

## Saksiam Leasing Public Company Limited Anti-Corruption Policy and Guidelines

Saksiam Leasing Public Company Limited and its subsidiaries (the “Company”) aim to conduct business with integrity, transparency, and in accordance with Good Corporate Governance, recognizing that such integrity is a crucial factor and a good practice principle under the Business Code of Conduct. The Company is committed to opposing all forms of corruption to prevent actions that may hinder the development of the business system and the free market system. This serves as a good practice guideline for the Company’s directors, executives, and employees in conducting business fairly toward all internal and external related parties. It also includes the treatment of stakeholders, namely employees, shareholders, customers, business partners/creditors, competitors, and society as a whole, to conduct business together fairly. This is to build continuous and sustainable stability and growth for the organization and shareholders, as well as to establish a clean and transparent business standard.

Therefore, the Company has established this Anti-Corruption Policy and Guidelines (the “Policy”), which serves as an extension of the Code of Conduct and Business Ethics set by the Company. Should any prior announcement conflict with this document, this announcement shall prevail.

### Objectives of this Policy

1. To demonstrate the commitment to establishing guidelines for preventing and combating corruption within the Company.
2. To establish rules and practical guidelines for directors, executives, and employees to adhere to in combating corruption, as well as to define measures to prevent the violation of such rules or guidelines.
3. To establish auditing and oversight criteria to ensure compliance with this Policy.
4. To encourage the Company’s personnel to report any observed corruption through the designated coordination channels.

### Scope of this Policy

This Policy applies to directors, executives, employees, and any persons related to or acting on behalf of the Company.

#### 1. Definitions under this Policy

- 1.1 Corruption means bribery, using one's position, duties, and/or utilizing information obtained from performing company duties to engage in any act that provides benefits to oneself, associates, and/or others to improperly acquire assets, inappropriate business benefits, or any other undue benefits for oneself, either directly or indirectly. It also includes any actions that conflict with or contradict

the Company's business ethics, except in cases permitted by laws, regulations, notifications, local customs, or trade traditions. Corruption can take many forms and includes:

- (1) Supporting political activities.
  - (2) Practices regarding the giving of cash or cash equivalents, giving and receiving donations, and sponsorships.
  - (3) Facilitation payments and bribery to government officials and between private entities.
  - (4) Giving and receiving gifts, souvenirs, entertainment, and hospitality.
  - (5) Conflict of interest.
  - (6) Hiring government employees/officials.
  - (7) Procurement.
- 1.2 Supporting Political Activities means providing financial or non-financial support to political parties, politicians, politically exposed persons, or political candidates, as well as supporting political activities, directly or indirectly. Non-financial support includes assets, items, rights, or any other benefits provided as assistance, support, or for other benefits, such as loaning or donating equipment, providing free technological services, and employees volunteering their working hours.
- 1.3 Giving Cash or Cash Equivalents, Giving and Receiving Donations, and Sponsorships means the reasonable giving/receiving by individuals or juristic persons from customers, business partners, and business allies. The objectives must be to support business operations, promote the brand or the Company's reputation, support charity, and/or provide relief for a specific cause that is beneficial for building commercial credibility, strengthening business relationships, and aligning with propriety, transparency, and good corporate governance. Donations and sponsorships can take many forms, including offering cash, services, goods, or used items, as well as disaster relief, humanitarian aid, developmental support, and medical care necessities.
- 1.4 E-Donation means the electronic donation system developed by the Revenue Department to accommodate donation data for educational institutions, religious places, hospitals, public charitable organizations, and other receiving units legally eligible for tax deduction claims. This facilitates donors in utilizing tax benefits without needing to keep donation evidence to present to company officers.
- 1.5 Facilitation Payments and Bribery to Government Officials and Between Private Entities means small, unofficial payments made to and received from government officials or private entities solely to ensure that the official proceeds with a process or to expedite a process. Such processes must not rely on the official's discretion and must be lawful duties of that official, as well as rights the juristic person is

already legally entitled to, such as applying for licenses, requesting certificates, receiving public services, and receiving services from private entities.

