

## Anti-Corruption Policy (Anti-Corruption) of the company

### Polynet Public Company Limited

Polynet Public Company Limited (“ the Company ”) is committed to conducting business with transparency and awareness of the importance of anti-corruption in all forms. by conducting business according to the law and beneficial to society Encourage employees to work with integrity and to be good citizens.

In this regard, the company therefore has established an anti-corruption policy ( Anti-Corruption Policy) as a guideline to prevent and combat corruption problems of the company. more clearly by creating a corporate culture for everyone to be aware of the dangers of corruption Create the right values and increase the confidence of all stakeholders in order to effectively fight against corruption. The details are as follows.

#### 1. Definition

1.1 Fraud and corruption ( Corruption) means the use of acquired power or existing assets in a wrongful way, or omitting to perform duties. for the benefit of oneself or others or to cause damage to the interests of others. Its forms include bribery. Giving things, money or any other benefits, fraud, money laundering, embezzlement, concealment of facts or obstruction of justice Misuse of authority to intimidate or claim benefits or any decision business from others and covers both the relationship between private sector and government agencies and between the private sector Unless such action is in accordance with the tradition at a reasonable and reasonable value.

1.2 Bribery means giving, offering or offering money, assets or any other benefits. for such person to act or not to act Or omit to perform duties in order to obtain or retain for inappropriate business benefits, illegal, unethical, or may negatively affect the image of the Company.

1.3 Personnel of the Company and its subsidiaries mean the Board of Directors, executives, permanent employees, temporary employees contract employees of the company and its subsidiaries

#### 2. Anti-corruption

2.1 Directors, executives, employees at all levels of the company are prohibited from and its subsidiaries Participating in all forms of corruption both directly and indirectly Bribery and exploitation in various forms such as soliciting, accepting, offering or giving property Including any other benefits to government officials or any other person doing business with the company. for the benefit of oneself, others or

creating business opportunities for the Company by covering all businesses in all areas whether inside or outside the country and to include all related agencies

2.2 The company has a policy to comply with laws and standards related to anti-corruption in Thailand. and in every country where the company's representatives Doing business on behalf of the company

2.3 The Company and Subsidiaries or business representatives of the Company over which the Company has control agree to comply with this policy

2.4 If directors, executives and employees perform any act that violates or does not comply with this policy either directly or indirectly will be subject to disciplinary action in accordance with the regulations set by the Company and may also be punished by law If the action is illegal In this regard, the Company's personnel and its subsidiaries Must understand and comply with the Anti-Corruption Policy in every step of the operation. If you see an action that violates this policy notify the supervisor or departments/persons in charge immediately

2.5 Supervisors who ignore the breakthrough or fail to comply with this policy by their subordinates Or aware of such actions but failed to manage, correct or notify clues. will be subject to disciplinary action in accordance with the regulations set by the Company

2.6 If an agent or contracting party of the company violates this policy , the company will proceed to terminate the contract with that agent or contracting party.

2.7 The Company will not punish, demote or cause negative impacts on any director, executive and employee. who reject corruption Even though such refusal will make the company lose business opportunities

### **3. Responsibilities**

3.1 The Board of Directors has a duty and responsibility to formulate a policy and supervise an effective anti-corruption system to ensure that the management realizes the importance of anti-corruption. corruption and embed such values into the corporate culture.

3.2 The audit committee has the duty and responsibility to review that the company has an adequate internal control system. including financial and accounting reporting systems internal control system internal audit system and risk management system Including reviewing the operation to be in accordance with the anti-corruption policy, requirements and relevant laws. To ensure that it meets international standards, is concise, modern and more efficient.

3.3 Management has a duty and responsibility to require an audit. and balance the work process system in the organization by promoting and supporting the Anti-Corruption Policy and communicated to personnel at all levels To ensure that all employees and related parties operate in accordance with the regulations. and anti-corruption policy Including reviewing, reviewing and correcting various systems and measures. other To be consistent with different changes and conduct periodic risk assessments against corruption. To identify high-risk events and find appropriate preventive and remedial measures. of various systems and measures to comply with changes in business, regulations and laws.

