

Anti-Corruption Policy Practices

O.C.C. Public Company Limited

Dated August 11, 2025

O.C.C. Public Company Limited is committed to conducting business with honesty, integrity, transparency, and fairness, and is responsible for all stakeholders in accordance with the Company's principles of good corporate governance. We place great importance on combating corruption.

The Company has therefore established Anti-Corruption Policy Practices as guidelines for the Company's directors, executives, and employees.

Section 1

Definitions

“ Corruption” means performing or omitting duties, or misusing authority in one's position, including giving or accepting bribes, offering, promising, requesting, or soliciting property or other benefits from government agencies, private entities, or related persons, either directly or indirectly, to obtain any improper business benefits. Except in cases where laws, regulations, announcements, rules, local customs, or trade practices permit such actions.

“Government employees or government officials” means political office holders, civil servants, or local government officials. Those holding permanent positions or salaries, employees or individuals working in state enterprises or government agencies, local administrators and local council members who are not political office holders, officials under the Local Government Act, officials under the Local Government Act, and this includes directors, subcommittees, employees of government agencies, state enterprises, or government agencies, and individuals or groups of individuals who exercise or are authorized to exercise state administrative authority to carry out any legal action, whether established within the civil service, state enterprise, or other state enterprise.

" Bribery" means the offering of anything of value or any benefit with the intent to influence or influence the decision-making of those in authority or officials in responsible positions in a manner that favors the personal gain of the bribe giver. This is not only unethical but also a violation of the law. This includes not only cash payments, but also gifts or special services intended to influence the bribe recipient's decision-making in favor of the bribe giver. This can undermine transparency and fairness in management and operations in both the public and private sectors, and can also have both internal and external repercussions, including reputation, credibility, and legal risks.

Establishing an anti-bribery policy is crucial because it provides a clear framework for employees at all levels to refuse and report such actions. It also promotes a corporate culture of honesty and transparency at every step of decision-making and management.

Section 2

Responsibilities

1 . The Board of Directors is responsible for establishing policies and overseeing the establishment of effective anti-corruption systems to ensure that management prioritizes anti-corruption and instills it as a corporate culture.

2 . The Audit Committee is responsible for reviewing the financial and accounting reporting system, internal control system, internal audit system, risk management system, and potential corruption risks. It also oversees and reviews anti-corruption measures to ensure the Company's operations are effective and consistent with the anti-corruption policy.

3 . The Risk Management Committee is responsible for overseeing the assessment of risks throughout the organization, particularly related to corruption. It reviews risk management and anti-corruption measures to ensure their adequacy, and reports to the Board of Directors.

4 . The Corporate Governance and Sustainability Committee is responsible for overseeing compliance with corporate governance principles, anti-corruption policies, and measures, including reviewing them to ensure their appropriateness, timeliness, and effectiveness, and reporting to the Board of Directors.

5 . The Executive Committee is responsible for establishing a system and promoting and supporting the anti-corruption policy, communicating it to employees and all relevant parties, and reviewing the appropriateness of the systems and measures. To align with changes in business practices, laws, company regulations, work regulations, rules, announcements, and other measures (if any).

6. The Internal Audit Office is responsible for auditing and reviewing operations to ensure that the internal control system is appropriate and adequate for corruption risks.

7. Supervisors at all levels are responsible for overseeing their units under their responsibility to ensure compliance with the anti-corruption policy, anti-corruption policy compliance, and related regulations, as well as communicating and disseminating information to subordinates.

8. Employees are responsible for complying with the anti-corruption policy, anti-corruption policy compliance, and related regulations, including reporting or providing information regarding corruption.

Section 3

Guidelines

1 . The Company provides communication, understanding, and training regarding the Anti-Corruption Policy, the Anti-Corruption Policy's practices, and related regulations to Company Directors, Executives, and Employees.

2. Company Directors, Executives, and Employees at all levels acknowledge and comply with the Anti-Corruption Policy, the Anti-Corruption Policy's practices, and related regulations without exception.

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3. Company Directors, Executives, and Employees shall not neglect or ignore any acts that may constitute corruption related to the Company. They shall report such information or clues through the Company's designated channels and cooperate in fact-finding investigations.

4. Employees who have doubts or are unsure whether an act may constitute corruption shall consult and seek advice from their direct supervisor or higher-ranking supervisor.

5. The Company establishes a sales and marketing system that adheres to honesty, integrity, and fairness. They shall not engage in any acts that violate customer rights, including the preservation of customer trade secrets. It shall not be used for personal or related parties' benefit in an improper manner.

