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Unique Plastic Industry Public Company Limited and its subsidiaries (the “**Company**”) are committed to conducting business with a strong emphasis on anti-corruption, upholding integrity and ethical standards, operating with transparency, and demonstrating responsibility toward all stakeholders. The Company recognizes the importance of refraining from the abuse of authority or position, and strictly complying with applicable laws, ethical standards, rules, and Company policies. The Company shall not engage in, support, or tolerate any act or omission that may cause others to believe that a person holds a position or authority which he or she does not possess, nor shall it abuse authority or position to seek undue or unlawful benefits for oneself or others in any form. Such prohibited conduct includes, but is not limited to, requesting, offering, or giving money, assets, or any other benefits to government officials or any other persons with whom the Company conducts business.

To ensure that the Company’s operations are conducted in accordance with the anti-corruption principles and framework as defined by the Company, the Company has established this Anti-Corruption Policy to serve as a guideline for implementation and compliance, as follows:

1. Definitions

“**Corruption**” means the abuse of power or position for the purpose of obtaining undue benefits, including the giving or receiving of bribes in any form, whether through offering, promising, committing, requesting, giving, or receiving money, assets, or any other improper benefits, directly or indirectly, to or from government officials, government agencies, private sector entities, or any person with a duty, in order to induce such person to act or refrain from acting in the performance of duties, or to obtain or retain improper business advantages.

“**Charitable Donations**” mean activities involving the expenditure of funds without receiving any tangible return.

“**Public Donations**” mean the expenditure of funds for projects or activities intended to benefit communities, society, or the general public, whereby the Company may not receive any tangible return.

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“**Political Contributions**” mean any support provided in the name of the Company, whether financial or in other forms, to support political activities. Financial support may include loans, while non-monetary (in-kind) support may include the provision of goods or services, advertising, promotion or support of political parties, the purchase of tickets for fundraising events, or donations to organizations closely affiliated with political parties. This shall exclude support for democratic processes that are legally permissible under applicable laws.

“**Sponsorships**” mean payments made for services or benefits that are difficult to measure or monitor and may be linked to bribery risks. Sponsorships may involve hidden purposes, such as using sporting events, charitable activities, or charitable organizations as a front to obtain improper advantages in the consideration or discretion of government officials or related people. Examples of such improper advantages include the awarding of contracts, business opportunities or bids, the reduction or waiver of fees, the granting of assistance, or the waiver of licensing requirements not in accordance with normal governmental decision-making processes, the reduction or exemption of legal requirements, or facilitating access to government officials.

“**Government Officials**” mean “state officials” as defined under the law governing the prevention and suppression of corruption, and shall include civil servants, state officers, employees of state enterprises, employees, agents, or any other persons acting on behalf of the following entities:

- Ministries, bureaus, departments, or other government agencies (e.g., the Customs Department, the Immigration Bureau, etc.)
- International organizations (e.g., the World Bank, the International Monetary Fund, etc.)
- Political parties, political office holders, or election candidates (both government and opposition), and local administrators
- Regulatory authorities (e.g., the Securities and Exchange Commission, the Bank of Thailand, the Stock Exchange of Thailand (“SET”))

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- State enterprises, or companies or other organizations in which the State or a government agency owns or exercises control

2. Anti-Corruption Policy

2.1 Directors, executives, and employees of the Company shall not request, engage in, participate in, or accept corruption in any form, whether directly or indirectly, for the benefit of the organization, themselves, their families, relatives, friends, or associates, or for any business-related benefit. This policy applies to all business operations in all countries and to all units and entities related to the Company. All business dealings with any entities, whether government agencies, state enterprises, or private sector entities, both domestically and internationally, shall be conducted in a transparent, fair, and lawful manner, in compliance with the laws of Thailand and the applicable laws of the foreign jurisdictions in which the Company conducts business.

2.2 The Company shall regularly review and monitor compliance with this Anti-Corruption Policy, and shall periodically review and update relevant practices, procedures, and operational requirements to ensure alignment with changes in business conditions, rules, regulations, and applicable laws. Any act in violation of this policy, including acts that support, facilitate, or cooperate in corruption, shall be subject to disciplinary action in accordance with the Company's regulations. In addition, such acts may be subject to legal penalties if they constitute violations of applicable laws.

3. Roles and Responsibilities

3.1 The Board of Directors has the duty and responsibility to determine and approve the Anti-Corruption Policy and to oversee good corporate governance by ensuring that effective systems are in place to support anti-corruption efforts. This is to ensure that management recognizes the importance of anti-corruption and effectively implements the policy so that it becomes embedded as part of the Company's organizational culture.

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3.2 The Audit Committee has the duty and responsibility to review and ensure that the Company maintains adequate internal controls, including financial reporting and accounting systems, internal control systems, internal audit systems, and risk management systems. The Audit Committee shall also review compliance with the Anti-Corruption Policy, relevant rules, regulations, and applicable laws, and ensure that such systems and practices are in line with international standards, and are appropriate, robust, up-to-date, and effective.

3.3 The Chief Executive Officer, management committee, and executives have the duty and responsibility to establish appropriate systems, and to promote, support, and supervise implementation, to ensure that employees and all relevant parties comply with the Anti-Corruption Policy. They should also regularly review the adequacy and effectiveness of systems and measures to ensure alignment with changes in business operations, regulations, and legal requirements.

3.4 The Internal Audit function has the duty and responsibility to examine and review operations to ensure compliance with the Anti-Corruption Policy, guidelines, procedures, and applicable laws, and to ensure that appropriate and sufficient internal control systems are in place to address corruption-related risks. The results of such reviews shall be reported to the Audit Committee.

