



MUANGTHAI CAPITAL PUBLIC COMPANY LIMITED

332/1 Jaransanitwong Road, Bangplad, Bangkok Thailand 10700 Tel. +662 483 8888

Anti-Corruption Policy

MuangThai Capital Public Company Limited discloses clearly one's intention to employees at all levels to realize the importance of the company's business operation that will be successful with stability and sustainability based on commend from clients, shareholders, all stakeholders and the public on the company to operate with integrity, transparency and impartiality. Therefore, the Company has set Anti-Corruption Policy for transparent and impartial business operations by prohibiting directors, employees, executives, representatives acting on behalf of the company to related actions or have believed to be involved in corruption, whether directly or indirectly. The company also provides channels for receiving complaints and has a quick response process with the expect that all employees will inspect of in case of doubt or found inappropriate behavior and contrary to the Anti-Corruption Policy and morality of ethics. The company will listen to all complaints with equally, transparently, caring and give fair treatment to all parties. In addition, the company will verify of continue to follow this policy and anti-corruption measures. Including review guidelines and requirements according to the circumstances or the risk of changing business or statutory requirements on a regular basis.

Definition of Anti-Corruption Policy

- **Corruption** refers to the wrongful use of powers and duties in order to obtain undeserved benefits, such as giving gifts or services. Giving cash or something instead of cash bribery of government officials and corruption between private entities whether under any circumstances by offering a pledge, conflict of interest, concealment of facts or any other benefits that are contrary to morals and good ethics which isn't suitable for government officials, government agency, private agency or those who have duties whether directly or indirectly for such person to act or refrain, duty or to obtain or maintain any other improper business interests or for the benefit of oneself, family and friends, except in the case of laws, regulations, announcements, regulations, local customs or trade practice to be allowed.
- **Political contributions** are financial or other forms of assistance to support political activities. Financial assistance, such as lending money, donations, etc., and other forms of assistance, such as giving things or services, advertising to support political parties, buying tickets to events organized to raise funds or donate to political parties, employees leave or participate in political activities on behalf of the company, improper action or any act that is contrary to the constitutional law in order to obtain an advantage in trading business or contributing to business benefits. However, excluding employees participating in activities according individual liberties. The company has a policy to conduct business with impartiality, politically indifferent and will not bring funds or any other form of assistance for political assistance with the objective of benefiting business.

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- **Charitable donation** is an activity that the company clearly goal to help, support the community, society and environment. This can be considered a risk to the Company because of the activities involve spending money with no tangible return and may be used as an excuse or way of corruption. The company has set guidelines for charitable donations. In order not to make charitable donations with a hidden purpose.
- **Sponsorships** are money spent for business purposes, branding or company reputation. Subsidies may be linked to briber because of the risk of paying for a service or benefit is difficult to measure and monitor. Therefore, the company has established policies and criteria for approval of grant, review processes and control details, including evaluating the grant that has been spent appropriately and continuously and has truly brought benefits to society.
- **Gift cost, Service and reception cost and other expenses** are giving, receiving, gifts, privileges, entertainment facilitation and other expenses or any other benefits may be linked to bribery. This may lead to the risk of corruption. Therefore, the company has prepared policies and regulations to communicate ensure employees to understand and be careful in strict implementation.
- **Conflict of interest** policy refers to the conflict between personal interests and public interests, that is, the situation of conflict or the action of the Board of Directors, executives, employees and employees of the Company on decision-making Personal responsibility and public interest. which such actions may happen consciously or unconsciously either intentionally or unintentionally which takes a variety of forms. Until it became of things that are commonly practiced without being seen as wrong until resulting in that person lacking a fair decision.
- **Facilitation costs** are incidental expenses paid to government officials informally and is given only to ensure that Government officials will follow the process. or to encourage faster action. In this process doesn't require the discretion of government officials and the favor of government officials and rights of a legal entity, such as applying for a license, requesting a certificate and receiving public services.
- **Government officials** are an individual who is or used to be an official of State/Politician/Counselor to government agencies and work with private companies and may rely on relationships or internal information to benefit private companies causing conflicts of interest in performing duties of government agencies or a regulatory body with a regulated company. The result is an unfair business advantage or setting up private benefit policies that former government officials worked former.