6. The Company prohibits employees at all levels from soliciting, giving, or accepting bribes, engaging in, or accepting corruption, including any other benefits of a similar nature, from government and private sector officials, either directly or indirectly, as an incentive to influence or obtain unlawful benefits, whether for personal or others' benefit.

7. The Company establishes a fair and transparent procurement system for goods or services, maintaining standards, and conducting thorough and appropriate business partner evaluations.

8. The Company establishes a transparent and fair human resource management system, reflecting its commitment to combating corruption, from recruitment, training, performance evaluation, compensation, promotion, and punishment.

9. The Company maintains a comprehensive accounting and data recording system that is ready for auditing to verify the accuracy and appropriateness of financial reports. Documentary evidence supporting every step of the operation is sufficient and complete, in accordance with relevant standards, principles, and laws.

10. The Company establishes an audit system, internal control system, and risk management. To ensure the Company's work systems are robust and adequate, and to prevent corruption,

11. Directors, executives, and employees at all levels who violate or fail to comply with the Anti-Corruption Policy will be subject to disciplinary action under the Company's disciplinary measures and will face both civil and criminal penalties if the action is illegal.

12. The Company communicates the Anti-Corruption Policy to subsidiaries, affiliates, and business partners. It also disseminates information, educates, and equips other individuals whose duties are related to the Company or may impact the Company, ensuring their awareness and compliance with the Anti-Corruption Policy.

13. The Company disseminates information, educates, and equips external individuals whose duties are related to the Company or may impact the Company, ensuring their awareness and compliance with the Anti-Corruption Policy.

14. The Company publicly discloses the Company's Anti-Corruption Policy, including channels for reporting clues or complaints via the Company's website and annual report.

15. The Company requires an annual review of the appropriateness of the Anti-Corruption Policy and related regulations.

Section 4

Forms of Corruption

1 . Political Contributions refers to financial or other forms of assistance to support political activities, such as providing goods or services, advertising, promoting, or supporting political parties. Purchasing tickets to fundraising events or donating money or goods to organizations with close ties to political parties, including encouraging employees to participate in political activities on behalf of the company, is prohibited to gain business advantages.

Guidelines

1.1 The company adheres to the democratic regime with the King as Head of State and has a policy of political neutrality. It will not support or take any action that favors any particular political party.

1.2 If the company wishes to make political contributions, it must do so for the promotion of democracy and in accordance with relevant laws. It is not expected to gain any business benefits and must comply with the company's regulations.

1.3 Company directors, executives, and employees have the right and freedom to participate in political activities under the provisions of the law. They must be cautious about any actions that may lead the public to believe that the company supports or favors any particular political party.

2. Charitable donations or donations refer to the giving or receiving of financial or other forms of assistance as part of social contribution activities, public relations efforts, and enhancing the company's image, without expecting any business gain in return.

Guidelines

2 .1 Charitable donations must be made in the name of the company, to foundations, charitable organizations, educational institutions, religious institutions, hospitals, or credible organizations for social benefit. Care must be taken to ensure that these donations are not used as a means of bribery.

2 .2 Charitable donations must be made transparently and in accordance with Company regulations.

2.3 The Company has a policy of not accepting donations for any corporate benefit, except for donations to assist victims of floods, storms, fires, or other natural disasters, or for charitable purposes.

3 . Providing or receiving support refers to providing or receiving financial or other assistance for the purpose of promoting the company's business, brand, or enhancing the company's image, such as supporting educational, artistic, and cultural activities. This support does not include promotional support under contracts or commercial agreements.

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3.1 Providing or receiving support must be done on behalf of the company.

3.2 Providing or receiving support must ensure that the support will not be used as a means of evading bribery. The process must be transparent and in accordance with applicable laws.

3.3 Disbursement of support expenses must be in accordance with the company's regulations.

4. Gifts, presents, entertainment, and hospitality expenses refer to the giving or receiving of items or other benefits, the giving or receiving of entertainment, or hospitality services to build good relationships with business partners.

Guidelines

4.1 Company directors, executives, and employees must not solicit or request gifts, entertainment, or hospitality services from customers, business partners, or other stakeholders.

4.2 Company directors, executives, and employees may provide or receive gifts, entertainment, or hospitality services to or from any person. The criteria are as follows:

1) Comply with business ethics, company regulations, and relevant laws.

2) The gift must be given or received in the name of the company, not on a personal basis, and must be openly given.

3) The gift must not be in the form of cash or cash equivalents, such as gift cards or vouchers, except in cases where the company expresses condolences, in which case cash may be given. The company's procedures must be followed.

