

ANTI-CORRUPTION POLICY

1. Introduction

AGC Vinythai Public Company Limited (“Company”) commits to conduct its business in an ethical, fair, and honest way. The Company competes in the markets based on the quality and value of its products and services and does not use the exchange of money or anything of value to gain an unfair competitive advantage. The Company condemns and prohibits corruption in any form.

This Anti-Corruption Policy is an addendum to the Code of Conduct of the Company.

2. Definition

Corruption means any bribery whether offering, promising, giving, receiving, or soliciting of money or another item of value or any other advantage with the intention to influence the behavior of the recipient or improper abuse of power through any gifts or services, cash or in-kind, bribery of public official and private-to-private bribery.

As used herein, public officials shall mean any person in the position of legislative, executive, or judicial office of the state or any person working on the official duties to the state, its agencies, or enterprises whether appointed or elected as temporary or permanent position with or without any remuneration.

3. Scope

The Board of Directors, management and staff members must not act or accept any form of corruption, whether direct or indirect, for the benefits of anybody, including oneself, family, friends, or acquaintances. The scope of this policy covers the business of the Company in every country and all relevant parties. The Company also establishes procedures to regularly review the implementation of this Anti-Corruption Policy as well as regularly review the content of the policy and relevant guidelines to ensure that they are in compliance with changes in businesses, relevant rules, and applicable laws and regulations.

4. Roles and Responsibilities

- 4.1 The Board of Directors is responsible for establishing policies and monitoring the effectiveness of the anti-corruption system to ensure that the management is aware and effectively applies the anti-corruption policies and schemes as to embed them into the Company’s culture.
- 4.2 The Board of Directors is responsible for reviewing the financial reporting and accounting system, internal control system and risk management system to ensure the appropriateness, efficiency, effectiveness, and alignment with global standards.

- 4.3 The Managing Director and the management are responsible for determining the Anti-Corruption procedures as well as promoting and supporting Anti-Corruption initiatives, in order to communicate the policy to all personnel of the Company and any related parties. They are also responsible for reviewing the appropriateness of the anti-corruption procedures to align with any changes in the business, standards, laws, and regulations. The Managing Director will be responsible for establishing the practical procedures for implementing of the Anti-Corruption Policy under Article 6- Implementation Provisions – of this Policy.
- 4.4 The Legal and Compliance Division of the Company is responsible for the Anti-Corruption activities and for supporting the implementation of the company-wide Anti-Corruption program.
- 4.5 The Internal Audit Division is responsible for auditing and reviewing business operations for accuracy and compliance with policies, guidelines, delegation of authority, standards and relevant laws and regulations to ensure that the control system is appropriate and adequate for any potential corruption risk. The results of the audit shall be reported to Managing Director.
- 4.6 All Company Personnel are responsible for acting in accordance with the Anti-Corruption Policy and collaborating to communicate the relevant policies and guidelines within the Company as well as to relevant external parties.

5. Guidelines

- 5.1 The Board of Directors, the management and the staff members at all levels must act in accordance with the Anti-Corruption Policy and the Code of Conduct as well as relevant laws and regulations in Thailand and shall not be involved in any form of corruption whether direct or indirect.
- 5.2 The Company Personnel must report any action or suspicion that may constitute corruption. Each member of the Company Personnel must inform or consult with their supervisor or responsible person or Legal and Compliance division if they consider that it faces a case of corruption or has any doubt or interrogation in that regard. The Company Personnel shall also cooperate in any investigation or suspicion that may constitute corruption.
- 5.3 The Company shall treat fairly and provide protection to employees who refuse to participate in corruption or report actions or suspicions that may constitute corruption. No employee shall suffer any sanction, penalty, or any other adverse consequence of whatever nature for refusing to pay, receive or otherwise incur bribes, even if such refusal may result in the Company losing business
- 5.4 The Company is aware of the importance in communicating, sharing, and explaining to relevant parties who be involved with the Company, to act in accordance with this Anti-Corruption Policy. The Company will regularly communicate this policy to both internal and external parties.
- 5.5 The Company strives to establish and preserve the zero-tolerance stance toward corruption in every business transaction with both public and private sectors.

5.6 The Company gives importance to risk assessment as well as designing and implementing internal control systems by considering the Company's corruption risks.

6. Implementation Provisions

This Anti-Corruption Policy shall cover:

- **Human Resource Management processes** starting from recruitment, promotion, training, performance evaluation and providing benefits to employees. Supervisors at every level must communicate to their employees in order to apply this policy in the conduct of business transaction under their responsibilities.
- **Procurement processes** starting from vendor screening, selection, and evaluation. Fraud and corruption risks must be considered in designing internal control systems as well as establishing appropriate segregation of duties. Communication to vendors regarding the Anti-Corruption Policy must also be performed.
- **Sales and Marketing processes** starting from ordering, sales approval, price determination, as well as marketing vendor selection. Fraud and corruption risks must be considered in the design of the internal control system as well as in the establishment of appropriate segregation of duties. Communication to customers regarding the Anti-Corruption Policy must also be performed.
- **Accounting and Finance processes**, especially in maintaining books and records to ensure that expenses are recorded as incurred as well as there are no 'off-the-books' accounts, inadequately defined transactions, or false entries.
- **Other processes** in relation to contact with government or private sector officials. Fraud and corruption risks must be considered in designing internal control system as well as establishing appropriate segregation of duties.