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Remark : The Company operates car registration credit and hire purchase business. Has nothing to do with hiring government employees to work former.

Objective

1. To require the Board of Directors, executives and employees at all levels to comply with the policy without exception and there are regulations prohibiting executives and employees from demanding, or accepting corruption for their own interests, family, friends and acquaintances
2. To promote, support the role and participation of employees in preventing and combating corruption by raising awareness and giving importance to anti-corruption as a corporate culture
3. To build confidence of stakeholders and be honest in doing business together.

Range

The anti-corruption policy applies to directors, employees, executives, representatives acting on behalf of Muang Thai Capital Public Company Limited and its subsidiaries. The company has a policy not to demote, punish or give negative consequences to employees who refuse to corruption. Even if doing so will cause the company to lose business opportunities. There is a process for clearly communicating the principles.

Responsibility

1. Board of Directors have duties and responsibilities in determining approve anti-corruption policies and measures including supervision to have a system that supports effective anti-corruption to ensure that the management is aware of the importance of anti-corruption and put into practice and instilled into the corporate culture.
2. Board of Directors have duties and responsibilities in reviewing policies as appropriate to reflect changes in business, rules, regulations and applicable laws and approve the amendments and improvements to propose to the Board of Directors for approval.
3. Board of Directors have duties and responsibilities in reviewing financial and accounting reporting systems internal control system, the internal audit system and the risk management system to ensure that the anti-corruption measures are sufficient, appropriate and effective to comply with international standards.
4. Risk Management Committee have duties and responsibilities to assess corruption risks in business activities and to supervise and to formulate effective prevention or mitigation measures including monitoring and evaluation.



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5. Audit Committee have duties and responsibilities in reviewing policies as appropriate to reflect changes in business, rules, regulations and applicable laws and approve the amendments and improvements to propose to the Board of Directors for approval.
6. Audit Committee have duties and responsibilities in reviewing financial and accounting reporting systems internal control system, the internal audit system and the risk management system to ensure that the anti-corruption measures are sufficient, appropriate and effective to comply with international standards.
7. The Anti-Corruption Committee have duties and responsibilities in formulating guidelines for the implementation of the Anti-Corruption Policy. Including supervision to have a system that supports effective anti-corruption. including support providing advice on compliance with anti-corruption policy guidelines and other policies that may lead to corruption.
8. Chief Executive Officer have duties and responsibilities in establishing a system and promoting and supporting anti-corruption policies to communicate to employees and related people to implement including reviewing the suitability of various systems and measures to be in accordance with business changes, rules, regulations and legal requirements.
9. Internal auditors have duties and responsibilities to inspect and review the operation to ensure that it is in accordance with the policy, practice, authority. regulations relevant law and regulatory requirements to ensure that there is an appropriate and sufficient internal control system against potential corruption risks and report to the audit committee.
10. Executives, directors and employees at all levels have duties to comply with anti-corruption policies and measures without being involved in such matter, either directly or indirectly including not demanding or accepting corruption for their own interests, family, friends and acquaintances
11. Employees should not be neglected or ignored. When any dishonest behavior is found to the company must notify the supervisor or responsible person and cooperate in the investigation of various facts If you have any questions or concerns, consult with your supervisor. or the person designated to be responsible for monitoring the implementation of this matter through the channels specified.
12. Directors and executives must realize the importance of disseminating knowledge and advice to improve the understanding of their subordinates about Anti-Corruption for employees to comply with this anti-corruption policy including being a good role model in being honest Ethics and Good Ethics



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13. Punishment for violating laws, regulations and policies and other acts of the company will be subject to disciplinary action and or legal by considered the intention, environment, result of the offense.

