



MUANGTHAI CAPITAL PUBLIC COMPANY LIMITED

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

Gift or other Benefit Giving and Receiving Policy

Muangthai Capital Public Company Limited (“the Company”) realizes that business operations are conducted under good corporate governance principles. The company, therefore, sees that corruption has a detrimental effect and is an important obstacle to social and economic development as an illegal business activity creates business injustice negatively affects the reputation of the company in terms of business ethics competitiveness, and makes the company unacceptable as well as reducing the confidence of shareholders, investors, and all stakeholders. The company, therefore, holds the key principle that it does not accept any form of corruption, directly or indirectly. The company, therefore, has established guidelines for activities such as giving and receiving gifts entertainment charity donations funding political neutrality conflict of interests, and any other benefits. This may cause a risk of corruption. By requiring directors, executives, and employees at all levels to comply with caution in the following matters:

1. Gift Giving and Receiving Policy or alimony

Giving and receiving gifts or alimony can be done reasonably by keeping it at an appropriate value and not soliciting or accepting or accepting gifts that may influence the decision of the recipient. entertainment This is a strategy that the company can allocate to operate to get to know. Create an impression and friendliness hosting a large number of people should be avoided at once. or consecutive receptions or frequent receptions entertainment must be a fee or service required by normal business customs and the person receiving the certification or receiving the service must not be an employee of the company. unless such employees are also obliged to participate in the certification.

Guidelines

- 1) Gifting or payment of hospitality it must be considered that it is not bribery that creates an intimacy that leads to future customers or partners at the same time, improper gifts or entertainment payments to customers can affect their decision-making. Therefore, caution must be exercised in such matters and to comply with the Code of Conduct or receive a gift or property or any other benefits.
- 2) Directors, executives, and employees of the company and affiliated companies gifts or assets or any other benefits should not be requested or demanded from partners or any person involved in the Company's business, regardless of the claim or receive for oneself or others which implied in a way that incentivizes to act/refrain from performing duties in a wrong way or committing an illegal act unless it is something that is owned by a business partner or person involved in the business of the

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company, according to tradition or trade customs, the gifts or the remains of such things must not be more than 3,000 baht per time per unit and not cash in the case of cash equivalents, payable must be made by specifying the name of the company as the recipient only by letting the agency notify the business partner or related person to bring it directly to the supervisor and have the supervisor deliver that item to the administrative department with a report on the receipt of gifts to take appropriate action. In the event that the items received are food, beverages, snacks, fruit that are ready-to-eat fresh food, the agency must deliver the items to the administrative department for further allocation.

- 3) The directors, executives, and employees of the company and affiliates must not give bribes or any benefits that are similar to the Company's personnel or third parties especially government officials property gift giving, or any other benefits to government officials both in the country and abroad must ensure that the giving is not contrary to local law and customs.
- 4) If souvenirs are given to the company during important events, the company can assign or allow employees at all levels to accept them on behalf of the company.
- 5) All employees. company-level gifts should not be given to supervisors even with the consent of the supervisor except in the usual case of customs where gifts are given to each other and the value of items does not exceed 3,000 baht per time.
- 6) Employees at all levels of the company never give or receive or promise to give or receive any benefit or anything of value to motivate them to act or neglect to practice including any activities that fall under the aforementioned unless it is given according to local customs and traditions or trade customs which is worth not more than 3,000 baht per time or per unit.
- 7) Entertainment is intended to maintain good relations between companies. with those involved in doing business in the reimbursement of allowances, documents specifying the name of the payee, amount, business objectives, and attaching important documents used in decision-making must be presented to the authorized person for approval, and the applicant for reimbursement must submit evidence of business operations paid to the Accounting and Finance Department to examine in accordance with the disbursement and disbursement procedures.
- 8) Directors, executives, and employees of the company willfully or neglect or fail to comply with this guideline it shall be deemed that such a person who behaves inconsistently with the regulations set by the company may be maybe investigated or punished according to the policy set and the Company's human resource

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procedures. Directors, executives, and employees can give or receive gifts from business partners as follows:

- In the event that the supervisor deems it unsuitable to accept the gift or any other property or benefit shall be returned to the giver immediately if it cannot be returned, it must be delivered to the supervisor to be forwarded to the administrative department as storage and the head of the administrative department shall report to the Executive Committee for consideration and allocation for the benefit of the company as a whole.
- Gifts are given by others to the company and are valuable in remembrance of important company events such as souvenirs from participating in social contribution activities company personnel is allowed to receive on behalf of the company and deliver to the management and general services. It is the person who collects and reports to the Executive Committee.
- Company personnel and affiliated companies gifts should not be given to supervisors, even if the supervisor does not agree or sympathize with his relatives to accept gifts from subordinate personnel except in the usual case of the tradition of giving gifts to each other.
- In the case of receiving assets or any other benefits whether it is received from both domestic and foreign, whether specified as personal or not but must be accepted in order to maintain a friendship or a good relationship between people. The recipient must promptly report to the supervisor and hand it over to the administrative department to collect and report to the Executive Director.

2. Political neutrality policy

The company has a policy of being politically neutral will not support not participating or an act that is in favor of a political party both directly and indirectly this includes bringing capital or using company resources for activities that will cause the company to lose its political neutrality and/or be damaged by its involvement in such activities. However, the company respects the freedom to exercise the political rights of all employees as good citizens by law and under democracy.

Guidelines

- 1) Prohibit campaigning or advertising for any political party or politician in the company area including not using the company's resources and assets in that regard.
- 2) The company adheres to democracy and encourages the Company's personnel to exercise their right to vote in accordance with the constitution.

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- 3) The Company's employees can exercise their political rights by acting on behalf of each individual which must be done outside of work hours and does not use the position in the company or the name of the company to influence others to pay subsidies or give support to any politician or political party.
- 4) Prohibit superiors at all levels to order or influence by any means that allows employees or subordinates to participate in all types of political activities and avoid commenting on politics at work or during work hours. which may cause conflicts of opinion.

3. Charitable donation policy and financial support

Charity donation and financial support must act on behalf of the company with transparency according to company regulations and legal to ensure that donations or the subsidy will be used for the public benefit or for the purpose of the donation it has not been used for any dishonest use.

Guidelines

- 1) Care should be taken when making donations of money, things, and sponsorships, as they are activities with no tangible rewards that could be considered indirect corruption or with a covert purpose to gain an improper business advantage.
- 2) Charitable donation and financial support must act on behalf of the company with transparency in accordance with company regulations and legal to ensure that the donation or the subsidy will be used for public benefit or for the purpose of the donation are not used for corruption.
- 3) Disbursement of money donated items to prepare a letter requesting approval for purchase, order, repair, specifying the purpose Item details, amount and attach important documents for decision making presented to the authorized person under the authority to operate.
- 4) The requester must follow up with evidence of receipt of payment or donated items this ensures that it has been delivered to the recipient in their entirety and that evidence such as receipts, thank you letters, photos of activities, etc. are received when proof of payment is received or donated items must be sent to the Accounting Department for complete examination.

4. Anti-Bribery and Facilitation Fees Policy

The company has no policy to pay any form of facilitation fee both directly and indirectly in exchange for facilitating business operations or for urging faster action whether it is

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facilitating between companies and private entities or between the company and the government. The Company's operations include companies operated through third parties, subsidiaries, affiliates, other companies with control business partner and persons who may be regarded as intermediaries or representatives of the company. Moreover, dealings with the government sector must be transparent, honest and legal.

Guidelines

- 1) The company has no policy to pay facilitation payments to government officials under any circumstances allowing company personnel to pay facilitation payments to government officials carries a very high risk of becoming bribery and increasing business costs increase the chances of defamation and violating the company's Anti-Corruption Policy.
- 2) Employees must not pay or receive facilitation fees from both the public and private sectors in exchange for facilitating work operations. including not accepting the convenience fee to expedite operations within the company that facilitate third parties or customers.

5. Remuneration policy due to promotional campaigns or trade discounts

Compensation due to sales promotions or trade discount means accepting or giving things or money for the benefit of sales support or arises from the cumulative value of the turnover that has reached a pre-defined sales target in accordance with general business practices without improper purpose and it must not be a bribe in order to obtain an agreement to do business with you not acceptable for the benefit of any person.

