable for business dealings with foreign companies involving the bribery of government officials. The U.S. Department of Justice (DOJ) defines “U.S. entities” to include directors, officers, employees, agents, distributors, and shareholders acting on behalf of U.S. companies. Accordingly, the Company has established a written policy against corruption that is consistent with and complies with Thai laws regarding the prevention of corruption. This policy serves as a framework and guideline for the Board of Directors, Executives, and employees to follow strictly.

### Definitions

- Fraud refers to any action taken to seek benefits that are not legally due for oneself or others. This includes various acts such as embezzlement, racketeering, and corruption.
  1. Asset misappropriation refers to the possession of property belonging to others or of which others are owners, and then dishonestly misappropriating such property for oneself or a third party.
  2. Embezzlement refers to the act of deceiving others by presenting false statements or concealing facts that should be disclosed in good faith, resulting in the acquisition of property or causing the person deceived or a third party to execute, withdraw, or destroy any legal documents of right.
  3. Corruption refers to solicitation, receipt, or acceptance of, as well as the giving, requesting, or offering of a promise to provide property or any other benefits to government officials, personnel of private agencies, or private agencies. This is done so that the individual or agency uses their existing power to perform or refrain from performing an act, or to accelerate or delay an act in violation of their duties. Such actions are intended to acquire improper benefits for oneself or others, or to maintain business or inappropriate advantages.
- The Company refers to Business Alignment Public Company Limited and subsidiary (if any)

- Subsidiary and associated company refers to companies as defined under the Securities and Exchange Act, as well as other relevant notifications or orders.
- Executive refers to person holding positions at the level of Chief Officer or higher within the Company.
- Political contribution refers to support provided in both monetary and non-monetary forms to political parties, party representatives, politicians, or candidates for political election. Non-monetary support includes the lending or donation of materials and equipment without service charges.
- Donation refers to the donation of money, items, or anything else with a calculable monetary value to public organizations such as foundations, temples, schools, hospitals, or organizations for social benefit without expecting anything in return. The objective must be for genuine social benefit.
- Sponsorship refers to subsidies, aid, or contributions paid, as well as items or other returns provided to individuals or agencies in both the public and private sectors, including charitable organizations. This must be done reasonably with the objective of supporting business operations, promoting the brand, or enhancing the reputation of the Company, which is beneficial for building commercial credibility and strengthening business relationships.
- Giving and receiving gifts, souvenirs, property, or other benefits refers to the giving or receiving of items with monetary or sentimental value, whether in monetary or non-monetary form, given on important occasions according to tradition or culture as a gesture of hospitality. This includes items given as awards, honors, or tokens of appreciation, as well as items given according to social etiquette or normal customs such as New Year gifts, birthday gifts, or gifts on the occasion of a new appointment.
- Customary traditions refer to festivals or significant days where gifts may be exchanged. This also includes occasions for expressing congratulations, gratitude, welcome, condolences, or providing assistance according to social etiquette.
- Entertainment refers to the provision of food and beverages, including the organization of events or recreational activities for relaxation such as festivities or sports events. These are organized to host external individuals or agencies, such as customers, business partners, or consultants, to build good relationships or follow customary traditions. This does not include seminars, knowledge sharing activities, public relations, sales promotions, relationship activities for customer or partner groups, or rewards specified in sales promotion activities.
- Hospitality refers to the hosting and assistance provided to visitors with friendliness and attentiveness.
- Bribery refers to money, items, gifts, rewards, or any other form of compensation provided to induce a person to make a decision, perform an action, or refrain from performing an action. It also includes

payments made to obtain personal benefit or to ensure a task is completed according to one's desires in a dishonest or illegal manner, or in violation of the Code of Business Conduct.

