

## Organizational Data Management Policies and Practices

### 1. Risk management policy

Applied DB Public Company Limited realizes the importance of risk management in business operations and management. Effective risk management can eliminate or control factors that may cause negative impacts or damage or hinder the achievement of the set goals to an acceptable level. It can enable the Company to achieve its business goals, create customer satisfaction and provide good returns to shareholders and all stakeholders, and cause the least damage or loss, and also enable the Company to operate its business steadily and continuously. The risk management policy is as follows:

- 1) Promote effective risk management by having a risk management committee, internal control unit that is independent from the unit responsible for operations and has defined duties and responsibilities from executives and employees at all levels, with a clear reporting hierarchy, which supports the creation of a culture of risk awareness throughout the organization.
- 2) Create understanding, awareness and shared responsibility for risks, control and impacts of risks on the Company in the management process and operations of employees and executives at all levels throughout the Company.
- 3) Provide a process, guidelines and measures for risk management that are of quality, appropriate at the international level and sufficient, including the identification, analysis, assessment, prioritization, management, control, monitoring, reporting, evaluation and communication of information about risks continuously, consistently and throughout the Company.
- 4) Determine the assessment of all categories according to the impacts that may occur to the Company's limits, both financial and non-financial, such as strategic risks that threaten the achievement of the Company's strategic objectives and reputational risks that threaten ADB's reputation, including emerging risks that may pose a threat in the future.
- 5) Determine the organization's acceptable risk (Risk Tolerance) to limit potential damages to a level that the Company can accept, including specifying events or risk levels that are warning signs for operators to take one of the following actions. To prevent risks from exceeding the specified risk ceiling.
- 6) Establish guidelines and procedures for responding to risks, which may consider avoiding certain risks that do not have a risk management system to support or cannot effectively manage such risks. On the other hand, ADB may consider using risk management tools or strategies to mitigate or transfer risks. Guidelines and procedures for responding to risks must be consistent with the nature of the business and the readiness of the Company's resources, personnel and information systems.
- 7) Establish written procedures for executives and operators to adhere to, which is a means of controlling operational risks.

### 2. Internal control policy

Applied DB Public Company Limited places importance on internal control systems for both management and operational levels. Therefore, the scope of duties and authority have been clearly defined in writing. The use of assets is supervised to maximize benefits and the responsibilities for approval, recording of accounting and information items, and storing assets are separated to create appropriate

checks and balances. In addition, there is internal control over the financial system. The company has a financial reporting system submitted to the responsible executives. The internal audit department is responsible for examining the internal control system and reporting directly to the audit committee.

The Company has set clear business goals and can measure the performance. The management and executives will compare the actual performance with the set goals every quarter. The Company will assess both external and internal risk factors found in the operation, analyze the factors that are the cause, and determine measures to monitor the events that are the cause of the risk factors, including measures to reduce the risk. The Company also assigns the relevant departments to continuously monitor the risks and report the progress to the Board of Directors. In the Board of Directors' meeting, which was attended by all three Audit Committee members, the Board of Directors assessed the adequacy of the Company's internal control system by questioning the management and concluded that from the assessment of the Company's internal control system in 5 areas, it consisted of:

- 1) Organizational Control and Environmental Measures
- 2) Risk Management Measure
- 3) Management Control Activities
- 4) Information and Communication Measure
- 5) Monitoring System

### 3. Anti-corruption Policy

Applied DB Public Company Limited prohibits the Company's directors, executives and employees from engaging in or accepting corruption in any form, directly or indirectly, covering all businesses and all related departments, and requires appropriate and consistent review of compliance with the anti-corruption policy, as well as reviewing the guidelines and operating requirements to be consistent with changes in business, regulations, rules and legal requirements, with the following guidelines:

- 1) Do not engage in any behavior that indicates an intention to commit corruption, give or receive bribes to government officials and private individuals or stakeholders related to the Company in order to obtain or maintain business or competitive advantages or for the benefit of oneself and those involved.
- 2) Do not neglect or ignore when encountering any acts that are considered corruption related to the Company. It is a duty to notify the supervisor or responsible person and cooperate in investigating the facts.
- 3) The Company will provide fairness and protect persons who deny corruption or provide clues about corruption to the Company as specified in the measures to protect complainants or those who cooperate in reporting corruption.
- 4) The Company realizes the importance of disseminating, providing knowledge and creating understanding for persons who must perform duties related to the Company or may affect the Company in matters that must be performed in accordance with the anti-corruption and corruption policy.
- 5) The Company provides appropriate and efficient internal control processes and systems on a regular basis to prevent corruption.