Guidelines

- 1) It should follow normal business practices. without improper objectives and must not be bribery to obtain a business agreement including not accepting for the benefit of any person.
- 2) There must be rules or contracts or trade agreements in writing and approved by the authority in accordance with the regulations on the power of conduct.
- 3) Paying or receiving promotional money or trade discounts must provide information or Documents showing the origin of the money value, evidence of payment or receipt of money that has been reviewed and approved by the authorized person and specify the name of the payee to be able to check.

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6. Conflict of Interest Policy

The company operates its business with honesty, transparency, and accountability, and is designated to be the duty of the Board of Directors, executives, and all employees of the company to avoid getting into an interest or being involved in an action that conflicts with the interests of the company which will result in the company losing benefits or reducing the efficiency of the operation.

However, the Company cannot predict what might happen during the tenure of directors, executives, and employees in the event that a transaction is necessary or cannot be avoided the company will take care of that transaction it is transparent and fair, just like making transactions with outsiders by taking into account the best interests of the company and being fair to those involved and uphold the interests of the company as a priority and will not involve activities that may cause conflicts of interest both in the form of entering into a partnership holding a position related to finance or having a relationship with outsiders, including directors, executives, and employees, must comply with the Company's regulations and prepared a conflict of interest report annually and every time when an event occurs during the year.

Guidelines

- 1) Employees at all levels of the company to take action and make decisions on activities or transactions that have conflicts of interest it must be carried out without consideration of personal interests not in conflict with the Company's core interests fair and reasonable pricing is set up as a transparent transaction with a third party.
- 2) Employees at all levels of the company must comply with the Company's regulations including treating the company to the best of their ability do not take time at work to do other business that is not related to the interests of the company.
- 3) Employees at all levels of the company must avoid financial involvement or relationships with outsiders that will result in the company losing benefits or causing conflicts of interest.
- 4) Directors, executives, and employees must not disclose the Company's non-disclosure information to other persons which will lead to seeking benefits for oneself, family, or friends is considered an act that is contrary to the Code of Conduct for Conflicts of Interest, such as providing information on plans or company policies. Which is internal information for outsiders to know.
- 5) The performance of duties and positions of directors, executives, and employees must not conflict with the Company's core interests.

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- 6) The directors, executives and employees must not accept external work that is in competition with the Company's business operations or causes conflicts of interest with subsidiaries.
- 7) The directors and executives must report their interests to the Company Secretary annually or to report without delay when an interest arises to be used to verify transactions related to each other in accordance with the law.
- 8) The Board of Directors And the management must consider conflicts of interest in relation to connected transactions between companies or the company and the connected person carefully with honesty, reasonableness and independence under the framework of good ethics taking into account the best interests of the company.
- 9) The recruitment of new personnel who has a relationship with employees must be transparent and fair to those who have the same qualifications employees of the company shall not interfere or use their influence to assist in the determination of the recruitment of employees.

7. Trade and Investment

The company has a trade and investment policy that is based on its mission, vision, and values. including adhering to the framework of good competition rules and operating the business in accordance with the good corporate governance policy.

Guidelines

- 1) Investments to increase or decrease investments must be approved by the authorized person according to the Company's procedures.
- 2) Do not call or receive an offer or give a financial or another form of interest to any person or entity to obtain business contracts, benefits Practice, or refrain from any practice inappropriate or unlawful, or unethical.

8. Borrowing, lending and contingencies

- 1) The borrowing, lending, and contingencies must be approved by the authorized person in accordance with the Company's procedures.
- 2) Appropriately and in accordance with the connected transaction policy.
- 3) Do not call or accept the offer or give a financial or another form of interest to any person or entity in order to obtain a loan or loan agreement or result in the acquisition or expiration of any improper or unlawful or unethical obligation.

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9. Procurement

Procurement of goods and services is an important process that enables a company's business to survive therefore stipulates that the procurement process is in accordance with the procedures it operates with fairness, reasonableness, transparency, and can verify that there is no conflict of interest and treating business partners equally with fair competition to create an operation that gives the most benefit to the company.

