

### charoong thai wire & cable public company limited. บริษัท จรุงไทยไวร์แอนด์เคเบิ๊ล จำกัด (มหาชน)



#### (Translation)

# Anti-Corruption Policy (Issue No. 1, Document No. 1/2025)

Charoong Thai Wire & Cable Public Company Limited ("the Company") conducts its business with adherence to its corporate values, business ethics, and good corporate governance principles, as well as compliance with all laws related to the prevention of fraud in all forms, both direct and indirect.

To ensure that Charoong Thai Wire & Cable Public Company Limited ("the Company") has a policy that defines responsibilities, operational guidelines, and appropriate requirements for preventing fraud in all of the Company's business activities, and to ensure that decisions and business operations that may involve fraud risks are carefully considered and carried out, the Company has established this Anti-Corruption Policy in writing for directors, executives, employees, and all relevant stakeholders to strictly comply with.

#### **Definitions**

**Fraud** refers to any act to seek benefits that are both undue and unlawful for oneself or others. This includes actions such as:

- Asset Misappropriation: The act of possessing assets belonging to others or in which others have ownership, and then dishonestly embezzling that assets for oneself or a third party.
- 2. Embezzlement: Deceiving others by presenting false information or concealing facts that should be disclosed in good faith, thereby obtaining assets or causing the deceived party or a third party to create, withdraw, or destroy any legal document.
- 3. Corruption: The act of soliciting, receiving, or agreeing to receive, demanding, or offering, or promising to give assets or any other benefit to a government official, government agency, official of a private organization, or private organization, to induce that person or organization to use their authority to perform or refrain from performing, expedite, or delay an act improperly within their duties, in order to obtain undue benefits, whether for oneself or others, or to maintain a business or inappropriate benefit.

Assets refer to money, goods, gifts, or any other benefits that can be calculated in monetary terms. This includes the use of special privileges that are not rights generally available to the public, such as discounts, services, or entertainment, and the payment of travel or tourism expenses, accommodation, meals, job placement, or anything else of a similar nature, whether provided in the form of cards, tickets, or other evidence, advance payments, or subsequent reimbursements.

Company refers to Charoong Thai Wire & Cable Public Company Limited.

**Personnel** refer to directors, executives, employees, and stakeholders of Charoong Thai Wire & Cable Public Company Limited.



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#### **Duties and Responsibilities**

#### 1. Board of Directors

- 1.1 Considers and approves the Anti-Corruption Policy.
- 1.2 Oversees the establishment of an effective anti-corruption support system.
- 1.3 Promotes and supports the development of a corporate culture of conducting businesswith integrity.

#### 2. Executives

- 2.1 Establishes rules, regulations, and measures for employees to follow, including disciplinary penalties.
- 2.2 Establishes a work system that promotes and supports anti-corruption, and reviews the suitability of the systems and measures.
- 2.3 Promotes and communicates this policy to all employees and relevant parties to ensure understanding.
- 2.4 Establishes channels for reporting concerns or complaints, including measures to protect whistleblowers.
- 2.5 Reports the results of operations to the responsible committee.
- 2.6 Reviews and updates various policies.

#### 3. Employees

Must understand and comply with the Anti-Corruption Policy and must not be involved in fraud, either directly or indirectly.

#### 4. Compliance Department

Regularly reviews, monitors, and considers compliance with the Anti-Corruption Policy on an annual basis and consistently reports the results of operations to the Board of Directors.

#### 5. Internal Audit Department

The Company assigns the Internal Audit Department to be responsible for reviewing and assessing the internal control system related to anti-corruption. The audit shall be conducted according to the annual audit plan approved by the Audit Committee, and the audit results shall be reported to the Audit Committee.

