



## Compliance Policy

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# Compliance Policy

## 1. Principles and Rationale

As the company expands its business scope to meet market demands and achieve sustainable growth, it recognizes the importance of managing compliance risk. This ensures that business operations comply with laws, regulations, rules, measures, and practices enforced by governmental and regulatory bodies, as well as company traditions, professional standards, ethics, and company policies.

The Compliance Risk Management Policy is established to provide standard practices for preventing compliance risks that may arise from non-compliance with applicable laws, regulations, rules, measures, and practices. It supports an effective enterprise risk management system, reducing potential financial damage or reputational harm. Directors, executives, and employees must understand and acknowledge the importance of adhering to their duties with honesty, integrity, and transparency, based on good professional standards and ethics, and in accordance with company policies. This policy covers overall governance for the company and its business group to ensure uniform standards across the group.

## 2. Objectives

**2.1** To promote an effective compliance risk management system that can prevent risks arising from non-compliance, which may cause financial damage or reputational harm to the company.

**2.2** To ensure that directors, executives, and employees are aware of and understand the importance of complying with regulations and their responsibilities in this regard.

**2.3** To ensure that the company's compliance aligns with international standards and regulatory practices.

## 3. Definitions

- **"Regulations"**: Laws, regulations, rules, measures, and practices applicable to the company and its business group, including traditions, professional standards, ethics, and company policies.

- **"Compliance"**: The adherence of directors, executives, and employees to laws, regulations, rules, measures, and practices applicable to the company and its business group, including traditions, professional standards, ethics, and company policies.
- **"Operational Oversight"**: Ensuring that the company and its business group, including directors, executives, and employees, comply with regulations to prevent non-compliance and mitigate potential impacts.
- **"Compliance Risk"**: Risks arising from non-compliance with laws, regulations, rules, measures, and practices applicable to the company and its business group, including traditions, professional standards, ethics, and company policies, which may cause financial damage or reputational harm, or lead to regulatory intervention.
- **"Executives"**: Employees of the company and its business group responsible for setting departmental policies, overseeing policy compliance, and supporting, allocating, and reviewing departmental resources.

#### 4. Scope of the Compliance Oversight Policy

The Compliance Oversight Policy covers the oversight of operations by the Board of Directors, subcommittees, executives at all levels, and all employees of the company. They must adhere to this policy to ensure business operations comply with laws, regulations, rules, measures, and practices enforced by governmental and regulatory bodies, as well as company traditions, professional standards, ethics, and company policies. The policy is under the oversight framework of the Risk Management Committee and includes the following scope:

**4.1** Directors, executives, and all employees must strictly comply with regulations related to the company's business operations, maintaining honesty, integrity, social and environmental responsibility, and anti-corruption practices to ensure sustainable and ethical business operations.

**4.2** Directors and executives support compliance by providing necessary personnel and resources, fostering a good awareness, promoting compliance, and encouraging all employees to value and understand the importance of compliance. They must also set a good example and establish appropriate measures to ensure this policy is upheld and practiced by all levels of employees.

**4.3** Compliance is the responsibility of the Board of Directors, executives, and all employees. Employees must study, understand, and recognize the importance of compliance under the

guidance of supervisors and compliance officers, striving to follow the company's policies to align operations with good corporate governance.

**4.4** The company establishes an independent compliance oversight unit, free from conflicts of interest, with a clear organizational structure to manage compliance risk.

**4.5** The company prepares compliance-related reports according to regulatory requirements, such as those from the Bank of Thailand, the Securities and Exchange Commission, and the Stock Exchange of Thailand.

**4.6** The compliance oversight unit reports quarterly to the Risk Management Committee on the company's compliance status, significant factors and issues, and necessary improvements to align the company's compliance with regulatory standards.

**4.7** All company transactions must align with good corporate governance and the principles outlined in this policy, including:

**4.7.1** Commitment to anti-corruption and anti-bribery laws, considering bribery of government officials, private sector officials, or other related persons as illegal and improper.

**4.7.2** Respect and adherence to human rights laws, emphasizing the dignity, rights, freedoms, and equality of individuals.