Guidelines

- 1) Must clearly state the objectives of the procurement and present them to the authorized person according to company procedures.
- 2) Comparison of prices from vendors or service providers is transparent and fair to all parties.
- 3) Do not solicit or receive any financial or another form of benefit from the seller or service provider in order to receive goods or services that do not meet the terms of the agreement, or the features do not meet the order or quality standard and in the event that such an incident is found, the employee must notify the Assistant Purchasing Manager immediately to find solutions together.

10. Preparation of financial reports

The company requires a transparent and accurate financial reporting process as well as having an appropriate internal control system effective to prevent the improper practice.

Guidelines

- 1) Recording various accounts there must be appropriate details, correctness, and sufficient evidence that can be examined details of receiving-paying, trading, asset management, and clear transaction objectives and none of the items are not recorded or unable to explain and there is no falsification of accounting records or related documents to conceal the true transactions.
- 2) There must be a process to verify the records of accounting records or information in more than one organization's information systems to create checks and balances between each other and prevent inappropriate practices.
- 3) There is a procedure for keeping various accounting records to be ready to verify the receipt of money from customers or any other person.
 - (1) Must have a reasonable reason and must know the purpose of receiving money every time.



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- (2) Must have issued a document of receipt of money as evidence to the payer every time and have complete supporting documents for accounting records in accordance with accounting principles.
 - (3) If the receipt of money is unlawful or invalid for the Company's objectives to refuse to receive such money and notify the supervisors in the line of work to find ways to prevent and correct in cases where legal matters are concerned, consult with the Legal Department or the Company's Legal Counsel. to take appropriate action.
 - (4) Ask for cooperation from payers to make payments via the bank's electronic system or pay by check by crossing only "A/C PAYEE" and crossing out "or holder" in case of cash payment, it must be deposited into the company's account completely within the next business day.
 - (5) Prohibit the money paid to the Company by the payer to be deposited into the personal account of the employee or anyone other than the account of the Company's bank.
 - (6) Not asking or demanding for money or any other benefits from the payer to delay receiving the company's money or causing damage to the company from not receiving the money or receiving incomplete or late payment.
- 4) Payments to creditors or any other person
- (1) Must have reasonable grounds and must know the purpose of every payment.
 - (2) Must be approved by the authorized person according to the Company's procedures and must receive a valid proof of payment complete from the payee to use for accounting records.
 - (3) If an incorrect or inappropriate payment transaction is found notify supervisors in the line of work to find ways to prevent and correct it.
 - (4) Treat creditors or payees equally and without discrimination. The payment must be in accordance with the appropriate business conditions or agreed upon.
 - (5) Not asking for or asking for money or any other benefits to the creditor or payee to make the company damage due to overpayment or payment earlier than the specified conditions.

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11. Recording and keeping data in the computer system

- (1) Determining the responsibility of all users and data administrators in the computer system.
- (2) Having adequate and appropriate protection and backup measures to maintain the data in the computer system is always readily available.
- (3) Provide a security system for information in the computer system to prevent unauthorized access to information by those involved and can be traced back to the use.

12. Personnel management process

The anti-corruption policy covers personnel management processes from recruiting and selecting candidates, orientation, training, performance appraisal reward promotion, and the determination of penalties.

- 1) It is forbidden to request or claim any form of benefit or reward from applicants or people related to the application.
- 2) Have a basic knowledge test and/or check references to insure initially that the person who the company will consider accepting as employee have good behavior and attitude.
- 3) The Company will not demote, punish, or give negative consequences to employees who reject corruption even if that action will cause the company to lose business opportunities.
- 4) Directors, executives, and employees at all levels who commit corruption are considered violations of the company's rules and regulations, and employees are subject to disciplinary action and may face legal penalties in cases where such actions are unlawful.
- 5) Employees of the company must not neglect or be indifferent when witnessing fraudulent acts related to the company by notifying the supervisors in the line of work or whistle-blowing channel and cooperate in providing information or facts in case of doubt, consult your supervisor or person in charge through various channels specified by the company.
- 6) The company provides fairness and protection to employees who report corruption related to the company by using measures to protect complainants or those who cooperate in providing information or facts appropriately.
- 7) Support and promote the education on anti-corruption to directors, executives, and employees thoroughly to promote honesty, integrity, and accountability in the

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performance of duties and responsibilities by conveying the commitment of the company that corruption is unacceptable and instilled into organizational culture.