- 6) The Company provides a human resource management process that reflects the Company's commitment to anti-corruption and corruption measures from selection, training, performance evaluation. Reward and promotion
- 7) Those who commit corruption are considered to be committing unethical acts, which shall be considered and punished according to the Company's employee disciplinary regulations as specified and may be subject to legal punishment if such acts violate the provisions of the law.

#### 4. Policy on prevention of conflicts of interest

Applied DB Public Company Limited has set policies and procedures for related party transactions as important tools or mechanisms to enable the Company to have good corporate governance. The purpose of setting policies and procedures for related party transactions is to ensure that all related party transactions of the Company are transparent, have no conflict of interest, are approved by the management, the Board of Directors or the shareholders' meeting, and are disclosed correctly and completely for the maximum benefit of the Company and its subsidiaries.

The rules and procedures for making transactions between each other or related transactions are as follows:

- 1) Directors and executives of the Company shall prepare a report of their or related persons' interests and notify the Company so that the Company has information for internal use in implementing the regulations regarding related party transactions.
- 2) Avoid related party transactions that may cause conflicts of interest. In the event that a related party transaction is necessary, it must be presented and approved by the management, the board of directors, or the shareholders' meeting (as the case may be), except for transactions that are commercial agreements of the same nature as those that a reasonable person would make with a general contracting party in the same situation, with commercial bargaining power that is free from influence from the status of the director, executive, or related person, as the case may be, and are commercial agreements that have been approved by the board of directors or in accordance with the principles approved by the board of directors.
- 3) In considering related party transactions, the Company shall set prices and conditions of related party transactions as if they were made with an external party (Arm's length basis), which must be fair and reasonable. The price of the product or service must be compared with the external price under the same or similar conditions and must comply with the manual of approval and implementation authority. As for the financial assistance or granting of assistance, it must be necessary. Reasonable and must have terms and conditions that provide maximum benefit to the Company.
- 4) In the event that there is no such price criteria for reference, the Company shall compare the price of the same product group and/or consider comparing the price of the product or service with external prices under the same or similar conditions.
- 5) The Company may utilize the report of an independent appraiser appointed by the Company to compare prices for important related party transactions to ensure that such prices are reasonable and for the maximum benefit of the Company and its subsidiaries.

- 6) If the Company has related party transactions or other related party transactions that fall under the requirements of the Stock Exchange of Thailand, the Capital Market Supervisory Board, and the Securities and Exchange Commission, it must strictly comply with such requirements.
- 7) There shall be a review of related party transactions according to the audit plan, whereby the internal audit unit shall report to the audit committee and have a standard of control, inspection, and supervision to ensure that random inspection of transactions is true, correct, and in accordance with the contract, policy, or specified conditions.

## 5. Insider Trading Policy

Applied DB Public Company Limited has set additional policies on the use of the Company's inside information for directors, executives and employees, with the following details:

- 1) Do not disclose inside information to other persons, directly or indirectly, and by any means, knowing or should know that the recipient of the information may use such information to buy or sell securities or enter into futures contracts related to securities, whether for themselves or others, except in the case of actions that do not take advantage of other persons or in the manner specified by the Securities and Exchange Commission.
- 2) Do not use the Company's inside information to seek benefits in trading the Company's securities or provide such information to other persons to trade the Company's securities. Must keep the secret and not trade the Company's securities or perform any legal acts or seek benefits in any form that may affect the price change of the Company's securities from the information that they know, which is an illegal act.
- 3) Do not disclose the Company's trade secrets to other persons, especially to the Company's competitors.
- 4) Do not disclose customers' confidential information until receiving written permission from the customer.
- 5) Persons who know or possess inside information related to the Company are prohibited from Trading in securities of the Group of Companies within 30 days prior to the disclosure of quarterly and annual financial statements or the disclosure of inside information to the public and within 24 hours after such inside information of the Company has been disclosed to the public and other periods as determined by the Company from time to time.
- 6) In special circumstances, persons who know or possess inside information related to the Company may sell securities of the Group of Companies during the blackout period if they are in a situation such as severe financial hardship or have to comply with various legal requirements or are under a court order, provided that a record is always kept stating the reasons and further approval is sought.
- 7) The Company has established measures to prevent the exchange of inside information of the Company to related persons, including directors, senior executives and employees in related departments (including spouses, minor children and persons living together as husband and wife).