- 1.6 Giving and Receiving Gifts, Souvenirs, Entertainment, and Hospitality means expenses incurred during the Company's activities to build good relationships or, on some occasions, as an expression of social etiquette. Entertainment expenses may include accommodation and transportation for site visits or study tours, and food/beverages. Gifts may take various forms, whether money, items, services, or vouchers. These expenses may be considered bribes if given to induce a government official to act unlawfully. The value of entertainment and gifts that the Company can provide to government officials must genuinely align with business customs in good faith.
- 1.7 Conflict of Interest means any activity where personal needs or the needs of related persons, whether by blood or otherwise, influence decision-making, or may hinder or obstruct the best interests of the Company.
- 1.8 Hiring Government Employees/Officials means situations where a person who is or was a government official, politician, or advisor to a government agency is employed by the Company and may use their connections or inside information to benefit the Company, or create a conflict of interest in performing their duties for the government agency or regulatory body overseeing the Company. The intent of such action is to gain an unfair business advantage or to influence policies benefiting the Company for which the former official works.
- 1.9 Board of Directors means individuals holding the position of the Company's Board of Directors according to the announcement.
- 1.10 Executives means executives at all levels of the Company, comprising the Executive Committee, Managing Director, Deputy Managing Director, Assistant Managing Director, Business Zone Manager, Department Manager, Assistant Department Manager, Department Head, and Branch Manager.

## 2. Guidelines for Prevention and Anti-Corruption

### 2.1 Supporting Political Activities

#### *Guidelines/Procedures:*

Assisting, supporting, or representing political parties in various public activities, whether financially or in any other form, must not cause others to perceive that the Company is involved with or favors any particular political side, political party, or person with political power, directly or indirectly. The Company maintains a stance of democratic political neutrality.

- (1) Should the Company wish to provide political support to promote democracy, such support must not violate relevant laws and must not be made with the expectation of receiving special reciprocal treatment.

- (2) Directors, executives, and employees have legal political rights and freedoms but shall not take any actions that cause the Company to lose its neutrality or suffer damages from political involvement.
- (3) Directors, executives, and employees shall not conduct political activities within the Company or use any of the Company's resources for such purposes.

*Control and Audit Measures:*

To support democracy, a request memo must be prepared specifying the recipient's name and the objective of the support, attaching all supporting documents, and submitted to the Executive Committee for approval.

2.2 Giving Cash or Cash Equivalents, Giving and Receiving Donations, and Sponsorships  
*Guidelines/Procedures:*

- (1) Budget Approval: The Accounting Department shall compile and summarize donation or sponsorship expenses according to the objectives of various departments ( e. g. , Marketing, HR, and departments responsible for donation/sponsorship projects) to request approval for the annual charitable donation budget. Charitable donations must not exceed the limit legally allowed as a tax-deductible expense, which is 2% of the net profit according to Section 65 Tri (3) of the Revenue Code.
- (2) Giving Cash or Cash Equivalents, Giving and Receiving Donations, and Sponsorships: The HR Department is responsible for receiving requests. For in-kind or asset donations, the Donation or Sponsorship Approval Form (Attachment 1) must be used. Documents from requesting schools, temples, government agencies, and public charitable organizations must be verified as follows:
  - (2.1) The HR Department verifies the credibility and existence of the requesting organization and the supporting documents:
    - (a) Request letter specifying the items, quantities, or amount, and the purpose.
    - (b) Establishment documents of the requesting organization (if any) or verification of the entity on the list of institutions eligible for tax deductions on the website.
    - (c) Photos, blueprints, or building plans where the donated items will be used.
    - (d) Verification that the requested quantity is reasonable and factual for the project.
    - (e) Prioritize schools, temples, charities, government agencies, and communities located around the Company and its branches.