- 8) Performance appraisal must be appropriate, transparent, and fair in accordance with the Company's procedures.

13. Internal communication policy of the Company, its subsidiaries, and other companies that the company has the power to control.

Communicate anti-corruption policies and guidelines to directors, executives, employees, subsidiaries, associated companies, and other companies that the company has control over persons involved in all aspects of a business person acting on behalf of the company, consultants, customers, business partners for implementation and disclose information to the public.

Guidelines

1) Communication to Directors, Executives and Employees

- (1) Public relations on an intranet or on the Company's public relations board.\
- (2) Orientation for directors, executives, and new employees.
- (3) Specify a statement indicating their acceptance of the anti-corruption policy good Corporate Governance Policy and the Company's business ethics in the labor contract for executives or new employees to sign for acknowledgment and strictly adhere to them.
- (4) Provide training on anti-corruption to the Company's executives and employees.
- (5) Communicate through the monthly management meeting channels to know the results of operations, progress, or problems in the implementation of anti-corruption measures including discussing the best practices together.

2) Informing subsidiaries, associated companies and other companies that the company has control over.

- (1) Submit policies and manuals for compliance with anti-corruption policies to subsidiaries, associated companies, and other companies that the Company has the power to control to publicize it for directors, executives, and employees to acknowledge.
- (2) Arrange for directors, executives, and employees of subsidiaries, associated companies, and other companies that the company has the power to control to regularly attend training courses on anti-corruption with the company.

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3) Notifying customers, business partners and persons acting on behalf of the Company

- (1) Prepare letters to deliver anti-corruption policies to customers and business partners.
- (2) Prepare information about anti-corruption policies as part of the terms of the contract between the companies with customers or partners or a person acting on behalf of the company both domestically and internationally.

4) Informing related parties in general.

- (1) Public relations on the Company's website www.muangthaicap.com including disclosure by means or other appropriate communication channels.
- (2) Disclosure of information in the annual registration statement or annual report.

The company provides a secure and accessible channel so that employees and related persons can seek advice on the implementation of the Anti-Corruption Policy and report any wrongdoing or complaints with the assurance that the reporters will receive appropriate protection. Including having a person to monitor and follow up on every matter that has been notified.

14. Policy for receiving complaints and whistleblowing

The Company has set up channels for complaints or whistleblowing from illegal or unethical acts or anti-corruption policy or behaviors that may imply corruption or misconduct by individuals in the organization this means executives, employees and stakeholders including having a mechanism to protect information providers and attaches importance to keeping complaints confidential to reassure the complainants.

1) Objectives

- To encourage executives and employees to conduct business properly, transparent, fair, and accountable in accordance with the principles of good corporate governance and the Company's Code of Conduct the company expects everyone to report any violations or suspected to be contrary to such matter to the company in good faith the company will improve or proceeding to ensure accuracy, appropriateness, transparency, fairness and in accordance with securities laws and stock exchange of Thailand which also provides



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protection for those who provide good faith information to regulators This is the principle that the company has implemented.

- To ensure that the supervisor and the Company's Human Resources Department are responsible for and give advice as well as to monitor the behavior, behavior, and actions of employees to ensure they are correct and those who report such matters will be protected if they act in good faith.

2) Complaint Measures and whistleblowing

The Company has provided channels for complaints and whistleblowing this covers from receiving complaints to the investigation of facts and summarizing, including the protection of the whistleblower and the person concerned to receive complaints or opinions or suggestions from stakeholders who are affected or are at risk of being affected by the Company's business or from the performance of the Executive Director and employees of the Company regarding illegal or unethical acts, including behavior that may imply corruption.