Guidelines for Anti-Corruption Policy

1. Directors, executives, employees of the company are prohibited. (Including subsidiaries, associated companies, other companies that the company has control over business partner and persons who are intermediaries or representatives of the Company) perform or accept or support corruption in all approach, directly or indirectly.
2. Arrange for a corruption risk assessment in various business activities to identify high-risk work and potential impact and supervision to determine effective measures to prevent or reduce risks including monitoring and evaluation are regarded as part or of business operations which the directors, executives, and employees at all levels must participate in promoting and supporting the practice, control, follow up and report results to develop anti-corruption measures to achieve the policy set.
3. Providing written guidelines or measures against corruption to be consistent with the results of the corruption risk assessment in various business activities and in accordance with the laws of Thailand against corruption.
4. Because the company attaches importance to preventing the risk of corruption. So, it doesn't employ government officials to perform the duties of the company.
5. Set up an efficient internal control system and appropriate in activities that may have a risk of corruption. Directors, executives and employees at all levels must adhere with caution in the following matters.
 - Political assistance. It is help, whether directly or indirectly the support of money or other forms of political activities must be transparent legitimate. It isn't intended to induce improper conduct or corruption intent and to be in accordance with the authority of the company.

The company has a policy of being politically neutral. In the case that the company wishes to provide political support to promote democracy such support shall not be contrary to applicable law and must be properly recorded. There is evidence and procedural approval for later investigation. The company supports the exercise of voting rights both local and national level. This is an important right and responsibility of human democracy.

However, political contributions or political activities must be carried out on personal behalf. Cannot be referenced as a representative of the company. Since the company has a

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policy of political neutrality. In the case that the company wishes to make political contributions in order to promote democracy, such support must not contravene the relevant laws. and must be properly recorded There is evidence and procedural approval for later investigation.

- Sponsorships and Charitable Donations donation or financial support to be a part of Corporate Social Responsibility as well as enhancing the good image of the company without expecting business results in return must be transparent Legitimate by ensured that the donation or the subsidy isn't used as an excuse for corruption.

Sponsorships and Charitable Donations must be properly recorded. There is evidence and approval according to the company's disbursement process. for later investigation.

- Directors, executives and employees must not ask, demand and give things or any other benefits to those who have duties related to the company unless. In addition to providing or accepting local customs or business practices and traditions or trade customs. It should not have a higher value than the company specified and in accordance with the regulations of giving or receiving gifts and entertainment.
- Do not give or accept bribes in the business of any kind neither directly nor through a third party. Including subsidiaries, associates, control of the company, business partners and individuals can be regarded as intermediaries. In addition, the work of the government must be transparent, honest and legal.
- Procurement must be transparent, honest and legal government regulations and in accordance with the company's procurement policy.
- Compensation arising from sales promotions or trade discounts, either in money or any valuable assets should be in accordance with normal business practices without improper purpose and it must not be a bribe in order to obtain an agreement to do business together including not receiving for the benefit of any person except in the case of giving and receiving the company to the company without contradicting the anti-corruption policy, which must have clear evidence or documents of receipt to be able to verify.
- Providing continuous communication and training to provide knowledge on anti-corruption to directors, executives, employees, subsidiaries, associated companies, other companies that the company has the power of control. The company has the right to control the business of agents or commercial institutions and individuals in all fields to encourage the company has a corporate culture that is non-corruption Being honest and responsible for

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performing duties and responsibilities with details of procedures and penalties in case of non-compliance with anti-corruption measures.

- This policy covers personnel management processes, from recruiting or selecting personnel orientation, training, performance evaluation promotion reward and stipulating penalties that reflect the company's commitment in anti-corruption. By requiring supervisors at all levels to communicate with employees for use in business activities that are under their responsibility and supervise the practice to be effective.
- The company has a policy to protect employees at all levels in the organization who reject corruption will not punish or affect Even if doing so will cause the company to lose business opportunities.
- Provide multiple secure communication channels that employees and related parties can access for advice on the implementation of anti-corruption measures and provide information or clues to worst or make a complaint confidently without risk to the informer as well as provide an audit process and take appropriate action.
- The company provides procedures for keeping documents ready for inspection. Including recording financial transactions with sufficient evidence and none of the items are not recorded or unable to explain or is it a false entry. There is a transparent and fair financial status reporting mechanism. There is also an audit process of the internal control process to ensure the effectiveness of the accounting process and data retention.
- Those who commit corruption are considered violations of the Company's code of conduct. Disciplinary action will be taken in accordance with the Company's work regulations. and may be subject to legal penalties if the act is unlawful.
- The company has authorized and responsibilities to the management in formulating guidelines and follow up to ensure that anti-corruption measures are complied with and organize the organizational structure and resources to be consistent with the implementation of anti-corruption measures.
- The Company has a policy to disclose and exchange internal policies, experiences, good practices. and guidelines for success in supporting ethical business practices to accurate and transparent in Thailand. It also has a policy to cooperate with companies in the same industry, partners and other stakeholders by creating a common practice and participation in anti-corruption activities.