- Facilitation payment refers to small, unofficial expenses paid to government officials solely to ensure that the officials proceed with a process or to encourage a faster process. Such processes must not require the discretion of the government official and must be within the legal scope of the official duties of that person. These are rights that the Company is already entitled to by law, such as applying for permits, requesting certificates, or receiving public services.
- Government officials refer to individuals who are or were government employees, politicians, or consultants to government agencies and have joined a private company. Such individuals may use their relationships or internal information to benefit the private company or cause a conflict of interest in the performance of duties by government agencies or business regulatory organizations. The result of such actions is aimed at creating an unfair business advantage or influencing policies to benefit the private company for which the former government employee works.
- Government employees refer to civil servants or local employees with a permanent position or salary, personnel in government agencies or state enterprises, local executives, deputy local executives, assistant local executives, and members of local councils of local government organizations as prescribed by law. This also includes directors, subcommittees, employees of government departments, government agencies, or state enterprises, and individuals or groups of persons empowered by law to exercise administrative power established within the civil service system, state enterprises, or other state businesses, as well as political office holders and holders of positions in independent organizations.
- Conflict of Interest refers to any action that causes a person to have an interest or a conflict with the interests of the Company. This may arise from dealings with business associates, or from using opportunities or information gained through their role as an employee for personal gain, or engaging in a business that competes with the Company, or working in other roles outside of the Company that impact on their official duties.

### **Scope of the Policy**

This policy applies to directors, executives, employees at all levels, and other related persons, all of whom must strictly comply with the policy against corruption and any additional guidelines if any, without exception. Furthermore, directors, executives, and employees at all levels, including subsidiaries, associated companies, other companies under the control of the Company, and business agents if any, shall uphold and comply with this policy accordingly.

## **Anti-Fraud and Anti-Corruption Policy**

Directors, executives, and employees of the Company are prohibited from engaging in or accepting any form of bribery and corruption, whether directly or indirectly, for the benefit of themselves, their families, friends, or acquaintances. This prohibition extends to all related businesses and agencies. Furthermore, the Company shall ensure regular monitoring and auditing of compliance with this policy against corruption. Guidelines and operational requirements shall also be reviewed periodically to ensure consistency with business changes, regulations, and relevant laws.

### **Guidelines**

- Directors, executives, and employees, including subsidiaries, associated companies, and other companies under the control of the Company, must comply with the Anti-Fraud and Anti-Corruption Policy, the Corporate Governance Policy, and the Code of Business Conduct. They must not be involved in any form of corruption, whether directly or indirectly.
- Directors, executives, and employees, including subsidiaries, associated companies, other companies under the control of the Company, and business agents if any, are prohibited from demanding, performing, accepting, or being involved in any form of corruption in all forms, whether directly or indirectly. Furthermore, they are prohibited from participating in, performing, or accepting bribes, soliciting any other benefits, or making facilitation payments involving government employees or any other persons in both the public and private sectors that may be considered corruption for the benefit of themselves, their families, friends, or acquaintances.
- The Board of Directors shall ensure regular reviews of compliance with the Anti-Fraud and Anti-Corruption Policy. They shall also define the roles, duties, and responsibilities of relevant parties to ensure consistency with the policies and business operations of the Company.
- Employees must not neglect or ignore any actions that fall under the scope of corruption related to the Company when such actions are witnessed or suspected. They must report such matters to their supervisors or the responsible persons and cooperate in the investigation of facts.
- Employees of the Company must operate with transparency, accuracy, and fairness under the regulations, policies, and guidelines of the Company, particularly in the processes of sales and marketing, procurement, accounting, and finance. Furthermore, they must conduct operations in compliance with relevant laws, especially laws related to anti-fraud and anti-corruption.
- The Company shall disseminate information, provide education, and create an understanding for other persons who perform duties related to the Company, especially regarding compliance with this policy.
- Employees must cooperate in building values and awareness of performing duties with honesty, integrity, and transparency, free from corruption, to establish this as the corporate culture.

- Any person who violates this policy shall be subject to disciplinary action as determined by the Company. In addition, they may face legal penalties if the action is proven to be illegal.
- The Company shall provide fairness and protection to employees who report misconduct or file complaints. This includes no demotions, no punishments, and no negative consequences for employees who refuse corruption or bribery, even if such refusal causes the Company to lose business opportunities.

### **The Additional Guideline**

The Chief Executive Officer has the authority to order or establish additional guidelines to align with the Anti-Fraud and Anti-Corruption Policy.

