



Announcement No. 28/2026

Anti-Corruption and Anti-Bribery Policy

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Crown Seal Public Company Limited (“the Company”) is committed to conducting business with adherence to the principle of integrity and responsibility to all groups of stakeholders in accordance with the principle of good corporate governance and the Company’s Code of Conduct by perpetually placing the emphasis on fair treatments, honesty, transparency, based on the principle of mutual respect verifiability and in accordance with the principle of good corporate governance. In 2016, the Company had participated in Thailand’s Private Sector Collective Action Coalition Against Corruption” to express our intention and commitment to combating against all forms of corruptions and anti-bribery.

In order to establish clear practical guidelines in carrying out the business operations and developing the Company into a sustainable body, we therefore reviewed this “Anti-Corruption and Anti-Bribery Policy” that had been promulgated to ensure that the Company has a Policy to define responsibility, practical guidelines, requirements for proper actions, prevention of misfeasance and corruption and anti-bribery in all activities of the Company and to enable the decision making on the business operations that may be at risk of misfeasance and corruption and anti-bribery to be carefully made and acted on.

Definition:

Misfeasance means an unlawful exploitation of the Board of Directors, the management and employees of the Company, the Company’s customers and business partners or the Company’s counterparties: such as; a falsification of report both in the financial and non-financial reports, making false financial evidence, taking Company’s property for personal use, misappropriation, embezzlement and cheating, acts involving conflicts of interest, etc.

Corruption means a bribery in any form by offering to give, pledging to give, giving, promising to give, demanding or accepting money, property or any other benefit, to a government official. government agency, private agency or those having duties, whether directly or indirectly, in order to

persuade such persons to perform or omit to perform their duties so that the business can be acquired or maintained or recommended to the Company, in particular, or that any other benefit which is unsuitable for the business interest can be acquired or maintained except in the case that the laws, regulations, announcements, regulations, local customs or trade customs are permissible.

Bribe means property, gifts, or other benefits given to a person in order to induce them to perform or refrain from performing an action as desired by the payer (Royal Society of Thailand).

Anti-Corruption and Anti-Bribery Policy

To ensure the Company's business operations align with current global changes, as well as to elevate standards to be equivalent to business partners, and to have operations regarding anti-corruption and anti-bribery equivalent to stakeholders as a standard, which is a concrete expression and is truly put into practice, as well as aiming toward being an organization with sustainability in all aspects, by giving importance to corporate governance under a management framework of having good ethics, transparency, and being verifiable; especially processes related to or at risk of all forms of corruption and bribery within the Company, whether directly or indirectly. Therefore, the Company has established the following anti-corruption and anti-bribery policy:

1. The Company's Board of Directors, the management and employees of the Company are prohibited to carry on actions or accept any form of a misfeasance and anti-corruption and anti-bribery, both directly and indirectly, by expanding to thoroughly cover all types of businesses and all relevant departments, with readiness to provide supports or encourage stakeholders, customers, business partners and associated companies to have the same practices as the Company, reject of corruption by business partners and regular reviews on the compliance with this anti-corruption and anti-bribery policy as well as reviewing the practical guidelines to be in line with the changes in the business, regulations and legal requirements.
2. The anti-corruption and anti-bribery measures are the duty and responsibility of the Board of Directors, the management, employees of the Company, customers, business partners, related companies or associated companies to take part in expressing their opinions on the practices in

order to make the anti-misfeasance and anti-corruption and anti-bribery actions achieved the goal in accordance with the specified Policy.