3.4 Internal auditors which was appointed by the Audit Committee Has duties and responsibilities to inspect and review operations that are in accordance with policies, guidelines, operational authority regulations and laws to ensure that the control system within the company are appropriate and concise side risk Corruption and report to the Audit Committee

#### 4. Exchanging Gifts Entertainment and receptions

4.1 Because the company Realizes the importance of building good business relationships with various partners. Therefore, this policy prohibits any action. which are transparent and are part of normal business operations which have laws, regulations, local customs or trade practices to be able to do such as Entertaining entertainment Giving or receiving gifts on special occasions as appropriate and acted rationally in accordance with the ethical guidelines for doing business

4.2 Entertainment feeding Giving or receiving gifts on special occasions can be done when

(1) does not act in an inducement to commit or not to commit an unlawful act Influencing business decisions or giving unfair benefits

(2) does not violate this policy Policy of business ethics of the company or any relevant laws

(3) Giving or receiving gifts is done on behalf of the Company. not on behalf of an individual person

(4) has acted in accordance with the occasion and customs that should be treated with each other such as exchanging gifts at a New Year's party

(5) The exchange of gifts is done openly.

(6) Entertainment can be done as necessary and with reasonable expenses. without extravagance or unreasonable frequency

## 5. Political assistance

5.1 Political assistance is financial assistance or anything else to political parties and politicians. including lending Donation of money and assets and various services other

5.2 The Company has a policy of political neutrality. There is no political assistance policy or any unbiased action.

5.3 Directors, executives and employees of the Company and its subsidiaries Have rights and liberties according to the constitution and related laws. in political participation, for example exercise of voting rights referendum, etc. In this regard, the directors, executives and employees of the Company must not use the property resources or time for the Company's operations Providing services on behalf of the Company or refer to the name of the company in supporting political activities or take any action anything that may lead to the understanding that the Company Is involved or supports any party

## 6. Charitable donations and sponsorships

6.1 Charitable donations can only be made in accordance with the Company's charitable policies. and guidelines of the company without claiming benefits in return from donors

6.2 Sponsorship (Sponsorship) is different from charitable donations as it is a channel to publicize the Company's business operations.

6.3 Directors, executives and employees of the Company and its subsidiaries must be careful not to make donations for Charities and sponsorships disguise bribery. Charitable donations and sponsorships are subject to a transparent review process and comply with applicable laws or regulations upon request in writing of the purpose of the charitable contribution and sponsorship. along with other supporting documents to the authorized person at each level

## 7. Complaints

7.1 Complaints and clues about corruption are the duties of personnel at all levels of the company. and its subsidiaries by being able to report clues about corruption anonymously through the methods and channels as follows

7.1.1 Electronic mail ( E-mail)

Contact : Chairman of the Audit Committee

E-mail address: ac@polynet.co.th

7.1.2 mail sent by post

Contact : Chairman of the Audit Committee

Polynet Public Company Limited

888 Village No. 11 , Bang Sao Thong Subdistrict, Bang Sao Thong District

, Samut Prakan Province

Phone: 02-3979094-6

7.2 Directors, executives and employees of the Company and all subsidiaries have a duty to cooperate in corruption investigations.

## 8. Communication and Training

8.1 The company will arrange for the communication of the anti-corruption policy. to departments at all levels in the Company and its subsidiaries through various channels such as the training of personnel of the company periodically inform the Company and its subsidiaries about various forms of corruption Risks from involvement in fraud and corruption and whistleblowing methods to make relevant people aware and implement the policy The training will be part of the training for new employees of the company. such as orientation for new employees training or seminar Public relations within the establishment and through electronic systems various of the company

9.2 If directors, executives and employees have any questions regarding this policy or any anti-corruption measures. You can inquire at the secretary of the audit committee.

## 9. Penalties

Any person who intentionally fails to comply with this policy Including bullying, threatening or discriminatory behavior with unfair means to the whistleblower or the whistleblower, or the person involved in the complaint or whistleblower under this policy arising from the complaint or whistle blowing shall be deemed

to have committed a disciplinary breach and shall be responsible for compensation. damage to the company or those affected by such action As well as being liable in civil and criminal matters or in accordance with any other relevant laws.

This Anti-Corruption Policy Approved by the Board of Directors Meeting No. 1/2022 on February 25, 2022 and effective from February 25, 2022

Approved by Chaiyaporn Nitaswarakul

( Mr.Chaiyaporn Nitaswarakul )

Chairman of the audit committee