## 6. Whistleblowing and Complaint Policy

Applied DB Public Company Limited places importance on transparent and auditable corporate governance and has a guideline for conducting business with ethics in accordance with the principles of good governance. The Company has therefore established the Whistle Blowing Policy, which aims to be a

channel for all stakeholders to file complaints or report any information about fraud or other wrongdoings that directly affect the Company, its employees, their interests or feelings, such as any illegal acts, acts that violate the Company's policies or acts that violate business ethics, in order to enhance cooperation, improve and amend for correctness, appropriateness and transparency, which will benefit the Company and all parties involved.

■ **Internal channels (for company personnel)**

- Trusted supervisors at all levels
- Chief Executive Officer (CEO)
- Any director of the Company
- Internal Control Unit
- Human Resources and Development Department
- Submitting written reports and complaints via email at [adb\\_cg@adb.co.th](mailto:adb_cg@adb.co.th). The email will be sent to the Chief Executive Officer, Director of Human Resources and Development, Company Secretary and Internal Control Unit
- Suggestion boxes (red boxes) installed at the security booths of every branch of the Company
- Sending letters to the above persons to  
Applied DB Public Company Limited  
No.252 Moo 4, Sukhumvit Road, Prakasa, Muang, Samutprakan 10280

■ **Channels for external parties**

- 1) Via telephone, contact the Company Secretary and Internal Control Unit at 02-709 4040 ext. 1097-1099.
- 2) Via E-mail
  - Chief Executive Officer, Director of Human Resources and Development, Company Secretary and Internal Control Unit [adb\\_cg@adb.co.th](mailto:adb_cg@adb.co.th)
  - Internal Control Unit [adb-ia@adb.co.th](mailto:adb-ia@adb.co.th)
  - Company Secretary Unit [adb-cs@adb.co.th](mailto:adb-cs@adb.co.th)
  - Investor Relations Unit [adb-ir@adb.co.th](mailto:adb-ir@adb.co.th)
- 3) Send the letter to the Audit Committee or the person you wish to send it to:  
Applied DB Public Company Limited  
No.252 Moo 4, Sukhumvit Road, Prakasa, Muang, Samutprakan 10280

The above complaint channels can be filed in the following cases:

- 1) Found a violation of good corporate governance, ethics or the Securities Act
- 2) Found a violation of corruption
- 3) Found a violation of the environment
- 4) Found a violation of drugs
- 5) Found a violation of human rights
- 6) Found other violations that affect the company's operations and stakeholders

■ **Measures to protect whistleblowers or complainants**

Whistleblowers, complainants or those who cooperate in the investigation will receive appropriate and fair protection from the Company as follows:

- 1) The Company will keep the information and identities of whistleblowers, complainants, accused persons, and those who cooperate in the investigation confidential. The relevant persons who are aware of the matter or information related to the complaint must keep the information confidential and not disclose it to other persons, except when it is necessary to disclose it according to the requirements of the law.
- 2) The Company will disclose information only as necessary, taking into account the safety and damage of the reporter, source of information or related persons.
- 3) Whistleblowers, complainants and those who cooperate in the investigation of facts will receive rights protection, whether they are Company personnel or external persons, in order to be safe and not be harassed.
- 4) The Company will not act unfairly towards whistleblowers, complainants or those who cooperate in the investigation of facts, such as transferring, changing positions, changing the nature of work or workplace, suspending work, threatening, interfering with work, terminating employment or taking any other action that is considered improper and unfair.

## 7. Policy on control and supervision of subsidiaries and affiliated companies

Investment in subsidiaries and affiliates of Applied DB Public Company Limited must apply for approval in accordance with the announcement of the Capital Market Supervisory Board on the criteria for significant transactions that are considered as acquisition or disposal of assets and the announcement of the Stock Exchange of Thailand on the disclosure of information and operations of listed companies in the acquisition or disposal of assets B.E. 2547, and such investment will be considered and approved by the meeting of the board of directors and the shareholders' meeting in accordance with the Company's regulations or as specified by law

The Company will send persons who have been approved by the Board of Directors to join as directors and executives in subsidiaries and/or affiliates, whereby the Company's Board of Directors will jointly consider the qualifications and experience appropriate for the type of business to represent the Company in holding the position of director in such subsidiaries and/or affiliates in order to set important policies and control the operations of subsidiaries and/or affiliates.