3. The Company has established a risk assessment process for activities with a risk of anti-corruption and anti-bribery. It has implemented policies to prevent anti-corruption and anti-bribery in accordance with the activities. Establishment of audit processes systems and operating procedures that may lead to corruption and bribery, particularly in sales activities, marketing, raw material procurement, insurance, contract preparation, and risk assessment itself. Risk assessments are conducted regularly, and preparation to make a Practical Guideline Handbook for related personnel, and appropriate corrective actions are taken.
4. Directors, executives, and employees of the Company must not engage in or support, and must exercise caution with respect to political contributions, conflicts of interest, and the giving or receiving of gifts, money, or any other form of support, assets, or benefits, including hospitality service fees, entertainment, and other related expenses. Any gifts, money, or other forms of support, assets, or benefits, including hospitality service fees, entertainment, and other related expenses, must be for legitimate business purposes, legal requirements, or established customary practices only, and must be of appropriate value. Furthermore, all charitable donations made by the Company, whether in kind or monetary, are subject to a verification, approval, and review process, requiring documentation consistent with Company policies and applicable laws to ensure that such donations are not used for the purpose of corruption or bribery.
5. The Company maintains appropriate and effective internal controls over the accounting preparation process and the retention of data, documents, and records that have been audited to verify process efficiency in accordance with the Company's anti-corruption and anti-bribery measures, preventing corruption and bribery throughout the organization. Furthermore, the Company ensures its financial reports are prepared in compliance with anti-corruption and anti-bribery practices.
6. The Company recognizes the importance of fostering a culture of anti-corruption and anti-bribery by disseminating knowledge and providing ongoing training to its directors, executives, and employees of the Company, as well as consistently communicating information regarding anti-corruption and

anti-bribery measures and associated penalties. In order to enhance the honesty, integrity and responsibility in performing their duties.

7. The Company has established procedures in the retention of various documents and records readily available for audit, and to ensure the accuracy, suitability, and transparency of financial reports. This is to ensure that there are no items that are unrecorded, or cannot be explained, or are false items.
8. Directors, executives, and employees of the Company must not ignore or overlook any actions that may violate the anti-corruption and anti-bribery measures, provides channels for whistleblowing or complaints in order to enable the employees and related parties to report any suspicious clues or for those who need advice or consultation on compliance with the anti-corruption and anti-bribery measures. By ensuring that the whistleblowers are protected without being punished with unfair transfer or being persecuted in any way whatever and including appointing a person to investigate, track down every clue having been notified.
9. The Company has a policy for human resource management and development, and human resource processes that demonstrate its commitment to anti-corruption and anti-bribery measures. It also has a policy of not demoting, penalizing, or taking negative action against personnel who refuse to participate in corruption and bribery, and maintains clear communication channels regarding this policy.
10. The Company communicates its anti-corruption and anti-bribery policy to other stakeholders, including customers, business partners, and the public, through various communication channels in order for them to be informed and to implement it.
11. Directors, executives, and employees of the Company must avoid any actions that create a conflict of interest with the Company. All actions must be reasonable and based on acting in the Company's best interests and must comply with applicable laws and regulations. If any action potentially constitutes a conflict of interest, the individual concerned must report it in accordance with the Company's established guidelines and procedures.
12. The Internal Audit Office is responsible for reviewing operations to ensure they are conducted correctly and in compliance with anti-corruption and anti-bribery policies and guidelines and the table of authority. This is to ensure an appropriate and adequate control system is in place to mitigate

potential corruption risks, and to report to the Audit Committee any issues found that do not comply with these policies and guidelines and table of authority. Relevant departments must be notified so that there is an improvement of appropriate and sufficient control measures.

13. The Company Secretary Office may report urgent corruption-related matters to the President and immediately to the Board of Directors.

Duties and Responsibilities:

1. **The Board of Directors** has the duties and responsibilities to formulate policies and provide supervisions to ensure that there is a system that supports the effective anti-corruption and anti-bribery measures practices in order to be assured that the management faction is aware of and has placed the importance on the anti-corruption and anti-bribery practice and instill it until it becomes part of the company culture.
2. **The Audit Committee** has the duties and responsibilities for reviewing financial and accounting reporting systems, internal control system, internal audit system, risk management system and anti-corruption and anti-bribery practice system to ensure that they are in accordance with the international standards and are efficient.
3. **General Manager and the Management** has the duties and responsibilities to define the system and promote the anti-corruption and anti-bribery Policy in order to communicate the same to all levels of employees and related parties including reviewing the suitability of various systems and measures to be consistent with the changes in the business, regulations and legal requirements.
4. **Internal Audit Office** has the duties and responsibilities to inspect and review the operations to ensure that they have been practiced properly in accordance with the policies, standard operating procedures, and relevant laws and regulations in order to be assured that an appropriate and sufficient internal control system is available to prevent a contingent misfeasance and concise corruption and bribery practice and then report the same to the Audit Committee.
5. **Anti-Corruption and Anti-Bribery Committee** has the duties and responsibilities to control the operations to be in accordance with the Policy and monitor the anti-corruption and anti-bribery measures for practical implementation. The Committee members are appointed from responsible

persons of various departments of the organization to report and analyze the risks to be in line with the changing situation.

Practical Guidelines:

1. Directors, the management and employees of the Company at all levels must comply with the anti-corruption and anti-bribery Policy and the Company's Code of Conduct without being getting involved in the corruption and bribery, whether directly or indirectly, or for the purpose of benefiting oneself, family, friends, and acquaintances.
2. All employees of the Company must not ignore or overlook any actions that constitute corruption and bribery related to the Company. They must report such actions to their supervisors or responsible persons and cooperate in the investigation of facts. If there are any doubts or questions, they should consult with their supervisors or the person designated by the Company to be responsible for monitoring compliance with the Company's Code of Conduct through channels specified by the Company.
3. The Company shall fairly treat and protect the employees who refuse the act of misfeasance and corruption and bribery in relation to the Company. In this connection, the Company has a measure that does not have any actions to demote, punish, or provide negative effects toward employees who refuse corruption and bribery, even if the action causes the Company to lose business opportunities. In this regard, the Company has established operating procedures for each department to clarify roles and responsibilities, and to ensure accurate, appropriate and sufficient monitoring and auditing processes are in place.
4. Directors, the management and employees of the Company whoever committing an act of misfeasance or corruption and bribery shall be considered to act in violation of the Company's and the Code of Conduct and shall be subject to a consideration for punishment under the Rules of Disciplinary Action as set out by the Company which may possibly be punished under the law if such action is against the law.
5. The Company realizes the importance of the dissemination and provision of knowledge and the making duties, or potential consequences of understanding with the other people who have to

perform work in relation to the Company on matters that they must comply with in order to conform with the Company's anti-corruption and anti-bribery Policy.

6. The Company is committed to creating and maintaining an organizational culture that firmly believes corruption and bribery are unacceptable in all transactions, whether with the public or private sector.

Requirements on Taking Actions:

1. The anti-corruption and anti-bribery policy expands to cover of the policy encompasses human resource management, the process personnel management from personnel recruitment or selection, promotion, training, employees' performance evaluations and incentive rewards which, in this respect, supervisors at all levels are required to communicate and get to understand with the employees for use in business activities, ensuring effective implementation and oversight.
2. Any action in accordance with the anti-corruption and anti-bribery policy shall be undertaken by using the operating guidelines defined under the Company's anti-corruption and anti-bribery measure manual, code of conduct, corporate governance policy and policy handbook including related Company's regulation and operating manual as well as any other practical guidelines which the Company will further establish.
3. Directors, executives, and employees of the Company are prohibited from soliciting, engaging in, or accepting corruption and bribes for their own benefit, or for the benefit of their families, friends, and acquaintances.
4. For the clarity in carrying out actions on the matter of high risk that will give rise to a misfeasance or a corruption and bribery practice, Directors, the management and employees of the Company at all levels must perform their duties with carefulness and in accordance with the following matters:
 - 4.1 The giving or receiving of gifts, money, or other support, property, or benefits, including hospitality fees, entertainments and expenses, the giving or receiving of gifts shall be as stipulated in the Company's Code of Conduct.
 - 4.2 Money for charitable donations or sponsorships, the giving or receiving of donations or financial support must be in a manner of transparency and properly in accordance with the law by being assured that must not be used as a pretext for bribery and corruption.

