Anti-Corruption Policy

Revised Edition 1

Infraset Public Company Limited places great importance on conducting business with prudence in matters concerning corruption, adhering to the principles of good corporate governance, and striving for transparency within the framework of good corporate governance. The company also prioritizes social responsibility, environmental protection, and the well-being of all stakeholders. To demonstrate its commitment to combating all forms of corruption, the company has established a written "Anti-Corruption Policy and Related Guidelines" to serve as a strict guideline for all directors, executives, and employees without exception.

Definitions

Company	means	Infraset Public Company Limited.
Subsidiary	means	A subsidiary or associated company of Infraset Public Company Limited.
Director	means	A director of the company.
Executive	means	An executive of the company from the manager level and above.
Employee	means	A permanent employee, a daily employee, or a contract employee who receives wages from the company.
Fraud	means	Any activity that relies on deception to obtain undue benefit. Fraud is considered a crime when there is a deliberate distortion or concealment of facts to disadvantage others. Corruption can be divided into three main groups: Corruption, Misappropriation, and Financial Statement Fraud.

Corruption	means	The abuse of power to obtain undue benefits including: Giving or receiving bribes in any form, by offering, promising, demanding, or receiving money, property, or any other improper benefit to government officials, government agencies, private entities, or related parties, directly or indirectly, to induce them to perform or refrain from performing their duties, or to obtain or maintain improper business benefits.
Business partners	means	Refer to joint ventures, investors, trading partners customers, and other related business parties.
Bribery	means	The offering or acceptance of money, property or other benefits, such as cash, gifts, or valuable items, in order to influence or exchange decisions or behaviors that unfairly benefit the giver of the bribe.
Gifts	means	Any items that a company receives or gives to external parties, such as suppliers, service providers, government officials, financial institutions, state enterprises, government organizations, other agencies, or the general public, in order to build relationships within the scope of what is permissible at a reasonable value and in accordance with customs traditions and relevant laws, such as cash, gift voucher, entertainment, travel expense, etc.
Donations	means	The giving of money, property, or items to agencies or organizations that operate for the public good with the purpose of alleviating public suffering and supporting other activities that benefit the public as part of social responsibility activities and without expecting business returns or personal benefits.
Sponsorships	means	The giving of money or property to individuals organizations or activities with the aim of marketing benefits or strengthening business relationships without any hidden agenda

		expectation of return or aiming to create a business advantage.
Political Contributions	means	Financial support or other forms of assistance. Both of directly and indirectly, to support political activities, political parties, politicians, or political figures, with the hope of obtaining preferential treatment, special privileges, or business advantages.
Facilitation Payments	means	Small amounts of money informally paid to government officials to ensure that procedures are followed or to expedite processes without requiring the official's discretion and are deemed to be within the official's duties and rights such as those granted by law to legal entities, like applying for licenses, certifications and receiving public services.
Conflict of Interest	means	Any action that creates a conflict of interest with a group of companies, whether arising from contact with business associates of the group or from using opportunities or information gained as an employee to seek personal gain and conduct business that competes with the group or engage in other work outside of the group's responsibilities, which may affect decision-making or the performance of assigned duties, thereby impacting the interests of the organization or the public.
Revolving Door	means	Employment of government personnel refers to individuals from the public sector working in the private sector, or individuals from the private sector working in the public sector. This creates a risk of corruption due to conflicts of interest between individuals with roles in both organizations. This can lead to biased oversight by government officials or private sector personnel attempting to push government policies to benefit their own organizations.

Government Officials	means	Political office holders, civil servants, or local government employees holding positions or salaried employees, or individuals working in state enterprises, organizations, or government agencies, etc.
Entertainment Hospitality	means	The provision of food, beverages, services, and related expenses for entertainment and welcome services paid to individuals and groups without expecting compensation or creating a business advantage.
Asset Misappropriation	means	Individuals within an organization misusing or misappropriating organizational assets for personal gain, such as false expense claims, theft of cash or assets, or forgery of documents.
Financial Statement Fraud	means	An organization intentionally distorting financial statements or withholding or omitting disclosure of material information in financial reports with the intention of misleading or deceiving users of financial statements about the financial status, performance, or stability of the organization, such as recording unrealized revenue or recognizing revenue prematurely, underreporting expenses, or increasing the value of assets without adequate supporting evidence.