3) Scope of whistleblowing or complaints

If anyone has a clue about the wrongdoing which meets the conditions in the following matters:

- Unlawful actions Policy/Principles of Corporate Governance or business ethics.
- Behavior that may lead to corruption or misconduct to seek unlawful benefits for oneself and or others such as corruption embezzlement, fraud, etc.
- Violation of rules, regulations, and company regulations.
- Receiving unfairness in the performance of work or finding a defective internal control system of the company causing suspicion that it may be a channel for corruption or make it suspicious that it may be a channel for corruption or make the company lose benefit.

4) Channels for whistleblowing or complaints

- Send an electronic letter (Email: whistleblower@muangthaicap.com)
- By post, address and send to
Ms. Kongkaew Piamduaytham.
Chairman of the Audit Committee,
Muang Thai Capital Public Company Limited
332/1 Charansanitwong Road, Bang Phlad Subdistrict,
Bang Phlad District, Bangkok 10700
- Telephone the Complaint Department at +6681-751-1587



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5) Consideration of clues or complaints

- Information received by the company will be held a secret and the names of the whistleblowers we're not disclosed or public complaints without consent.
- Details of clues or complaints must be truthful, clear, or sufficient to ascertain the facts for further action.
- The response time to the complainant should not exceed 3 days after receiving the complaint.
- Complaint processing time depends on the complexity of the matter document adequacy evidence received from the complainant including documentary evidence and explanation of the complainant, but no later than 30 business days or complaints will be entitled to protection whether it is an employee or a third party.
- Complaint recipient and those involved in the investigation process relevant information must be kept confidential and will be disclosed to the extent necessary considering the safety and damage of the complainant or those who cooperate in the investigation of facts or source of information or related persons.

6) Measures to protect whistleblowers or complainants and confidentiality

- The company will collect information and the identity of the whistleblower or the complainant.
- The Company will disclose information as necessary considering safety and the damage of the person reporting the source of information or the person concerned who has been damaged will be alleviated by an appropriate and fair process.
- The company will not act unfairly toward the whistleblower who appeals whether by changing job position, job description, workplace, suspending work, threatening, interfering with work, termination of employment or any other act that is unfair to the whistleblower or whistleblower or those who cooperate in the investigation of facts.
- In case of complaints or those who cooperate in the investigation can request the company to determine the appropriate protection measures or the company may impose protection measures by the complainant or those who

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cooperate in the investigation of facts without request if you see that it is prone to damage or insecurity.

7) Process and procedures for complaints and whistleblowing

When witnessing an incident that has violated or does not comply with laws and regulations Principles and guidelines for anti-corruption policy guidelines and the policy of accepting, giving gifts or any other benefits including actions that may imply corruption of directors, executives, and employees of the Company. Complainants can report the matter through channels for complaints and whistleblowing in the case of employees, if they see such incidents should inquire or consult with the supervisor first and if not sure or uncomfortable doing so able to report the matter through complaint channels and whistleblowing when the recipient receives the complaint and can consider taking appropriate action.

1) Registration and Submission

The Assistant Audit Manager registers for complaints/whistles received from the Chairman of the Audit Committee/Audit Committee get notified including receiving corruption clues from internal audits of the company unless the Internal Audit Department is the person who has been complained to the chairman of the audit committee shall report the complaint directly to the chairman of the executive committee and set the date for notifying the progress of the complaint to the complainant as follows:

- Cases that seriously affect the reputation of the company to act as urgently as possible.
- In other cases, act as soon as possible Complaint Coordinator

Record the information of the complainant as follows:

- Name of the complainant except were not identified.
- Date of complaint
- Name of person or incident complained
- Other relevant information

When registering for complaints set the secret class according to the content of the story and proceed as follows:

- Send the complaint handler to investigate the facts. And order according to the authority