- (2.2) For in-kind donations, the HR Department sends the approved list (per 2.1) specifying the types and quantities to the Procurement Department to check available, ready-to-use inventory within 1 week.
- (2.3) The Accounting Department checks the budget and cost of the items to record them as public charitable donation expenses for tax deduction purposes, including the VAT burden the Company must absorb, and submits it to the authorized approver within the limit approved by the Board of Directors.
- (2.4) For cash donations, after verifying documents (per 2.1), payments must be made payable only in the name of the requesting organization.
- (2.5) For donations of supplies, gifts, or food purchased for customary community activities (e.g., Buddhist Lent, Children's Day), procedures outlined in the Authority Manual must be followed.
- (2.6) The secretary of the department responsible for the project shall compile donation documents for each period and report them at the department's next project meeting for acknowledgment.

*Control and Audit Measures:*

- (1) Approval Authority: The authority to approve charitable donations complies with the regulations and approval limits set by the Board of Directors currently in effect.
- (2) Delivery of Donated Items: The HR Department coordinates the delivery with the requesting party, arranging a handover ceremony with photos as evidence. For rejected requests, the HR Department will notify the requester of the reasons.
- (3) Document Submission: The HR Department must obtain donation receipts and submit all original documents to the Accounting Department as evidence for Revenue Department audits, including:
  - (a) Request letter.
  - (b) Photos, blueprints, or plans (if applicable).
  - (c) Establishment documents (if any).
  - (d) Thank-you letter, certificate of appreciation, or receipt.
  - (e) E-Donation receipt (essential) for tax-exempt cash/asset donations to verify accuracy.
  - (f) Photos of the handover, community activities, and completed structures (if any).
- (4) Review: The HR Department verifies post-donation that the cash or items were used for the requested objectives to inform future donation decisions. The overseeing Internal Audit Department shall review charitable donations according to the annual audit plan and strictly follow this directive. If any

irregularities or potential fraud are found, they must be reported to the Audit Committee and the Chairman of the Board immediately.

### 2.3 Facilitation Payments and Bribery to Government Officials and Between Private Entities

#### *Guidelines/Procedures:*

The Company has no policy to make facilitation payments or pay bribes to government officials or between private entities in any form, directly or indirectly. The Company will not take any action or accept any action in exchange for business facilitation. Facilitation payments that could lead to corruption are strictly prohibited.

#### *Control and Audit Measures:*

The Company conducts audits to ensure no facilitation payments or bribes are paid to government officials or private entities as a channel for corruption.

### 2.4 Giving and Receiving Gifts, Souvenirs, Entertainment, and Hospitality

#### *Guidelines/Procedures:*

- (1) The Company allows the payment and receipt of money related to gifts, souvenirs, entertainment, and hospitality that are clear, fall under normal business practices, do not negatively impact the Company's operations, and are not channels for corruption risk. A Gift Receipt Report Form (Attachment 2) must be followed.
- (2) The Company allows the Managing Director, executives, and employees to give or receive gifts, souvenirs, and entertainment to or from any person, provided it complies with the specified conditions: it must be given on behalf of the Company without obligations or creating a sense of obligation that requires corrupt reciprocity. It is permissible if it aligns with normal customary practices, provided it complies with the Company's criteria and Code of Conduct.

#### *Control and Audit Measures:*

The Company conducts audits to ensure the giving and receiving of gifts, souvenirs, entertainment, and hospitality are not used as channels for corruption.

### 2.5 Conflict of Interest

#### *Guidelines/Procedures:*

- (1) Refrain from engaging in businesses that compete with the Company or its subsidiaries, whether for personal benefit or others, which may cause direct or indirect damage to the Company. Also, refrain from becoming a partner, a decision-making shareholder, a director, or an executive in a competing or similar business to the Company or its subsidiaries.
- (2) Must report any conflicts of interest that may arise with the Company or its subsidiaries, such as holding any position in a partner company doing business

with the Company or a customer of the Company. This must be reported to the Company immediately.

- (3) Do not seek benefits for oneself or others by using the confidential information of the Company or its subsidiaries.
- (4) Carefully consider the appropriateness of all connected transactions, setting prices and conditions as if they were transactions with third parties (Arm's Length Basis).