3.5 Directors, executives, and employees have the duty to strictly comply with the Anti-Corruption Policy and must not be involved in corruption in any form, whether directly or indirectly.

3.6 Subsidiaries, associates, and business representatives or agents over which the Company has control shall acknowledge and comply with the Company's Anti-Corruption Policy.

4. **Scope and Guidelines for Implementation**

The Company requires that directors, executives, and employees at all levels exercise due care and strictly comply with the following anti-corruption guidelines:

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- 4.1 Not to engage in or participate in corruption in any form, whether directly or indirectly.
- 4.2 To ensure that anti-corruption principles are effectively communicated at all levels, including directors, executives, and employees, and that all business processes are conducted in strict compliance with applicable laws. In the event of any operational error arising from negligence or lack of awareness, the persons responsible shall be subject to penalties as prescribed by law.
- 4.3 Directors, executives, and employees of the Company shall not commit or support corruption under any circumstances and shall strictly comply with the Company's anti-corruption measures.
- 4.4 Directors, executives, and employees have a duty to report to the Company any acts that may constitute corruption in connection with the Company by notifying their supervisors or responsible persons and shall cooperate fully in the verification and investigation of facts.
- 4.5 The Company shall ensure fairness and provide appropriate protection to whistleblowers who report corruption, as well as to persons who cooperate in reporting and in the investigation process relating to corruption.
- 4.6 Any person who commits corruption shall be subject to disciplinary action in accordance with the Company's regulations and may also be subject to legal penalties under applicable laws.
- 4.7 Directors, executives, and employees shall comply with the Company's corporate governance and anti-corruption policies. The Board of Directors has assigned management to communicate and implement anti-corruption measures throughout the organization.
- 4.8 Directors, executives, and employees are strictly prohibited from requesting or accepting money, assets, or any other benefits for themselves or others that may

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improperly influence the performance or non-performance of duties, or that may cause the Company to lose its legitimate interests. Likewise, directors, executives, and employees are prohibited from giving or offering money, assets, or any other benefits to external parties to induce such people to act or refrain from acting unlawfully or improperly in the performance of their duties, or in exchange for any undue or improper advantages, as follows:

- **Bribery (Giving and Receiving of Bribes)**

The giving or receiving of bribes in any form whatsoever in exchange for business advantages is strictly prohibited. No person shall authorize, instruct, or permit any other person to give or receive bribes on his or her behalf.

- **Business Relations and Procurement with Government Authorities**

The Company's operations and all dealings with government authorities shall be conducted in a transparent and honest manner and in strict compliance with applicable laws and regulations.

- **Gifts, Entertainment, and Other Benefits**

The giving or receiving of gifts, assets, entertainment, hospitality, or any other benefits from customers, business partners, or parties related to the Company shall be carried out strictly in accordance with the Company's rules and regulations.

- **Political Contributions**

The Company has a policy of not providing political contributions or support to political parties, political groups, or politicians, whether directly or indirectly.

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

The Company stipulates that the acceptance and provision of donations, charitable contributions, public benefit contributions, and sponsorships shall comply with the following requirements:

- (1) Such activities must be conducted transparently, lawfully, and in a manner consistent with moral and ethical standards and must not cause harm to society.
- (2) Such activities must not be related to, or used as a means or pretext for, bribery.
- (3) Such activities must comply with the Company's procedures for review and approval of charitable donations, public benefit contributions, or sponsorships.
- (4) In cases of doubt or where legal implications may arise, written advice shall be obtained from the Legal Department. For other matters of material significance, discretion shall be exercised by management.

4.9 To foster an organizational culture grounded in integrity, honesty, and fairness.

4.10 To provide training programs for employees throughout the organization to promote integrity and honesty in the performance of duties, and to ensure that the principles and ethical standards under the Company's good corporate governance policies are strictly applied in all operations across the organization.

4.11 To establish human resource management processes that reflect the Company's commitment to anti-corruption measures, covering recruitment and selection, training and development, performance evaluation, remuneration, and promotion.

4.12 To establish expenditure disbursement and procurement policies and procedures,

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including clearly defined approval authority limits, transaction purposes, and payees, supported by proper and sufficient documentation, and with appropriate authorization levels assigned at each level of authority.

- 4.13 To establish internal audit processes to provide reasonable assurance that the internal control system supports the achievement of the Company’s objectives, and to review the operations of all units to ensure compliance with applicable requirements and regulations, as well as to identify deficiencies and weaknesses, and to provide recommendations for improving the efficiency and effectiveness of operational systems in accordance with good corporate governance principles.
- 4.14 To cooperate with government authorities in requiring all relevant units that engage with the public sector to disclose statements of income and expenditure to the National Anti-Corruption Commission (“NACC”).
- 4.15 To designate the Company Secretary, the Internal Auditor, or any other person as deemed appropriate by the Audit Committee to perform duties related to the promotion and implementation of good corporate governance.

5. Whistleblowing and Complaint Reporting Channels for Corruption

The Company has established reporting channels for complaints, whistleblowing information, and feedback to enable employees and all stakeholders to submit complaints, report suspected corruption or provide opinions for the purpose of personnel development and improved management. Such reporting shall be handled in accordance with the Company’s Whistleblowing and Complaint Handling Policy on Misconduct and Corruption.



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This Anti-Corruption Policy was approved by the Board of Directors at Meeting No. 1/2024 held on 19 July 2024 and shall become effective as of 23 July 2024.

Announced on 23 July 2024

(Mr. Chawalit Tippawanich)

Chairman of the Board of Directors

Unique Plastic Industry Public Company Limited