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- Send a copy of the matter to the Human Resources Department for the initial acknowledgment to prepare for advice on disciplinary action or others.
 - Send a copy of the matter to the Chairman of the Executive Committee and the managing director knows about.
- 2) Chairman of the Audit Committee/Audit Committee Consider assigning the Chief Executive Officer to give orders or assign appropriate persons to investigate and investigate facts according to the level of confidentiality or according to the duties as follows:
- Complain about unfairness from work or violation of rules articles of Association Assign the Human Resources Department to conduct investigations and investigations.
 - Report clues or find incidents from the investigation about the actions of employees at all levels that may commit corruption to assign the Internal Audit Manager to be directly responsible or other suitable persons.
 - In the case of complaints or whistleblowing of high-level executives the chairman of the audit committee/audit committee must be assigned to the management at the higher level or other appropriate persons the investigation and investigation of the facts must be carried out as follows:
 1. The designated person must set up an investigative team of at least 3 people, with representatives from the Human Resources Department branch affairs department in the line of direct responsibility and assistant manager of the audit department (or the Accounting and Finance Department) as appropriate for the matter to be considered everyone must have no stake in the complaint or clue.
 2. The investigation committee proceeds to find out the facts by collecting information and documentary evidence including investigating others involved or may ask other relevant agencies to contribute facts about the correct practice for the benefit of the conclusion by completing the work within 30 days, except for the complexity need to find additional

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evidence and witnesses to complete the process within 60 days.

3. In the investigation process the investigative committee must act impartially and not disclose information to unrelated parties and must record the investigation and keep evidence, both documentary or electronic data, for at least 3 years or until the end of the legal period to ensure that the company there is enough evidence to be used in court.
4. The designated person must set up an investigative team of at least 3 people, with representatives from the Human Resources Department branch affairs department in the line of direct responsibility and assistant manager of the audit department (or the Accounting and Finance Department) as appropriate for the matter to be considered everyone must have no stake in the complaint or clue.
5. The investigation committee proceeds to find out the facts by collecting information and documentary evidence including investigating others involved or may ask other relevant agencies to contribute facts about the correct practice for the benefit of the conclusion by completing the work within 30 days, except for the complexity. need to find additional evidence and witnesses to complete the process within 60 days.
6. In the investigation process the investigative committee must act impartially and not disclose information to unrelated parties and must record the investigation and keep evidence, both documentary or electronic data, for at least 3 years or until the end of the legal period to ensure that the company there is enough evidence to be used in court.

3) Complaining or giving clues in bad faith

If it is found that the complaint or whistleblower is acting in bad faith or reporting that information is false due to intentional misrepresentation of facts or is an insult to others in the case of being an employee of the company, it will be considered a violation of the company's code of



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conduct. The penalties If such actions cause damage to the company will consider taking legal action.

8) Responsibilities of the superiors above

If the complainant neglects or does not comply with this policy, the superiors above will also be subject to disciplinary action.

15. Asking for advice

Asking for advice for anyone who has questions or needs advice on the implementation of the Anti-Corruption Policy. can do as follows:

- 1) Consult with the company secretary
 - Telephone +662-4838888 ext.12999
 - Send electronic mail to Monthon.o@muangthaicap.com
 - Send a letter by mail
Mr. Monthon Onphan (Company Secretary)
Muangthai Capital Public Company Limited
332/1 Charansanitwong Road, Bang Plad Subdistrict,
Bang Plad District, Bangkok 10700
- 2) Applicants for advice can choose the address that will not reveal themselves however, by specifying the name of the recommender, it is possible to communicate feedback directly and quickly to the recommender.

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

.....
(Adm. Apichat Pengsritong)
Chairman of the Board of Directors



MUANGTHAI CAPITAL PUBLIC COMPANY LIMITED

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

Form: Attachment No. 1

Request Approval Letter

No...../.....

Date...../...../.....

1. I request as following matters:

.....
.....
.....

2. With the objectives of:

.....
.....
.....
.....

Sign _____ Requester
()

After consideration, the request is:

Approved.....

Not approved because.....

Payment with Cash

Check No.....

Sign _____ Requester
()



MUANGTHAI CAPITAL PUBLIC COMPANY LIMITED

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Form: Attachment No. 2

Gift Receiving Approval

I am _____ position _____,
approved receiving gifts in accordance with the gift or other benefit giving and receiving
policy.

Details: _____

From: _____

Receiving date: _____ approximate gift price _____

Business relationship : _____

After consideration, the gift should be:

- Distributed to all employees on (date) _____
- Charitable donation (please specify the donation agency) _____
- Others (please specify) _____

Receiver	Approver
Name : _____ Position : _____	Name : _____ Position : _____

INTIMATE SERVICES LIKE CLOSED FAMILY MEMBERS