*Control and Audit Measures:*

The Company conducts audits to ensure there are no conflicts of interest serving as channels for corruption.

2.6 Hiring Government Employees/Officials

*Guidelines/Procedures:*

The Company has no policy to hire government employees to hold positions as directors, executives, employees, advisors, or experts, unless necessary during specific situations, where the Board of Directors will determine appropriate selection criteria.

*Control and Audit Measures:*

The Company discloses information regarding directors, advisors, executives, employees who perform duties related to government policy work, including the reasons for holding the position or performing the duty, published in company documents to ensure transparency.

2.7 Procurement

*Guidelines/Procedures:*

The Company has clear, written procurement procedures and practices, an approval process for purchase requests and orders within the Company's authority limits, transparent and auditable vendor/service provider price comparisons, goods receiving, and accounts payable setting. It also includes regular vendor/service provider evaluation processes.

*Control and Audit Measures:*

The Company has no policy to solicit, receive, offer, or give any money or benefits from/to vendors or service providers in exchange for procurement approval. Such actions could result in the Company receiving substandard, non-compliant, or poor-quality goods, assets, or services, impacting the Company's product and service quality. Therefore, if anyone witnesses the solicitation, receipt, offer, or giving of such money or benefits, they must immediately inform their supervisor to stop the incident or find solutions to mitigate any potential damages to both the Company and the contracting party.

## 2.8 Subsidiaries, Business Agents, and Business Partners

### *Guidelines/Procedures:*

The Company is committed to operating with integrity, legality, and good corporate governance. It recognizes the importance of procurement processes that support the Company's operations by building trust, transparency, and fairness within the management framework. The Company aims to encourage all employees and business partners to follow these guidelines, explaining the Company's expectations regarding business integrity and ethics, labor and human rights practices, occupational health and safety, and environmental management. The Company will assist, promote, and support partners in applying these principles appropriately.

### *Control and Communication Measures:*

The Company will communicate the Anti-Corruption Policy and Guidelines to subsidiaries, associated companies, controlled entities, and business agents to ensure compliance, defining clear communication procedures. The Company will explain anti-corruption measures through policy explanation letters, circulars, E-mails, events, and/or seminars.

### *Business Code of Conduct for Subsidiaries, Business Agents, and Partners:*

The Company requires subsidiaries, business agents, and partners to adhere to the following:

- (1) Must possess integrity, not tolerate corruption, embezzlement, offering, accepting bribes, or agreeing to accept gifts/rewards to gain special privileges from the Company. Partners must implement preventive measures, including training, in alignment with the Company's anti-corruption policy.
- (2) Must avoid conflicts of interest, including the intent to have a conflict of interest, between the partner's employees and the Company.
- (3) Must avoid intellectual property infringement and comply with the laws and regulations of the countries where they operate.
- (4) Must maintain the confidentiality of the Company's information; employees must not disclose information for personal benefit.
- (5) Must uphold the Company's reputation, participate in development, and demonstrate social responsibility.
- (6) Must oppose trade monopolies and promote fair business competition.
- (7) Must maintain accurate and complete business-related accounting records.
- (8) Must conduct business with fair competition, oppose monopolies, and communicate Code of Conduct requirements to their own supply chain, monitoring compliance with the Code and relevant laws and regulations.