Roles, Duties, and Responsibilities:

Directors, executives, and employees of the Company and its subsidiaries must not solicit, engage in, or accept any form of corruption, directly or indirectly, for their own benefit or the benefit of others, whether through offering, promising, soliciting, demanding, giving or accepting bribes, or any behavior suggestive of corruption.

- **The Board of Directors** is responsible for establishing anti-corruption policies and practices, monitoring compliance with these policies and measures, and promoting an anti-corruption corporate culture to ensure the organization operates transparently and responsibly towards society.

- **The Audit Committee** is responsible for reviewing internal control systems, financial and accounting reports, internal audits and risk management systems to ensure compliance with international standards and effective implementation. This includes providing advice and monitoring strict adherence to anti-corruption policy and guidelines.
- **The Executive Committee** is responsible for promoting, supporting, and overseeing employee compliance with anti-corruption policy and practices, as well as establishing appropriate systems and measures tailored to the business model, environment, and corporate culture. To be consistent with anti-corruption policy and guidelines.
- **The Risk Management Working Group** is responsible for assessing and reviewing corruption risk assessment results, including corruption risk management plans and determining appropriate internal control systems at an acceptable level to ensure effectiveness and compliance with policy.
- **The Internal Audit Unit** is an independent external audit unit under the supervision of the Audit Committee. It is responsible for auditing and reviewing operations according to relevant policies and regulations, assessing corruption risks, and presenting findings to the Audit Committee to ensure that the organization's internal control system is effective and consistent with established policies and measures.
- **The Company Secretary** is responsible for communicating anti-corruption policy and guidelines to all departments and stakeholders and reporting to the Audit Committee.
- **The Human Resources and Administration Department** is responsible for managing human resources in accordance with anti-corruption policy and guidelines, communicating them, and conducting orientation and training for all employees.
- **Company's employees** are responsible for complying with anti-corruption policy and guidelines and reporting suspicious incidents or behaviors that may constitute corruption to the Board of Directors, management, and employees. As well as external parties such as business partners, customers, and other stakeholders, etc., according to the processes established by the company.

General Guidelines

- Directors, executives, and employees are obligated to comply with anti-corruption policy and guidelines and to refrain from engaging in corruption, directly or indirectly.
- Directors, executives, and employees must not ignore or disregard corruption. If they witness any actions that may constitute corruption related to the company's business, they must report it to their supervisor or through the channels designated by the company and cooperate with the investigation, including providing relevant documents and evidence.
- The company has established important work procedures and regulations for employees to adhere to as a standard, as follows:
    1. The company has strict procedures and regulations for disbursing funds, with defined limits according to the approval authority table, specifying the purpose, and requiring accurate and clear supporting documentation from the recipient.
    2. The company has work processes in sales and marketing, project management with controls and risk reduction measures in place, and regular monitoring and follow-up.
    3. The company has work processes in procurement management, such as contract drafting, selecting suitable suppliers, and assessing the risk and potential of suppliers to maximize benefits for the company, in accordance with the company's procurement regulations.
    4. The company has work processes in human resource management, from recruitment and selection to promotion, training, performance evaluation, compensation, and disciplinary measures. This includes protecting employees who refuse to engage in corruption, even if such actions result in lost business opportunities for the company by not demoting, punishing, or negatively impacting employees who refuse to engage in corruption.
    5. The company requires supervisors at all levels to communicate the anti-corruption policy and guidelines to employees to ensure that business activities under their responsibility are carried out effectively, as well as to monitor the implementation of anti-corruption measures.
    6. The company encourages employees to seriously adhere to the anti-corruption policy and guidelines as part of their discipline and work regulations. Anyone who neglects, omits, or intentionally fails to comply will be considered to have committed a disciplinary offense

and will be subject to disciplinary action according to company regulations and may also face legal penalties. In addition, the company has a policy of not demoting or punishing employees who report or witness corruption.