### **Duties and Responsibilities**

- The Board of Directors has the duty and responsibility to determine policies and oversee the establishment of an effective system that supports the prevention of fraud and corruption. This is to ensure that the Management recognizes and prioritizes the prevention of fraud and corruption, as well as to encourage the effective implementation of policies and guidelines while instilling them as a corporate culture.
- The Audit Committee is responsible for reviewing financial and accounting reports, the internal audit system, the risk management system, and policies and measures against fraud and corruption. They also review guidelines for monitoring and evaluating compliance with the Anti-Fraud and Anti-Corruption Policy to ensure that all processes have appropriate and sufficient internal control systems.
- The Risk Management and Compliance Sub-committee has a duty to oversee and control strict compliance with this policy. They shall provide knowledge dissemination, consultation, and advice regarding anti-fraud and anti-corruption. Furthermore, they support the operations of the Company related to the Thai Private Sector Collective Action Against Corruption project to ensure appropriate cooperation in the anti-fraud and anti-corruption.
- The Internal Auditor is responsible for designing and improving the internal control system of the Company. This includes requesting opinions or conducting internal meetings regarding the internal control system or operating procedures for activities with the risk of fraud and/or corruption with the departments that own the risks or are involved in risk activities. They also audit and review the operations of the Company to ensure compliance with established policies and report audit results directly to the Audit Committee to ensure confidence in the internal control system and reduce the risk of fraud and corruption.
- Executives have a duty and responsibility to implement the Anti-Fraud and Anti-Corruption Policy within the organization. They shall establish effective guidelines that support the policy and provide communication and training regarding such policy and guidelines to employees at all levels. This ensures that employees have sufficient knowledge and understanding to implement relevant policies and

guidelines effectively and efficiently. They also review the suitability of various guidelines to ensure consistency with changes in business, regulations, and legal requirements.

- Employees have a duty to perform their work in accordance with this policy or comply with relevant guidelines. In the event of doubts or upon witnessing a violation of the policy, they must report to their supervisors or via the provided whistleblowing channels.

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## **Corruption Risk Assessment**

The purpose of the corruption risk assessment is to ensure that every department of the Company identifies and reviews fraud and corruption risks while building awareness of potential risks. The Company conducts assessments and reviews of fraud and corruption risks annually to identify emerging risks or changes resulting from various factors.

### **Corruption Risk Assessment Process**

The Company provides risk management appropriate for its business nature to prevent fraud and corruption. This process involves identifying risk events, assessing the level of risk based on likelihood and impact, establishing measures suitable for the assessed risks, and monitoring the implementation of the established risk management plan.

### **Guidelines for the Prevention of and Involvement in Fraud and Corruption**

- Establish internal control procedures and risk management covering activities that may lead to fraud and corruption, such as donations, sponsorships, giving and receiving gifts, entertainment, and hiring government officials. These procedures are for prevention as well as monitoring the performance according to the risk management plan and providing recommendations for appropriate corrective actions.
- Provide channels for whistleblowing or complaints regarding violations, illegal acts, or breaches of the Code of Business Conduct or guidelines related to the prevention of fraud and corruption or internal control systems. Measures are in place to protect whistleblowers and to keep their information confidential. Furthermore, the Company has procedures for investigation and determines disciplinary or legal penalties as applicable.

### **Monitoring and Evaluation of Performance**

- Appoint internal auditors to review internal control systems, risk management, and corporate governance while providing continuous recommendations. Audits are conducted according to the annual audit plan approved by the Audit Committee, and audit results along with recommendations are reported directly to the Audit Committee.
- Require the Risk Management and Compliance Sub-Committee to rank risk levels continuously and to review and improve the measures of fraud and corruption prevention regularly. They are also responsible for monitoring risk assessment results for timely presentation to the Executive Committee and the Audit Committee respectively.

- Communicate guidelines regarding the prevention of fraud and corruption through meetings of the Risk Management and Compliance Sub-Committee and the Company's website to ensure that all directors, executives, and employees are informed and compliant.

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## Political Contribution

The Company maintains a policy of political neutrality and does not provide political support or assistance to any particular party, whether directly or indirectly. However, the Company respects the political rights of employees as good citizens under the Constitution, including the right to vote or hold membership in a political party.

### Guidelines

- Employees must not express in any way that the Company is involved with, affiliated with, or supports political activities, political parties, political coalitions, or political candidates.
- Employees shall exercise political rights in a personal capacity and avoid any actions that could lead others to believe such actions are performed on behalf of the Company.
- Employees must avoid expressing political views or opinions in the workplace or during working hours that could lead to conflicts within the work environment.