### 3. Duties and Responsibilities of Relevant Persons

- 3.1 The Board of Directors oversees and approves the Anti-Corruption Policy and Guidelines, translating policies and measures into actual practice in accordance with the Thai Private Sector Collective Action Against Corruption (Thai CAC) guidelines. This includes addressing issues arising from policy compliance. The policy should be reviewed and updated to comply with relevant regulations. The Board assigns the Internal Audit Department to evaluate the adequacy and appropriateness of the defined policies and measures, monitor compliance, and report to the Audit Committee, who then reports the policy and risk assessment results to the Board of Directors for acknowledgment.
- 3.2 The Internal Audit Department evaluates the adequacy and appropriateness of financial reporting and provides assurance that employees practically apply the policy in anti-corruption processes and other related processes in accordance with this Policy and Guidelines.
- 3.3 The Company's executives have the duty to communicate with subordinates to ensure understanding and strict compliance with this Policy, as well as to consistently promote awareness.
- 3.4 Directors, executives, and employees must perform their duties in accordance with the guidelines specified in this Policy without exception. Individuals at all levels are prohibited from demanding, executing, or accepting corruption for the benefit of themselves, their families, friends, and acquaintances. If any violation is observed, it must be reported to supervisors as soon as possible via the reporting channels designated in this Policy.

### 4. Policies Supporting Anti-Corruption Measures

- 4.1 Risk Management and Assessment
  - (1) The Company's executives must understand the potential risks of bribery and corruption and communicate them to employees at all levels to ensure understanding and cooperation in effectively managing such risks.
  - (2) The Company will conduct a risk assessment of transactions that may involve processes prone to bribery and corruption. The overall risk management policy will be reviewed at least once a year, including reviewing the existing risk management measures to ensure they are appropriate to prevent or reduce risks to an acceptable level.
- 4.2 Internal Control
  - (1) The Company requires an internal control system to manage corruption, covering financial aspects, the operation of accounting and data collection processes, sales, marketing, procurement, and other processes that may be related to corruption.

- (2) The internal control system is a process designed to provide reasonable assurance regarding the effectiveness and reliability of operations, and compliance with the Company's anti-corruption rules and policies. This includes systematic evaluations comprising the Control Environment, Risk Assessment, Control Activities, Information & Communication, and Monitoring Activities, continuously reporting the internal control assessment results to the Audit Committee.

#### 4.3 Accounting Audit, Record Keeping, and Financial Reporting

- (1) The Company has a process for auditing accounting reports with appropriate approval prior to recording them into the system. Audits adhere to Company policies, official regulations, relevant laws, contracts or agreements, and must comply appropriately with accounting standards and policies.
- (2) Operating and capital expenses must have accurate and complete supporting evidence and must be approved according to the authority limits specified in the respective expense policies.
- (3) The Company requires a financial reporting mechanism that accurately, truthfully, and reliably reflects the financial status, disclosing all material information correctly and completely.

#### 4.4 Human Resources Management

The Company will integrate this Policy as part of its human resources management discipline, covering directors, executives, and employees, and encompassing all HR processes affecting anti-corruption measures as follows:

- (1) Individuals who comply with anti-corruption measures demonstrating participatory commitment will be positively considered during selection, performance evaluations, compensation, and promotions compared to others when opportunities arise.
- (2) The Company assures that individuals who comply with anti-corruption measures will not be demoted, punished, or suffer negative consequences for refusing corruption, even if such refusal results in a loss of business opportunity for the Company. The Company believes this policy will sustainably create long-term value for its employees. Furthermore, the Company will not tolerate any threats, harassment, or retaliation against directors, executives, and employees who intend to comply with this Policy.
- (3) The Company will communicate this Anti-Corruption Policy and Guidelines to all relevant persons upon its announcement, at the beginning of business relationships, and subsequently as appropriate, via the Intranet and E-mail. The overall policy and recent updates can also be found on the Company's website ( <https://saksiam.com> ) to ensure widespread awareness and understanding.

- (4) The Company provides orientation for all new directors, executives, and employees to ensure understanding of anti-corruption measures, Company expectations, and penalties for non-compliance.
- (5) All directors, executives, and employees will receive continuous training or updates on anti-corruption measures to remain aware of this Policy and achieve a true understanding, particularly those involved in transactions with corruption risks.

## **5. Development of Anti-Corruption Measures**

The Company requires its anti-corruption measures to comply with relevant laws and moral principles. A risk assessment will be conducted for activities related to or at risk of corruption, which will be compiled into a practical guideline manual for relevant parties. Should any significant changes occur, the Company will develop and update this Policy.