- The company conducts annual audits of items at risk of corruption and anti-corruption practices to ensure that the measures are effective and consistent with changing risks, as well as implementing appropriate internal control systems to mitigate these risks.
- The company has a systematic approach to document and record keeping, with processes in place to control and audit accounting entries to effectively verify the accuracy and appropriateness of financial entries. In addition, procedures have been established to ensure that all entries are recorded completely, transparently, and traceably. Prevent entries that cannot be explained or are false.

Guidelines for Risk of Corruption List

Guidelines on Giving/Receiving Gifts or Other Benefits, Hospitality and Reception Services (Gift and Hospitality)

The giving/receiving of gifts or other benefits, hospitality and reception services must be in accordance with social customs and etiquette. The company recognizes that good relationships with business partners are a key factor in its continued success. Therefore, the company has established guidelines for appropriate and transparent practices, as per the Board of Directors Announcement No. 1/2569 regarding Good Practices on Giving/Receiving Gifts or Other Benefits, Hospitality and Reception Services (Gift and Hospitality), summarized as follows:

<u>Giving Gifts or Other Benefits</u>

1. Directors, executives, and employees must not give gifts, benefits, hospitality, or reception services. This includes not delegating such actions to others in a manner that constitutes bribery or compensation for the illicit gain of business benefits.
2. Gifts, souvenirs, or other benefits must not be given to the spouses, children, or related parties of government officials, customers, business partners, or individuals with whom the company is contacted, as this is considered receiving on behalf of others.

3. The giving of gifts, benefits, hospitality, or reception services on festive occasions according to local customs or commercial practices is permissible. 1. The gift must not create a conflict of interest or violate any laws. Its value must not exceed 3,000 baht. A gift or other benefit giving report must be prepared and approved according to the company's approval authority table.
4. The gift must be given in the name of the company and bear the company logo only. It must not be in the form of cash or cash equivalents, such as gift vouchers or gift cards.
5. A gift or other benefit giving report must be prepared for every item, with accurate documentation, to request approval according to the company's approval authority table. Company employees must:

   5.1 The applicant must prepare a gift or other benefit giving report form for submission to the authorized person according to the approval authority schedule.

   5.2 The applicant must submit supporting evidence, including receipts and photographs, to the accounting department.

   5.3 The accounting department will review the evidence of the gift giving. If the evidence is insufficient, the applicant will be notified to request further information or explanation. If it is proven that the gift giving does not comply with company policy and guidelines or is used as an excuse or pathway for corruption, the company will punish the offender.

<u>Acceptance of Gifts or Other Benefits</u>

1. Directors, executives, and employees shall not accept or solicit gifts, benefits, or hospitality services from customers, business partners, or related parties under any circumstances, if this may affect the impartiality of decision-making, lead to bias, discomfort, or conflicts of interest. Furthermore, it is strictly prohibited to authorize another person to accept bribes on one's behalf.
2. Acceptance of gifts, benefits, or hospitality services on occasions or festivals that are local customs or traditions, or commercial practices, as well as in cases where it is necessary to maintain good relationships between individuals or organizations, is permitted, provided that the value does not exceed 3,000 baht per instance. In cases where refusal to accept is unavoidable, or if it is necessary to accept a gift or other

benefit to maintain good relationships with that individual or organization, the following procedures must be followed:

2.1 Prepare a "Report Form for Giving or Receiving Gifts or Other Benefits" for approval from the authorized person, according to the approval authority table, within 7 days for fair allocation within the organizational structure.
Alternatively, the gift, etc., must be submitted to the Company Secretary's Department for collection and donation. In the case of external individuals or organizations for charitable or public benefit as appropriate.

2.2 In the case of consumable goods with an expiration date within 1 month, such as fresh produce or fresh fruit, etc., it will be at the discretion of the supervisor to distribute them to directors, executives, and employees as appropriate.