## Donation and Sponsorship

Donation and sponsorship to individuals, government agencies, or the private sector, including charitable organizations, must be transparent and legally compliant. Such actions must be conducted without any expectation of benefits or other returns that could be considered fraud and/or corruption.

### Guidelines

- The Company set control measures where documented evidence must demonstrate transparency to allow for the auditing and oversight of donations and sponsorships. Furthermore, such actions must be performed in the name of the Company. The names of the receiving agencies or individuals, the purpose of the donation or sponsorship, and supporting documents or evidence must be specified for submission to authorized persons according to the hierarchy.
- The Company conducts careful considerations to ensure that the receiving organizations or agencies have objectives for genuine social benefit and are not illegal entities. Consistency with policies related to the social responsibility activities of the group of the Company is also considered.
- The purpose of the donation or sponsorship must be to promote a positive image of the Company by creating public benefits or demonstrating the social responsibility of the Company toward society as a whole. It must not be done with the expectation of benefits that could be considered fraud and/or corruption.
- The Company defines the authority for donations and sponsorships by clearly specifying the amounts and the hierarchy of the approval process. Evidence of approval is kept, and transactions are recorded by the Accounting and Finance Department. This includes audits by internal auditors and independent external auditors to ensure that donations and sponsorships are made in good faith and with transparency.

### Procedures

1. The requester specifies the name of the receiving agency or individual and the purpose of the donation or sponsorship in the document seeking approval.
2. Submit all documents along with evidence to seek approval from the authorized person according to the level of approval authority for donations and sponsorships.
3. Submit all fully approved documents to the Accounting and Finance Department to proceed with the disbursement.
4. After the donation or sponsorship has been completed, the requester must submit evidence of the transaction, such as receipts, letters of appreciation, photographs, and other materials, to the Accounting and Finance Department as proof.

5. The Risk Management and Compliance Sub-Committee shall monitor and audit the process to ensure that the donation or sponsorship is used for public benefit or truly fulfills the intended purpose.
6. If it is proven that the donation or sponsorship was used as a pretext or a channel for fraud or corruption, the Company will impose the maximum disciplinary measures on the offenders.

#### Approval Levels for Donation and Sponsorship

Amount	Authorized Persons		
	Deputy Level	Chief Level	Chief Executive Officer
Not exceeding 30,000 baht	/		
Exceeding 30,000 baht but not exceeding 100,000 baht		/	
Exceeding 100,000 baht and above			/

## **Giving and Receiving Gifts and Entertainment**

Giving or receiving gifts, souvenirs, property, or any other benefits, as well as providing or accepting entertainment, may be conducted provided that such actions follow customary traditions in each locality or country and comply with relevant laws. These must be of appropriate value and must not create an incentive for improper decision making.

### **Guidelines**

- Directors, executives, and employees, including subsidiaries, associated companies, other companies under the control of the Company, and business agents if any, are prohibited from demanding, receiving, or giving gifts, souvenirs, property, or any other benefits, or entertainment that is unnecessary or exceeds the normal value that individuals would typically offer each other, or that exceeds Company's terms or conditions.
- The giving and receiving of gifts, souvenirs, property, or any other benefits, or entertainment must be reasonable, disclosed, and transparent. Such acts must follow social etiquette or customary traditions in each locality or country and must not violate the Company's policies or regulations and relevant laws.
- Gifts, souvenirs, property, or any other benefits, or entertainment must not be received or given if they could create influence or incentive to perform, refrain from performing, or carry out any improper actions.
- The value for giving and receiving gifts, souvenirs, property, or any other benefits must not exceed 3,000 baht per person per occasion.
- Supporting documents for the payment of gifts, souvenirs, property, or any other benefits, or entertainment must be properly maintained so they are available for auditing.