## 8. Disclosure of information to the public

ADB disclosure is based on the principles of fairness, transparency and accountability in line with good corporate governance. The ADB Disclosure Handbook is therefore developed to assure shareholders, investors, the public and other stakeholders that ADB's disclosure is accurate, clear, complies with the law and is equitable.

### ■ Persons with authority to disclose information

The CEO, the top executive responsible for finance and/or the person assigned to act as an investor relations officer (Investor Relations) may consider and make decisions on the content of material information for consideration of disclosure, by explaining the information himself or may assign a related person to explain.

The person assigned to act as an investor relations officer (Investor Relations) has the authority to issue press releases to disseminate material information of the Company, answer questions from

shareholders, investors and securities analysts, and coordinate directly with the owner of the information to disseminate material information of the Company through the media.

■ **Disclosure standards**

- Material Non-public Information must be disclosed carefully, accurately, completely, and timely, and must ensure that shareholders or investors receive sufficient, equal, and easily accessible information. ADB's website may be considered for disclosure, as appropriate. However, caution should be exercised regarding the timing of disclosure.
- Forward-Looking Information must be disclosed carefully, with an explanation of the conditions or assumptions used in making such a forecast.
- Material Public Information must be disclosed clearly and completely, without causing confusion. In addition, additional information must be provided regarding material information that has already been disclosed, in a clear and consistent manner, and must not cause misunderstanding with information that has already been disclosed.
- Other non-material information must be disclosed based on facts and must not be intended to cause others to misunderstand the facts regarding financial status, performance, and price of securities, or disclosed in a manner that may cause others to misunderstand the price of securities to increase or decrease.
- Disclosure of information that may cause ADB to be affected in business or competition. Please take special care with information such as product cost, market share information, etc.

## 9. Information Security Policy

Applied DB Public Company Limited is committed to maintaining the standards of work systems, computer systems, and data communication systems, which are important foundations for creating an effective control system. The Company will take action in various matters to ensure that data and computer systems are protected and ready for use at all times in the Company's business, including the design and cost of various measures for controlling and supervising in accordance with the appropriateness of the risks of data, work systems, and computer systems.

- 1) Any invention that employees invent or jointly invent while they work with the Company is considered the right and property of the Company. Employees may not disclose or use it for their own benefit.
  - 1.1) Data means electronic data and data in the form of documents, publications, image/audio data, etc.
  - 1.2) Work systems cover data systems and the use of computer systems.
  - 1.3) Computers cover computer systems, communication systems, and related computing devices.
- 2) To achieve such commitment, the Company will operate in accordance with standards and regulations by specifying the responsibilities of users and data administrators of all work systems and computer systems. By doing as follows:
  - 2.1) Assess risks and create a risk control system that is appropriate for the changing environment.
  - 2.2) Create a system to protect information, work systems, computer systems and related personnel.
  - 2.3) Create a data protection system to prevent unauthorized access, modification and destruction of information, whether by accident or intention.

## 10. Business Confidentiality Policy

Applied DB Public Company Limited has a policy prohibiting the company's employees from disclosing or using for personal gain any news, inventions that are the company's secrets, including formulas, processes, production methods and important business information that is considered to be confidential to others in any way.

- 1) Any invention that employees invent or jointly invent while they are working with the company is considered the right and property of the company. Employees cannot disclose or use it for personal gain.
- 2) Use the company's assets to the fullest benefit of the company and take care not to let them be damaged or lost, including not using the company's assets for the benefit of themselves or others.
- 3) Do not do anything that infringes the intellectual property of the company or others, including not using pirated software in the company.
- 4) Keep the company's secrets and take care not to let the company's confidential documents or information leak or fall to unrelated persons, which may cause damage to the company.
- 5) Do not disclose or use any news that is the company's business secrets, including formulas, processes, production methods. Business information and important news that are considered confidential by the Company from other persons by any means
- 6) Do not use your power or allow other persons to use your power to seek benefits for yourself or others inappropriately
- 7) Do not do anything that causes damage to the image and reputation of the Company

  
Mr. Wang Wanapaison  
Chief Executive Officer