2.3 In the case of calendars, keychains, pens, notebooks, or other items used as promotional materials by the giving company,
the company allows employees to accept them as personal gifts, provided that the value does not exceed 1,000 baht.

<u>Entertainment and Reception Services</u>

1. These services must be provided on behalf of the company, only as authorized or as a representative of the company. This must be in accordance with general business customs, social etiquette, and business practices, including promotional activities, complimentary events, or other arrangements for representatives of clients, business partners, or contractors performing company business, provided they do not violate company regulations, code of conduct, and policies, and only as permitted by law.
2. Entertainment and reception services must be held in a location that meets ethical standards.
3. Company employees are prohibited from hosting or participating in entertainment and receptions during the process of procurement, bidding, or tendering of projects.
4. Entertainment expenses must not exceed 3,000 baht per event. Exceeding this limit requires approval according to company regulations and authority. Company employees must comply with the following:

4.1 The applicant must prepare a report form for giving or receiving gifts or other benefits for approval from the authorized person, as per the approval authority table.

4.2 The applicant must submit supporting evidence, including receipts and photographs, to the accounting department.

4.3 The accounting department must review the evidence of the gift giving. If the evidence is insufficient, the applicant must be notified to request further information or explanation.

If it is proven that the gift giving did not comply with company policy and guidlines. It can be used as an excuse or a loophole for corruption. The company will punish offenders.

Guidelines for Donations or Sponsorships

The company operates its business based on the principles of good corporate governance, considering its responsibility to society, the environment, and stakeholders to ensure transparency and accountability. Therefore, sponsorships provided by the company must be for the purpose of benefiting the company's business, brand, trade name, trademark, or reputation, and must not have any hidden agenda or be used as a pretext to gain an unfair advantage over others. Conversely, donations aimed at contributing to society or giving back to society, such as donations to education, religious preservation, arts and culture, hospitals, etc., without expecting any business return, must follow these guidelines:

1. Donations or sponsorships to any organization must be legal, not contrary to good morals, transparent, and not involve any actions that would harm society as a whole. This includes not using them as a pretext for bribery.
2. Donations or sponsorships must be approved according to the authority granted by the company. A written plan must be submitted specifying:

   The recipient organization, the purpose, the date, and the value of the donation, along with relevant documents to the recipient organization.
3. Proof of receipt or invoice must be provided for any donation or sponsorship. Or other proof of receipt of payment that proves who the recipient such as a thank-you letter, a receipt, photographs of the event, etc., so that it can be verified.

Political Contribution Guidelines

The company maintains a policy of political neutrality, not supporting or siding with any political party, and not providing financial or other support to any political party, political alliance, political authority, or candidate, directly or indirectly, at any level—local, regional, or national.

The company respects the political rights of its employees as good citizens under the constitution, including voting rights and membership in political parties. It supports all employees' political rights and freedoms under the law. However, employees must be aware that any actions related to politics must not directly or indirectly harm the company and must not use company resources for illegal political activities or bribery. The following guidelines apply:

1. All employees can exercise their political rights in their own name with caution, avoiding actions that could lead others to believe they are acting on behalf of the company.
2. When participating in political activities, employees should not engage in any actions or omissions that could mislead others into believing the company is biased towards any political party or supports any political activity, political alliance, political authority, or political candidate.
3. Employees participating in political activities must not wear the company uniform. Or to use any symbols or actions that may mislead others into believing that the company is affiliated with any political party, or provide support to any political action, political coalition, political authority, or political candidate.

Conflict of Interest Prevention Guidelines

The company conducts its business with a commitment to good corporate governance, adhering to the company's code of ethics and conflict of interest policy. It promotes ethical conduct among employees, encouraging honesty, integrity, transparency, and accountability in their duties. Therefore, the company has established the following guidelines to prevent potential conflicts of interest:

1. Directors, executives, or employees intending to assume positions as directors or advisors in companies, organizations, or business associations with a similar business model to the company must notify the Board of Directors.