### **Procedures**

#### **Giving Gifts**

1. The requester evaluates the appropriateness of giving gifts, souvenirs, property, or any other benefits. The value of the item should not exceed 3,000 baht per person per occasion and requires approval from the supervisor. If the value exceeds 3,000 baht per person per occasion, approval must be obtained from the Chief Executive Officer.
2. The requester submits the document seeking approval to the supervisor. Such proposal must include at least the following information:
  - Full name and position of the requester
  - Objective
  - Description and price of the item to be given

- Name of the individual or agency receiving the gift
  - Opinion of the supervisor
  - Opinion of the Chief Executive Officer if the value exceeds 3,000 baht per person per occasion
3. The requester submits all approved documents to the Accounting and Finance Department, which will verify the accuracy and completeness of the documents before processing the payment.
  4. After the gift has been given, the requester must submit evidence such as receipts, photographs, etc., to the Accounting and Finance Department as proof.
  5. The Administration Department shall record data regarding the giving of gifts, property, or other benefits. These records are reviewed regularly by the Risk Management and Compliance Sub-Committee to ensure that such items are not disguised forms of corruption.
  6. If it is proven that the giving of a gift was used as a pretext or a channel for fraud and/or corruption, the Company will impose the maximum disciplinary measures on the offenders.

#### Receiving Gifts

1. Employees shall refrain from accepting gifts, souvenirs, property, or any other benefits in all cases and shall thoroughly inform external parties of the no gift policy. In cases where it is impossible to refuse or return a gift, property, or benefit with a value not exceeding 3,000 baht, the supervisor shall evaluate and proceed as appropriate for the following items:
  - Food or consumer goods that have an expiration date or are perishable
  - Calendars, stationery, or materials used as public relations media for that specific agency
  - Souvenirs received by employees from participating in events or significant business occasions
  - Prizes received by employees from any competitions or contests
  - Gifts, souvenirs, property, or any other benefits provided according to customary traditions
2. In cases where the supervisor considers the receipt inappropriate or if it is necessary to accept gifts, souvenirs, property, or any other benefits with a value exceeding 3,000 baht, the recipient must submit a Gift Receipt Registration Form along with the item to the Administration Department. This department will collect the items as evidence. The form must include at least the following information:
  - Full name and position of the recipient
  - Name of the individual or company providing the gift
  - Date, details, quantity, and estimated value of the item received
3. The Company shall donate the items received under clause no.2 to charity or for public benefit or carry out other appropriate actions.

4. The Administration Department shall record the information on the receipt of gifts, property, or other benefits. The Risk Management and Compliance Sub-Committee shall review these records regularly to ensure that such items are not disguised forms of corruption in the form of receiving gifts.

#### Entertainment and Hospitality

1. The requester shall specify the details of entertainment and hospitality in the document seeking approval.
2. The details of entertainment and hospitality services must include at least the following information:
  - Full name and position of the requester
  - Objective
  - Nature and price
  - Name of the individual or agency receiving the entertainment
3. Submit all documents along with evidence such as price quotations or receipts to seek approval from the supervisor in accordance with the manual of authority. The disbursement of expenses is based on the previously approved budget per instance. Such approval must not exceed the annual budget limit approved by the Board of Directors' meeting for that year.
4. The requester submits all approved documents to the Accounting and Finance Department, which will verify the accuracy and completeness of the documents before processing the payment.
5. If it is proven that entertainment and hospitality were used as a pretext or a channel for fraud or corruption, the Company shall impose the maximum disciplinary measures on the offenders.

### **Bribery and Facilitation Payment**

The Company has no policy to give or receive bribes, including any form of facilitation payments, whether directly or indirectly. The Company will not engage in or accept any actions in exchange for facilitating business operations, whether such operations are conducted directly by the Company or through a third party. This commitment extends to subsidiaries, associated companies, other companies under the control of the Company, and business agents if any.

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## Revolving Door Policy

The Revolving Door Policy was established to appoint government officials as consultants, directors, or executives. This policy requires a selection process, hiring approval, compensation determination, and control processes to ensure that the employment of such personnel is not a reward for obtaining any benefits or for the purpose of favoring the Company.

### Guidelines

- The Company shall not hire or appoint government officials who are still in office.
- A cooling off period of two years is required for the appointment of former government employees who have left their positions or individuals who previously worked for regulatory agencies directly related to the Company.
- Background checks must be conducted on individuals whom the Company intends to recruit as directors, consultants, or executives to identify potential issues regarding conflicts of interest before the appointment.
- Prohibitions on duties and operating procedures are established to prevent the misuse of power or conflicts of interest. This includes the disclosure of secrets of the former government agencies to which they belonged, lobbying for improper benefits, or being assigned to contact their former agencies.
- The names and profiles of individuals who are former government employees appointed as consultants, directors, or executives must be disclosed. The reasons for their appointment must also be stated through various communication channels of the Company as required by law.