Implementation on the Anti-Corruption Policy shall be aligned with guidelines in the Code of Conduct, Corporate Governance Charter, relevant standards, and operating manuals as well as additional guidelines that may be developed and endorsed in the future.

To ensure consistency in dealing with high-risk processes, all levels of the Company Personnel must conform carefully with the following practices and procedures to be promulgated by the Managing Director from time to time and implemented within the Company:

6.1 Political contribution

Political contribution is defined as financial support or donation of items and/or participation in activities as well as the Company's support for employees to attend political events on behalf of the Company to obtain any benefits. Political contribution is not permitted but does not include participation in political

activities by an employee on its own behalf. Nonetheless, the Company Personnel may not refer to the Company or use the Company's resources for any political activities.

The Company adopts a politically neutral policy, with no support or action that supports political parties, whether directly or indirectly, as well as the use of the Company's resources in activities that may cause the Company to lose its political neutrality and/or sustain damage by participating in such activities.

6.2 Donations

Charitable contributions, Donations, and Aid Grants (collectively called "Donations") may create risk to the Company when the activity refers to a payment but without constructive returns as such activities can become a claim or a means of corruption. To avoid any donations with a hidden agenda, the Company has established the following criteria for the donations as detailed below:

- Donations must have objectives for promoting the image of the Company by providing contributions to society so as to present corporate social responsibility as well as for supporting the success of projects without any expectation of favorable treatment in return that may appear as fraudulent or corrupt.
- Donations must prove that they do not involve a reciprocal return with anyone or any organization except an action to honor the donor as normally practiced, such as displaying our logo, mentioning the Company's name at an event or in the media for public relation purposes.

As such, the approval and review process for Donations must be in accordance with the Company's guidelines.

6.3 Sponsorships

Sponsorship is another type of business promotion that may create risk for the Company as sponsorships made to businesses may be difficult to detect and measure. In fact, sponsorships provided may potentially also link to corrupt activities. As such, the Company has established the following criteria for sponsorships as detailed below:

- It must be proved that the person soliciting the sponsorship for a project is actually running this project; that its action is to realize the project's purpose; and that the project has been created for the real benefit of the society without any expectation of favorable treatment in return that may appear as fraud or corruption.
- It must be proved that the project sponsorship or any other profit computable in a monetary value (such as accommodations and food) has nothing to do with a reciprocal return with anyone or any organization unless it is an announcement to honor the person as normally practiced in the business.

As such the approval and review process for sponsorships must be in accordance with the Company's guidelines.

6.4 Providing or Accepting of Gifts, Hospitality, and Other Expenses

The Company recognizes that fostering good relationships with business partners is essential to the Company's continued success. Thus, Gifts, Hospitality and Other Expenses may be provided or accepted if the following criteria are met:

- The value must not exceed:

Guidelines	Providing (THB/time/person)		Accepting (THB/time/person)	
Gifts	Government official	3,000	Government official	3,000
	Private sector	5,000	Private sector	1,000
Hospitality	Private sector	3,000	Government official	3,000
	Private sector	5,000	Private sector	3,000
Other Expenses	Government official	3,000	Government official	3,000
	Private sector	3,000	Private sector	3,000

- It must not be in the form of cash
- It must be provided in the Company's name, not employees
- It must comply with all relevant laws and regulations
- It must be appropriate to the circumstances such as giving gifts during New Year (as well as Thai and Chinese New Year) which is considered as customary in Thailand.
- It must be appropriate in type and value as well as given at an appropriate time (For instance, it is inappropriate to accept Gifts or Hospitality from companies engaging in a tendering process)
- It must be provided openly
- It must not be made with the intention to influence, induce, or reward any party in order to gain advantages or any expectation of favorable treatment in return that may appear as fraudulent or corrupt.

As such, the approval and review process of Gifts, Hospitality and Other Expenses must be done in accordance with the Company's guidelines.

6.5 Prevention of Misuse Inside information or Insight information

The Company has the policy to prevent the misuse of inside information or insight information, not yet publicized. Directors, management, employees, and related persons shall not use such inside information or insight information for their undue gains.

7. Raising Concerns

The Company has established secure and independent channels to report corrupt actions or suspicions as well as developed a whistle-blower protection process to protect whistle-blowers from retaliation in order to foster the confidence of Company Personnel in reporting any corrupt actions or suspicions. Therefore, the Company may report or seek advice either the followings depending on the subject matter of the question, concern, or suggestion, when encountering any action or suspicions that may constitute corruption:

1. Direct Superior
2. Legal and Compliance Division
3. AVT Hotline
 - Website: <https://agcvinythai.com/contact-us/> (click: Legal and Compliance)
 - E-mail: avt.helpline@agc.com
 - Tel.: 02-092-6474
 - Ext.: 6474
4. AGC Hotline
 - Website: <https://whistle.jp/AGC/>
 - E-mail: thai.helpline@agc.com

8. Disciplinary Actions

Any personnel participating in act or attempt of corruption is considered to be in breach of the Company's Code of Conduct and relevant internal regulations. Such personnel will receive disciplinary sanctions in accordance with the Company's regulations. Legal actions may be also applied for any violation of relevant laws.

This ANTI-CORRUPTION POLICY is approved by the Board of Directors Meeting

No. 1/2022 on July 1st, 2022. And it has been revised and approved by the Management Committee Meeting

No. 20/2024 on October 25th, 2024.