4.3 The facilitation payments;

No facilitation payments shall be made to any government employees.

4.4 Political Contributions;

- The Company is politically neutral by which no actions shall be undertaken in a manner likely to be in favor of or providing financial support or other forms to a political party, a political coalition, a person with political power or a political candidate, whether directly or indirectly, at the local, regional or national level.

- Board of Directors, the management and employees of the Company must strictly comply with the Company's Code of Conduct with regard to the political actions.

4.5 Revolving Door

No revolving door which will cause conflict of interest shall be made.

4.6 Business relationship and procurement with the government sector; Giving or accepting a bribe for facilitation of all types of business transactions is prohibited. Company operations including the contacts with government sector for jobs must be transparent, honest and must be acted upon in accordance with the relevant laws.

Communications and Training:

1. The Company provides communications on and disseminations of the Anti-Corruption and Anti-Bribery Policy to the management and employees of the Company's through various channels and means: such as; orientations for new directors and employees, training or seminar, Administrative Faction monthly meeting, staff clarification meeting, public relations within the workplace and through various electronic systems of the Company including periodic communications to the Company's personnel the management and employees of the Company to be aware of on the various forms of misfeasance and corruption and anti-bribery, the risks in getting involved with a misfeasance or corruption and anti-bribery and the method of whistleblowing for practical implementation.
2. The Company communicates and disseminates the anti-corruption and anti-bribery policy including channels for whistleblowing, giving information or lodging complaints, to the directors, the management and employees of the Company, shareholders, business partners, stakeholders and

those involved in the business to be aware of so that they through various channels: such as; the website, Form 56-1 One Report and other methods as appropriate, etc. including integrating these measures into corporate activities and annual employee training sessions., in order to create understanding and support the anti-misfeasance and corruption matter and anti-bribery.

Penalty:

In the event that the Company's directors, executives, employees, and other persons associated with the Company, such as business agents, intermediaries, contractors, or service providers, violate, neglect, omit, or intentionally fail to comply with the policy. The anti-corruption and bribery guidelines, or company regulations, may result in penalties and be considered disciplinary offenses, subject to punishment as determined by the Company. Furthermore, legal penalties may be imposed if the action is illegal and claiming ignorance of this policy and/or applicable laws cannot be used as an excuse for non-compliance.

Anyone who intentionally or negligently fails to comply with these regulations, including behavior that is akin to bullying, intimidation, disciplinary action, or unfair discrimination, will be subject to legal action. As a result of a tip-off or complaint filed with the tip-off person, the complainant, or any person involved in the implementation of these regulations. That person shall be deemed to have committed a disciplinary offense and shall be held responsible for any damages caused to both the company and those affected by such actions.

Measures and Channels for Whistleblowing or Lodging Complaints:

The Company has established channels for lodging complaints or whistleblowing on the commission of offence against the law, Code of Conduct of the Company, Anti-Corruption and Anti-Bribery Policy, behaviors that may suggest a misfeasance or a misconduct of individuals in the organization, including employees, the management and stakeholders as well as having a mechanism to protect the informants and placing the importance on keeping the complaints in confidence in order to give reassurance to the complainants. This includes the appropriate protection measures for the whistleblowers to be a clear guideline and make it possible to receive complaints effectively.

The Company fully wishes that this Anti-Corruption and Anti-Bribery Policy would cooperatively be adhered to by its directors, management and employees as well as its stakeholders in order to give rise to the perpetual sustainability. This Policy is revised in accordance with the resolution of the Board of Directors Meeting on February 27, 2026, and has been put into force as of and from March 1, 2026.

Notification made to inform all concerned to adhere to as the practical guidelines for common practice.

Announced on 1 March 2026



(Mr. Pongpanu Svetarundra)

Chairman of the Board of Director
Crown Seal Public Company Limited