4) The value must be appropriate and consistent with the time, place, and situation, such as gifts given during festivals, which are considered normal customs.

5) Gifts, entertainment, and hospitality must not be given or received during important or high-value commercial agreements, such as auctions, bidding, or tenders.

4.3 Disbursement of gifts, entertainment, and hospitality services must be in accordance with company regulations.

4.4 Acceptance of gifts and souvenirs, as per customary practices, with a value not exceeding 5,000 baht, is acceptable.

5. Facilitation payments refer to small, informal payments made to government employees or officials to ensure that they will proceed with a process or to expedite the process. These payments do not rely on the employee's or official's discretion and are considered a legitimate and dutiful action. This includes rights the Company is entitled to by law, such as applying for licenses, certificates, or receiving public services.

Guidelines

5.1 The Company has a policy prohibiting the payment of facilitation payments of any kind, directly or indirectly, to government employees or officials. Furthermore, it will not take any action and will not accept any action in exchange for facilitating business operations.

6 . Conflict of Interest refers to situations or actions that directly or indirectly conflict with the Company's interests.

Guidelines

6 .1 Company directors, executives, and employees should prioritize public interest over personal interest and must perform their duties for the benefit of the Company.

6.2 The Company monitors transactions with persons with conflicts of interest in accordance with the principles of good corporate governance, business ethics, and the announcements of the Capital Market Supervisory Board and the Stock Exchange of Thailand.

7 . Business Relations and Procurement with the Public or Private Sector refers to the Company's operations in dealing with the public sector, government officials, or the private sector to obtain work or goods for the desired purposes.

Guidelines

7 .1 Company directors, executives, and employees must operate with transparency and honesty, in accordance with regulations, announcements, Company rules, and relevant laws.

7.2 Company Operations All dealings with the public or private sector must be transparent, honest, and conducted in accordance with procurement regulations and related laws. Bribes must not be given or received in any business transactions.

8 . Employment of government employees or government officials refers to the company's hiring of government personnel, former government employees, or former government officials to serve as consultants, directors, executives, or employees of the company. This also applies to the company's personnel engaging in policy-making work within the public sector, which may create a risk of corruption due to conflicts of interest between these individuals who hold roles in both organizations. These individuals may act impartially or attempt to push for government policies that benefit the company.

Guidelines

8.1 Hiring of Government Employees or Officials

1) The Company has a background check process for individuals to be recruited to serve as advisors, directors, executives, and employees to examine potential conflicts of interest prior to appointment or employment.

2) Hiring and remuneration approval for government employees or officials must comply with Company regulations and relevant laws, carefully considering the reasons and necessity.

3) Information on hiring government employees or officials must be disclosed in the Company's Annual Information Form/Annual Report (Form 56-1 One Report).

8.2 Personnel Serving Government Agencies

1) Personnel may perform duties to assist with policy-related matters for government agencies. The Company must notify the Company immediately upon appointment.

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2) In the event that a person employed by the Company is involved in government policy-related matters, they must perform their duties with due care and diligence, in accordance with the law and ethics, to prevent abuse of power or conflicts of interest.

3) Information on persons employed by the Company for government agencies must be disclosed in the Company's Annual Information Form/Annual Report (Form 56-1 One Report).

Section 5

Whistleblowing or Complaints

If anyone has any information regarding corruption, illegal acts, or violations of the Code of Conduct, or observes any deficiencies in the Company's internal control systems that may pose risks or damage to the Company's operations, they may report their information directly to the Company through the following channels:

Complaint Recipient

1. Trusted supervisors at all levels
2. Audit Committee Member - Email: auditcommittee@occ.co.th
3. Internal Audit Manager - Email: audit@occ.co.th
4. Human Resources Manager - Email: voice@occ.co.th
5. Company Secretary - Email: law@occ.co.th

The Company certifies that these individuals are reliable sources of information and can be contacted for advice and consultation regarding any activities, transactions, or other matters that may involve or have the potential to lead to corruption.

Complaint Procedure

1. Complaints may be made directly, verbally or in writing
2. Via the recipient's email address
3. By post to the recipient at the Company's address, 729/4-7 Radchadaphisek Road, Bang Phong Phang Subdistrict, Yan Nawa District, Bangkok 10120
4. Submit complaint letters to the complaint box provided by the company within the company building.
5. Submit via the chat application system on the company's various platforms.

The Company Secretary will maintain monthly statistics on complaints received through various channels and compile a report.