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Risk assessment

All directors and executives of the Company are aware of and understand that the Company's business processes there may be a risk of corruption and bribery to eliminate the risks directors and executives are required to regularly assess the risks of corruption and bribery that may occur in the Company at least once a year and review the existing risk management measures appropriately to hedge the risk to an acceptable level. Moreover, the company's executives must communicate to all employees at different levels to understand and cooperate continuously to manage such risks effectively.

Internal control and Anti-Corruption Compliance Audit

The company has a policy for every unit to work effectively according to the company's goals and objectives of the company and has a systematic internal control as well as to develop personnel in the unit to have a sense of cooperation in working in accordance with the regulations including relevant laws and ready for the company to assess and check the work at any time. The guidelines are as follows.

1. Designated responsibilities and management of executives at all levels to Check and follow up on the work within their departments to be effective and correct according to the operating regulations as well as having a duty to supervise, inspect and supervise the follow-up of the operations of subordinates to comply with the anti-corruption policy on a regular basis. There is a strict internal control system that can be checked and all departments must prepare a manual that clearly defines the operating regulations in writing to be the norm for the operation of the business in their care by complying with the Company's anti-corruption policy.
2. Assign the internal audit unit which is independent to assess the internal control system risk management system and corporate governance processes of various activities or systems of the Company that it is sufficient, appropriate and effective in accordance with its intended purpose including complying with the anti-corruption policy legal regulations or of the relevant regulatory agencies.
3. The internal audit unit will support the executives of all departments in establishing internal control in all departments and conduct an audit at an appropriate time for ensures that every unit has an effective internal control system and has consistently followed the established procedures to will lead to improvements in the work system to be more efficient.
4. The financial statements and business performance shall be audited by certified public accountants every year to ensure that financial or accounting information is correct, reliable, timely and in line with legal requirements.



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5. Approaches to internal control that are assessed and risk control is a guideline that will help each department to assess the risks in the work for which they are responsible. and find a way to control it by reducing the impact or reduce the likelihood of such risks of the company wants employees at all levels to participate in the assessment and control of risks in general to prevent potential injury.

The Company has an internal audit unit that performs the internal audits to ensure that key operations and important financial transactions of the company are carried out in accordance with established guidelines with efficiency includes to verify compliance with laws and requirements related to the company to the internal audit institutions are free to check and balance. The Company therefore requires the internal audit department to report the audit results directly to the audit committee to review the effectiveness of the company's internal control system. This includes financial control, operations, compliance control, risk management and a focus on irregular transactions and report to the shareholders that the said action has been done.

Anti-Corruption Policy Monitoring and Review

1. Provide annual review of anti-corruption policies and guidelines. All departments according to the organizational structure have joint duties and responsibilities in reviewing them to be sufficient and appropriate.
2. Provide an audit of the internal control system and various processes. regularly and report on urgently investigated issues to ensure that the internal control system is effective against corruption. The results of the audit will be discussed with the Audit Department to find a suitable solution and report to chief executive and the Audit Committee was informed.

Legal punishment

People who violate laws, rules, policies, and other regulations of the company shall be subject to disciplinary sanctions. Considering by the intention, environment, result of the offense, Cooperation in the investigation, actions taken by the infringer to correct or prevent the same from happening again and the violator shall be subject to disciplinary sanctions from warning to disciplinary punishment, the highest is termination of employment. Disciplinary punishment shall be in accordance with the Company's regulations. The verdict according to the resolution of that committee meeting is final.

For company directors, in case of non-compliance with anti-corruption measures which the punishment measures must be fair Compared to penalties for employees.

Such policy was reviewed and approved by the Board of Directors, effective since 22nd February 2022.