## Prevention of Conflict of Interest

The Company conducts its business in strict adherence to the principles of Good Corporate Governance and Code of Business Conduct. Furthermore, the Company encourages its employees to possess virtue and perform their duties with honesty, integrity, transparency, and accountability.

### Guidelines

- Directors, executives, and employees must avoid any actions that result in a conflict of interest with the Company. Any operation must be reasonable and based on the best interests of the Company while complying with relevant laws and regulations. Employees have a duty to report to their supervisors if any actions or circumstances arise that could be considered a conflict of interest with the Company.
- Employees may recommend individuals for employment with the Company. However, such individuals must possess capabilities that benefit the Company, and personal relationships must not be used to secure the position. Furthermore, employees are prohibited from being involved in hiring decisions regarding their spouse, parents, children, or any other person with a close relationship.
- Directors, executives, and employees of the Company should refrain from holding shares in competing businesses if such holdings cause the director or employee to perform or omit an action required by their duty or if it impacts their professional performance. In cases where shares were acquired before becoming a director or employee, before the Company entered that business, or through inheritance, the director or employee must report this to their supervisors according to the hierarchy.
- Directors, executives, and employees are prohibited from acting as an employee, agent, consultant, or serving in any other capacity for a business of a similar nature that significantly competes with the Company during their employment.
- Directors, executives, and employees of the Company must remain mindful of actions that may cause a conflict of interest and must not engage in any activities or businesses of a similar nature that significantly compete with the Company.
- Directors, executives, and employees must not exploit their positions within the Company for personal gain by recommending, selling, or acting as an intermediary to promote products or services that are not provided by the Company.
- During employment and after termination of employment, employees must maintain the confidentiality of the Company's information and must not disclose it to others. This includes electronic data, financial information, operational data, and any other confidential matters.
- In the event of any action or situation where a conflict of interest is suspected, the employee must provide a written disclosure of the suspected item. This report should be submitted to their supervisors and the

Company Secretary to enter the review process to determine whether a conflict exists and how to proceed. Such reports must be submitted annually and every time a change occurs.

- Directors and executives must consider conflicts of interest regarding related party transactions carefully, with honesty, integrity, and independence within a framework of good ethics while prioritizing the best interests of the Company.
- Directors and executives shall report their own interests or the interests of related persons to the Company annually and every time a change occurs.

## **Procedures**

To ensure transparency and fairness toward stakeholders and to prevent conflicts of interest, the Company has established processes for reporting, auditing, and continuously updating data. Furthermore, the Company provides for the verification of connections between various types of stakeholders and its employees as follows:

### **New Employees**

1. The Human Resources Department explains the requirements and ensures that new employees fully complete the employee interest disclosure form after the orientation.
2. The Human Resources Department maintains the original form as evidence and sends a copy to the Company Secretary.
3. The Company Secretary verifies the information and records the data in the Company's Register of Interests.

### **Directors and Executives**

1. The Company Secretary explains the requirements and provides the interest disclosure form for directors and executives to newly appointed directors or executives for completion.
2. The Company Secretary audits the information. Initially, this involves verifying connections or interests that the executive or director may have with the Company, business partners, customers, and employees. This includes reviewing shareholding structures within the Company and its group to identify interests and determines if such risks or connections impact decision making in a way that causes a lack of transparency, a conflict of interest, or an obstacle to work. The data is then recorded in the Company's Register of Interests. In cases where risks are identified, the matter shall be reported to the Board of Directors for acknowledgement.

## Updating Information

1. **Employees:** Employees must complete the employee interest disclosure form and submit it to their supervisors according to the hierarchy and to the Company Secretary immediately upon becoming aware of any changes.

**Directors and Executives:** Directors and executives must complete the interest disclosure form for directors and executives and submit it to the Company Secretary immediately upon becoming aware of any changes. The Company Secretary shall subsequently report such changes to the Board of Directors for acknowledgement.

2. The Company Secretary verifies the information and records the data to ensure the Company's Register of Interests remains current.

## **Verification of Connections between Stakeholders and Employees, Directors, and Executives**

### Human Resources Department

The Human Resources Department conducts audits of the connections and interests of employees to determine whether such risks or connections impact decision making, leading to a lack of transparency, a conflict of interest, or an obstacle to work. In cases where a risk is identified, the Human Resources Department shall notify the supervisor of that employee for appropriate consideration.