2. Directors must immediately inform the Chairman of the Board of any conflict of interest and its details. They should refrain from participating in discussions, expressing opinions, or voting on agenda items in which they are involved, or express an intention not to participate in decision-making on such matters.
3. To ensure transparency and accountability in the company's operations, the company should disclose the names of major shareholders to the public. Related party reporting, including changes in securities holdings by directors and executives, must be submitted to the relevant authorities as required by law. Minutes of the meeting should be kept complete, accurate, and auditable.
4. In the event of a merger, acquisition, or purchase, the Board of Directors should establish an independent unit to verify the fairness of the valuation of operations and the transparency of the process.
5. Employees, including their family members, must notify the Managing Director or line executive in writing when participating in decision-making on any business matter. This may involve direct or indirect interests that could create a conflict of interest for the company.

Facilitation Payment Guidelines

The company has no policy of paying facilitation fees, either directly or indirectly. The company will not undertake or accept any actions in exchange for facilitating business operations.

Hiring Government Officials or Employees (Revolving Door) Guidelines

The company does not have a policy of hiring government officials/employees who are currently holding positions in government agencies to work in positions that may create conflicts of interest or are in exchange for business benefits, which may pose a risk of corruption. However, if it is deemed necessary to hire former government officials/employees, the company has established guidelines to prevent potential risks as follows:

1. The company has established a cooling-off period for government officials or employees, requiring them to have left their positions for 2 years or a period as specified by law for temporary employment.
2. The company has a due diligence process for individuals to be recruited and appointed to determine whether they are government officials or employees. This is a condition in the personnel recruitment process,

especially for directors and senior executives, to identify potential conflicts of interest before appointment.

3. The names and backgrounds of personnel who are government officials or employees appointed to positions as directors and senior executives are required to be disclosed along with the reasons for the appointment, in the company's annual report, Form 56-1 (One Report).

Whistleblowing and Whistleblower Protection

The company has established channels for receiving whistleblowing and complaints, along with guidelines and measures for protecting whistleblowers in accordance with the Whistleblower Policy. Whistleblowing channels are as follows:

By mail: Send directly to the Board of Directors or the Audit Committee:

Infraset Public Company Limited

165/37-39 Ramintra Road, Anusawari Subdistrict, Bang Khen

District, Bangkok 10220, Thailand

By email: ifssec@infraset.co.th

By website: https://www.infraset.co.th/

Complaint box: Information counter, 1st floor

Penalties

Corruption is considered a disciplinary offense and is punishable by law. If directors, executives, and employees of the company fail to comply with the anti-corruption policy and guidlines whether directly or indirectly, it will be considered a violation of the company's work regulations and will result in disciplinary action as per the work regulations and any other penalties as prescribed by law.

Communication and Training

- The company encourages directors, executives, and employees at all levels to be fully aware of and understand the anti-corruption policy and practices, especially those working in high-risk areas, through continuous training. This includes orientation courses, online seminars, information dissemination via bulletin boards, the LINE application and internal email to ensure that all personnel can implement them correctly and effectively.

- The company publishes the anti-corruption policy and guidelines including whistleblowing guidelines and the whistleblowing and complaint policy, to all stakeholders through various channels such as the company website, the company's annual report, Form 56-1 (One Report) and others to ensure that all parties are aware of and understand the clear guidelines.
- If company employee have any questions regarding the anti-corruption policy and guidelines, they can contact their supervisor, the company secretary, and the Human Resources and Administration Department for guidance and accurate understanding.

Policy Review

The company mandates a review of its anti-corruption policy and guidelines at least once a year or whenever there are changes to legal requirements, regulations and rules. This is to ensure that the policy and guidelines are consistent with the company's core values and comply with all applicable laws and regulations. The reviewed policy and guidelines are then submitted to the Board of Directors for consideration and approval.

This policy was reviewed and approved by the Board of Directors Meeting No. 4/2569 on August 11, 2026.

It is effective from August 11, 2026 onwards.

Mr. Kampranart Laohacharoenwanich

Chairman of the Board