**4.7.3** Commitment to protecting and safeguarding the company's intellectual property from infringement or unauthorized use, and respecting others' intellectual property rights.

**4.7.4** Preventing the company from being used for money laundering or financing terrorism, with business practices emphasizing vigilance, reporting illegal activities, and ensuring accurate financial and asset records as required by law.

**4.7.5** Prioritizing the confidentiality of information held by the company, adhering to legal and ethical business principles, and not disclosing or using such information for personal gain, causing harm to others or the company, unless authorized by the information owner or through a lawful relationship.

## 5. Roles, Duties, and Responsibilities of Involved Parties

**5.1 Board of Directors:** Plays a crucial role in supporting the company's compliance with laws, regulations, rules, measures, and practices enforced by governmental and regulatory bodies. They approve the Compliance Policy and delegate the Risk Management Committee to oversee policy-level compliance.

**5.2 Risk Management Committee:** Responsible for overseeing compliance risk management, assessing the effectiveness and adequacy of compliance risk management as necessary, and providing recommendations to the Board of Directors on necessary actions to prevent or mitigate risks.

**5.3 Audit Committee:** Responsible for reviewing the company's compliance control and monitoring processes, assessing the adequacy and effectiveness of the internal control system, and reviewing compliance audit results, compliance oversight measures, and compliance risk management.

**5.4 Executives** are responsible for implementing policies concretely and continuously. They must understand the governance policies, practices, and regulations related to their operations. Each executive is responsible for managing compliance risks within their respective departments as follows:

**5.4.1** Act as a role model in compliance and encourage employees under their supervision to recognize and prioritize compliance, fostering a culture of compliance within the company.

**5.4.2** Facilitate communication, raise awareness, promote compliance, and encourage employees to value and understand the importance of compliance.

**5.4.3** Establish guidelines and supervise employees to ensure they understand and consistently comply with regulations.

**5.4.4** Report any non-compliance found within their department to the compliance department immediately upon discovery and inform the next level of management promptly to find appropriate solutions.

**5.4.5** Cooperate with the compliance department to ensure that operations align with official regulations.

**5.5 The Head of Compliance** is responsible for overseeing compliance as follows:

**5.5.1** Manage compliance risks by developing a Compliance Program, assessing compliance risks, and reporting the results to the Risk Management Committee quarterly.

**5.5.2** Report significant non-compliance incidents to the Risk Management Committee immediately, including non-compliance by the board and senior executives from the level of Assistant Managing Director or equivalent and above, and any financial damage exceeding the company's acceptable threshold, with independent reporting.

**5.6 The Risk Management and Compliance Department** is an independent unit responsible for overseeing compliance, free from conflicts of interest. It manages compliance risks by providing advice, monitoring, analyzing, evaluating, implementing corrective actions, disseminating knowledge, and raising awareness about governance. It also controls documents and information related to compliance operations, regularly reviews compliance activities, and reports to decision-makers and stakeholders to ensure effective and efficient compliance management, supporting the governance system to ensure the company's business operations comply with relevant regulations accurately and comprehensively.

**5.7 Various departments** must collect information and report any non-compliance or avoidance of regulations to the Risk Management and Compliance Department. They must also cooperate with the department to support problem-solving, prevention, and management of potential compliance risks, and improve internal governance.

**5.8 All employees** must adhere to this governance policy, understand the regulations related to the company's business, and act with diligence and caution. If any non-compliance or avoidance of regulations is found, employees must report it to their supervisors or responsible persons, or through designated channels such as the Whistle Blowing System. Employees must cooperate in fact-finding investigations, and the company will ensure fairness and protection for those who report non-compliance or cooperate in reporting, according to the Whistle Blowing Policy.

## 6. Review of Governance Policy

The company mandates a review of the governance policy to ensure it is up-to-date and aligned with changes in laws, regulations, and rules affecting the company's operations. This review occurs when there are significant legal changes or at least once a year to adapt to changing circumstances that may significantly impact governance. The Risk Management and Compliance Department is responsible for this review and presenting it to the Risk Management Committee for approval before submitting it to the Board of Directors for final approval.

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