### Company Secretary

The Company Secretary conducts audits of the connections and interests of directors and executives to determine whether such risks or connections impact decision making, leading to a lack of transparency, a conflict of interest, or an obstacle to work. In cases where a risk is identified, the Company Secretary shall notify the Board of Directors for appropriate consideration.

### Administration Department

The Administration Department conducts audits of the connections and interests of suppliers in relation to all employees, directors, and executives to determine whether such risks or connections impact decision making, leading to a lack of transparency, a conflict of interest, or an obstacle to work.

In cases where a risk is identified regarding an employee, the Administration Department shall notify the supervisor, the Human Resources Department, and the Company Secretary. Furthermore, measures shall be taken to ensure that the employee is excluded from sensitive information and is not involved in the sales process. For directors and executives, the Administration Department shall notify the Company Secretary to report the matter to the Board of Directors for appropriate consideration.

## **Procurement**

The Company has no policy to receive, solicit, give, or offer money or any other benefits to vendors or service providers in exchange for selection as a bidder or for entering into a procurement contract. The Company's procurement must be transparent and fair to all parties. The Purchasing Section shall ensure that evaluations are conducted prior to registration as a vendor of the Company and proceed with seeking procurement approval from authorized persons according to the levels of approval authority in the manual of authority. This process must comply with policies related to procurement or other documents of a similar nature. Furthermore, the Company will communicate and build an understanding regarding compliance with policies and guidelines related to the prevention of corruption for third parties, vendors, and service providers from the commencement of the business relationship and subsequently as appropriate.

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## Internal Control and Internal Audit

The Company has a policy for every department to work systematically in accordance with its objectives and goals. There is an internal control system that includes the efficient and effective maintenance and use of assets to prevent undesirable events that may cause damage to the Company. This system encourages the employees to perform their duties in compliance with relevant regulations and laws. Furthermore, all departments must be prepared for the Company to assess and audit their work at any time.

### Guidelines

- Executives at all levels have the duty and responsibility to oversee and audit the working systems within their departments to ensure efficiency and accuracy. This includes maintaining sufficient and rigorous internal controls that are verifiable.
- Internal control guidelines that incorporate risk assessment and management allow each department to evaluate and control risks within their own units. The Company requires all employees to participate in reducing the impact or likelihood of various risks.
- The Company provides an internal auditor to ensure that significant operations and financial transactions are conducted efficiently and according to established guidelines. Reviews cover financial controls, operations, compliance with fraud and corruption prevention measures, as well as relevant laws and regulations. The internal auditor operates independently and reports audit results directly to the Audit Committee. Each department is responsible for implementing recommendations from the internal auditor to improve and develop more effective internal controls.
- The Company provides for the urgent reporting of issues found during internal audits to the Chief Executive Officer and the Board of Directors. The reporting of deficiencies covers urgent and serious cases as well as the internal audit charter.
- The Company ensures communication between executives and officers, as well as between different departments, to promote understanding and coordinate operations.

## Accounting and Finance

The Company prioritizes accounting and financial reports, which must be accurate, complete, factual, timely, reasonable, and reliable for submission to the Management, shareholders, government agencies, and other related parties. Therefore, it is required that the employees at all levels strictly comply with the procedures or processes related to the accounting and financial systems and internal controls, including the accounting and financial regulations of the Company as well as generally accepted accounting principles.

### Guidelines

- Recording business transactions of the Company must be accurate, complete, and verifiable without any restrictions or exceptions to truthful recording under accounting standards and in compliance with relevant laws and regulations. Supporting documentation for business entries must be complete and subject to appropriate verification.
- Every type of accounting and financial report must be accurate and clear, containing sufficient material information while ensuring appropriate disclosure of important data according to generally accepted standards and the financial and accounting regulations of the Company.
- All employees must comply with the policy and relevant legal requirements to ensure that the preparation of accounts and recording of the Company's financial reports are accurate and complete, consistent with the performance of other duties. They must uphold the principles of honesty and remain free from bias.

## Data Recording and Retention

The Company has a policy to comply with standards, principles, and applicable laws regarding accounting and financial data reports. The Company does not tolerate the recording of false or inaccurate information or the manipulation of accounts. Furthermore, there shall be no off balance sheet accounts used to support or conceal fraud and corruption.