All complaints or tips must be polite and include the following details:

1. Full name of the complainant
2. Facts about the offense, evidence, relevant details, and attachments (if any)
3. Full name of the complainant

Handling of Reported or Complaints

- The complainant will investigate and gather facts. They may also assign a trusted individual or agency to investigate the facts and gather documents received through these channels. **If there is a**

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basis, the matter will be presented to the Managing Director for consideration, who will appoint an investigative committee to review the complaint, summarize all recommendations and issues, and propose to the Managing Director for approval of appropriate and fair punishment or mitigation measures for the injured party. The Managing Director will report the results to the Board of Directors. The review period will be determined by the following case:

- General Cases The processing time is 30 days.
- In urgent cases, cases where damages are expected to exceed 1 million baht, or where business opportunities are lost, or where the company's reputation or image is affected, the processing time is 15 days.
- In cases where a company director or executive is the subject of a complaint, the matter must be submitted to the Chairman of the Board or the Chairman of the Audit Committee for consideration and appointment of an investigative committee to review the complaint, summarize all recommendations and issues within 30 days, and report the results to the Board of Directors.
- The individual who initially received the complaint will then report the results to the whistleblower within 7 days of the Board's resolution on the complaint.
- In cases where there is sufficient evidence to demonstrate that the whistleblower or complainant filed the complaint with dishonest intent, the following penalties may be imposed:

1. In cases where the whistleblower is an employee, an investigation will be conducted to determine disciplinary action in accordance with the company's work regulations.

2. In cases where the whistleblower is an external party and the company has suffered damage, the company may consider taking legal action against the whistleblower or complainant.

The Company has established the following protection measures for whistleblowers or complainants:

1. The Company will keep information about whistleblowers or complainants confidential and disclose it only as necessary to protect their safety and prevent potential damage. (If the whistleblower does not disclose their name or surname, they must provide sufficient details of the facts or evidence clearly demonstrating the alleged corruption or wrongdoing.)

2. The whistleblower or complainant may request protection as necessary and appropriate.

3. The Company will not demote, punish, or inflict negative consequences on any employee who makes a complaint or denies corruption, even if such action causes the Company to lose business opportunities.

4. Those who have suffered harm will receive relief through fair and appropriate methods or processes.

The Company will not accept complaints for the following reasons or actions:

1. Cases where the Company has already accepted or finalized a decision, and there is no new, substantial evidence.

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2. Cases where the complainant has been out of the Company's employment for more than five years.

3. Cases where no evidence or evidence clearly indicates corrupt behavior sufficient to conduct an investigation.

4. Cases where the details of the complainant and/or complainant are not provided.

Confidentiality

The Company will keep all information obtained from whistleblowers or complaints confidential and will not disclose it to any unrelated parties, except when necessary during the investigation, inquiry, prosecution, witness testimony, or cooperation with the court or government agencies with legal authority.

Section 6

Training and Communication

The Company will regularly educate and organize training on anti-corruption through various channels, such as orientation courses, seminars, the Company's electronic media, and announcements. This will ensure that directors, executives, and employees are aware of the anti-corruption policy in all forms, how to report or report corruption if they see or suspect corruption, and understand the penalties for violating the policy.

The Company will communicate the anti-corruption policy and procedures through appropriate channels to subsidiaries, associate companies, business partners, customers, shareholders, and other stakeholders.

For business partners with whom the Company will communicate and comply with the anti-corruption policy, the Company will consider whether they are currently business partners. If they remain, they will receive all communications. The Company requests that these business partners respond to or respond to the Company's communications to demonstrate their awareness. Cooperation and mutual adherence to the Company's anti-corruption policy is in accordance with the Company's good faith. However, if such business partners no longer become business partners with the Company for any reason, the Company will not communicate this policy.

Section 7

Penalties

The Company will take disciplinary action against directors, executives, and employees who commit offenses, threaten or intimidate, or neglect to commit offenses, or violate or fail to comply with the anti-corruption policy. The Company will consider disciplinary action based on the severity of the offense, with the same standard, ranging from a written warning to termination or removal from office, as well as civil and criminal liability under the law.

If a business partner or any person involved in the Company's business fails to comply with the anti-corruption policy and its practices, whether they are the perpetrators, ignore the offense, or

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provide false information, the Company may consider terminating the contract or terminating the business partnership.

Section 8

Others

Lack of awareness of the anti-corruption policy and these practices, or related laws, cannot be used as an excuse for compliance.

This revised Anti-Corruption Policy (3rd Amendment) was approved by the Board of Directors Meeting No. 4/2025 on 11 August 2025 and is effective from 13 August 2025 onwards.

(Mrs. Kanchana Saisiriporn)

Chairman of the Board

(Prof. Kamphol Panyagometh, Ph.D.)

Chairman of the Audit Committee