## **6. Cases of Doubt Regarding Corruption**

If any director, executive, or employee has doubts, questions, or is unsure whether an action constitutes corruption, they should consult their direct supervisor or report the concern/complaint through the channels designated by the Company.

## **7. Whistleblowing/Complaints and Protection Measures for Whistleblowers**

- (1) If directors, executives, or employees have doubts or evidence that any director, executive, employee, or person acting on behalf of the Company is involved in corruption, they must report or file a complaint to the Company via the following channels:
  - (a) By Telephone:  
Contact: Head of Internal Audit Department  
Tel: 095-321-2277, 087-201-6051
  - (b) By Mail:  
Contact: Head of Internal Audit Department  
Address: Saksiam Leasing Public Company Limited, No. 49/47, Jesadabodin Road, Tha It Subdistrict, Mueang Uttaradit District, Uttaradit Province 53000
  - (c) By E-mail:  
Contact: Internal Audit Department | E-mail: [internal\\_audit@saksiam.co.th](mailto:internal_audit@saksiam.co.th)  
Contact: Managing Director | E-mail: [siwaphong.boonsalee@saksiam.co.th](mailto:siwaphong.boonsalee@saksiam.co.th)
  - (d) Via Company Website:  
Topic: File a Complaint | URL: <https://saksiam.com/contact>  
Administrator: Internal Audit Department
- (2) In case of complaints involving executive-level employees (Assistant Managing Director, Regional Manager, Deputy Managing Director, or Managing Director):  
Contact: Chairman of the Board | E-mail: [supot.singha@gmail.com](mailto:supot.singha@gmail.com)

- (3) The Company will keep the whistleblower's information confidential. The Company will use this reported information for internal management and compliance oversight, or disclose it pursuant to lawful orders, court orders, and/or orders from the SEC, SET, government agencies, and/or relevant regulatory bodies.
- (4) Whistleblowers or complainants will be taken seriously and protected from fear of abuse of supervisory power or unfair treatment.
- (5) Whistleblowers must act in good faith. If the Company finds that a report was made in bad faith or with the intent to harass, damage reputation, insult, provoke hatred, or cause embarrassment to others, the Company will take appropriate action.
- (6) If corruption is found to have occurred, the Company will review its controls to address and close the loopholes that caused the corruption, preventing recurrence.

## **8. Related Policies and Regulations**

Directors, executives, and employees must read and understand the Company's other policies and manuals, including:

- (1) Code of Conduct and Business Ethics
- (2) Company Announcement Re: Penalties for Internal Fraud
- (3) Company Announcement Re: Fraud Prevention

## **9. Penalties**

- (1) Violation or non-compliance with this Policy by any director, executive, or employee will be investigated under the Company's disciplinary process and may result in a warning, probation, termination, or dismissal if deemed necessary by the Company, depending on the provable offense. It may also lead to civil and criminal legal action if the violation is found to be intentional.
- (2) If facts reveal that any related party or stakeholder of the Company fails to comply with the guidelines in this Policy, the Company may consider terminating transactions with that person as deemed appropriate.

## **10. Monitoring and Review**

- (1) The Company will continuously review this Policy on a regular basis (at least once a year), taking into account changing situations and risks. It will be proposed to the Audit Committee and approved by the Board of Directors to evaluate the adequacy and effectiveness of the anti-corruption measures. The results and recommendations regarding necessary practices to mitigate risks will be reported to the Board of Directors for acknowledgment.
- (2) The Internal Audit Department is assigned to monitor actual implementation, regularly audit the internal control systems of various processes, and urgently

report identified issues to ensure the internal control system is effective in combating corruption. Audit results will be discussed with relevant persons to find appropriate corrective actions and subsequently reported to top management and the Audit Committee.

**This Anti-Corruption Policy and Guidelines was reviewed and approved by the Board of Directors at Meeting No. 8/2025 on November 11, 2025.**

Announced on November 16, 2025.

(Mr. Siwaphong Boonsalee)

Managing Director