### Guidelines for the Implementation of the Anti-Corruption Policy

- 1. Procurement must be carried out in accordance with the criteria or procedures specified in the regulations, which must be fair and transparent in the process, considering reasonable pricing, quality, and after-sales service, as well as the standards that the seller of goods or services should possess. Furthermore, employees must not engage in businesses that may lead to personal gain by using their position in procurement, whether directly or indirectly, and must not use information obtained from procurement to seek personal gain or benefit others.
- 2. The Company has a no-facilitation payment policy in any form, whether direct or indirect, and will not engage in or accept any actions in exchange for facilitating business operations.



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- 3. Personnel must strictly comply with the Company's Anti-Corruption Policy and adhere to the code of conduct, not involve in any fraud of any kind, directly or indirectly. They shall be assured that they will not face any punishment, demotion or adverse effect as a result of declining any fraud although such act may have caused the Company to lose business opportunity.
  - a. Shall not give or accept any money, goods, gift, entertainment, service as well as benefit of any kind from the person with whom one has made contact either in government or private sector with an intention to direct such person to omit certain act in his/her or other person's operation.
  - b. Shall not act as an intermediary in offering any assets or benefits in the form of money, item, gift or any other benefits to business counterpart in exchange of undue privilege.
- 4. Personnel must not neglect or ignore any observed actions that may constitute corruption and must report them to executives or responsible individuals, and cooperate in the investigation of the facts.
- 5. Personnel must avoid conflicts of interest. If any action or behavior constitutes a conflict of interest with the Company, the personnel involved have a duty to report the conflict of interest through the designated channels.

#### Dissemination of Anti-Corruption Policy

To ensure that the Company's personnel are aware of the Anti-Corruption Policy, the Company will take the following actions:

- 1. Announce the Anti-Corruption Policy in a clearly visible location within the organization to ensure awareness among all personnel.
- 2. Disseminate the Anti-Corruption Policy through the Company's communication channels, such as the intranet, the Company's website, and the annual disclosure report (Form 56-1 One Report), etc.

#### Training

The Company conducts annual training for its employees by incorporating anticorruption policies into various training seminars and new employee orientations. This aims to enhance the knowledge and understanding of personnel, as well as to facilitate an annual review of the guidelines for implementing anti-corruption policies. This also ensures that personnel maintain integrity in their duties and are aware of the potential damages resulting from corruption to the Company.

#### Channel for whistleblowing and lodgment of complaint about corruption

It is acceptable to complain about any act that may constitute or raise suspicion of corruption, whether directly or indirectly, which involves the Company, via channels specified in this Policy. The complainant must provide details of the issue or complaint, along with evidence



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or adequate information for further investigation, and also inform their name, address, and contact number, by submitting the matter to the following channels:

- Complaints via Head of Internal Audit, by phone at Tel. 02-7456118-30 ext.129 or E-mail: thanapon.tun@ctw.co.th
- · Complaints via Head of Internal Audit, by mail:

Attn: Head of Internal Audit

Charoong Thai Wire & Cable Plc.

589/71 Central City Tower, 12A Fl., Debaratna Road,

North Bangna, Bangna, Bangkok, Thailand 10260

Whistleblowers or complainants will be protected, and their information will be kept confidential, without affecting their job position during the investigation process and after its completion.

#### Penalties

The Company prescribes penalties for directors, executives, employees, or any business-related stakeholders who violate or fail to comply with the Anti-Corruption Policy, or who engage in bribery. Such persons shall be subject to severe disciplinary actions, including removal from office for directors or termination of employment for executives and employees, as the case may be. In addition, personnel who fail to comply with this Policy shall be subject to disciplinary consideration as determined by the Company, and may also be subject to legal penalties if such actions are against the law.

#### Policy review and revision

The Company regularly reviews its anti-corruption policy at least every three years or when there are significant changes, to ensure compliance with changes in relevant laws, regulations, and rules, by proposing it to the Board of Directors for consideration and approval.

This Anti-Corruption Policy was approved by a resolution of the Board of Directors Meeting No. 3/2025, held on August 13, 2025. It is effective as of August 13, 2025.

(Mr. Chai Sophonpanich)

Chairman of the Board of Directors CHAROONG THAI WIRE & CABLE

PUBLIC COMPANY LIMITED