### Guidelines

- The Company provides a system for data retention and protection by defining individual access rights to electronic information. This includes the systematic categorization of documents, records, and financial reports using an efficient and verifiable storage system.
- Every employee must protect and maintain their username and password. Sharing, publishing, distributing, or disclosing these credentials to others without authorization is strictly prohibited.
- Accounting entries for business transactions used in financial reports are recorded in the general ledger within the Company's accounting software. Furthermore, data backups are performed according to established schedules.

## Human Resources and Training

The Company maintains human resource management processes, including recruitment, selection, promotion, training, performance evaluation, compensation, and the determination of penalties, that reflect the commitment of the Company to measures against fraud and corruption. Furthermore, supervisors at all levels are required to communicate and create an understanding with their subordinates regarding policies and guidelines related to the Anti-Fraud and Anti-Corruption Policy.

### Guidelines

- The Company disseminates policies and guidelines related to the prevention of fraud and corruption through various communication channels. This includes the Company's website, email, disclosures in the annual report (Form 56-1 One Report), and the orientation etc.
- Continuous training regarding the policy against fraud and corruption is provided to directors, executives, and employees at all levels. Particular focus is placed on employees involved in transactions with high corruption risk to ensure they fully understand the policy and are aware of the penalties for non-compliance with the established measures.
- Fairness and protection are guaranteed through human resource management processes for the employees who refuse to participate in or choose to report fraud or corruption. The Company shall not demote, punish, or impose negative consequences on such employees, even if their refusal results in the loss of business opportunities.
- Regular policy reviews are conducted to ensure that guidelines related to the prevention of fraud and corruption remain current and appropriate for business operations.
- Seeking guidance is encouraged if an employee is uncertain whether an action constitutes fraud or corruption. If there are questions or concerns regarding compliance under this policy, employees may seek advice from their supervisor or the Risk Management and Compliance Sub-Committee.

## Whistleblowing

The Company has established mechanisms for reporting, filing complaints, or whistleblowing upon discovering or witnessing misconduct, or in cases where one is an injured party affected by fraud and corruption or a failure to comply with laws, policies, and Company regulations. This includes appropriate protection measures for whistleblowers according to the whistleblowing policy to provide clear guidelines and ensure the efficient handling of complaints.

### Whistleblowing Channel

- Postal mail  
Independent Director and Audit Committee Chairman (Whistleblowing)  
Business Alignment Public Company Limited  
92/45, Sathorn Thani 2 Building, 16th Floor, North Sathorn Road, Silom, Bangrak, Bangkok 10500
- Email  
[biz-cg@bizalignment.com](mailto:biz-cg@bizalignment.com)

### Protection and Confidentiality of Whistleblowers or Related Persons

The Company provides protection for whistleblowers, complainants, informants, witnesses, or those involved in a complaint. These individuals shall have their rights protected by the Company which shall protect and maintain the confidentiality of all information and evidence that could identify the whistleblower, complainant, informant, witness, or related persons.

Fairness and protection shall be provided for the employees who report misconduct or file complaints. Furthermore, the Company shall not demote, punish, or impose negative consequences on the employees who refuse fraud and/or corruption, even if such actions result in the loss of business opportunities.

## Violations

Policies and guidelines related to the prevention of fraud and corruption are considered an integral part of work discipline for directors, executives, and employees of the Company. Any individual who violates, neglects, or intentionally fails to comply with Company's policies and guidelines shall be subject to disciplinary action. This also applies to direct supervisors who ignore misconduct or are aware of an offense but fail to take corrective action. Disciplinary measures range from verbal and written warnings, wage deductions, or unpaid suspension, to termination of employment or removal from office for directors. Penalties are determined based on the severity of the offense, conduct history, and the intent of the offender, with the possibility of multiple penalties being imposed simultaneously. Additionally, if the offense constitutes an illegal act, the Company shall proceed with legal action in accordance with relevant laws.

WEBSITE

### **Review of the Policy**

The Company shall review the Anti-Fraud and Anti-Corruption Policy at least once a year to ensure that it remains current and appropriate for its business operations. This policy was approved by the Board of Directors' Meeting Number 5/2025 on November 10, 2025.

WEBSITE