




บริษัท แอปพลาย ดีบี จำกัด (มหาชน)
APPLIED DB PUBLIC COMPANY LIMITED

CONFLICT OF INTEREST

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Conflict of Interest

Applied DB Public Company Limited and its subsidiaries prioritize the consideration of various items transparently and beneficially to the Company. Therefore, it emphasizes the prevention of items that may be a conflict of interest, related items or inter-company items by setting guidelines, prohibitions and considerations to enable the Company's directors, executives and employees to understand how to comply with the Conflict of Interest Policy. In addition, the words used in this policy shall have the meanings specified in the Public Limited Company Act, the Securities and Exchange Act and the rules, announcements and orders of the Securities and Exchange Commission, the Capital Market Supervisory Board, the Office of the Securities and Exchange Commission and the Stock Exchange of Thailand ("Securities Act")

The Company has therefore established a policy to prevent conflicts of interest of the Company's personnel in contacting business partners and other persons, which will affect the Company's operations. In order to maintain the highest benefits of the Company, shareholders and stakeholders, the Company has established this policy.

Objective

To determine the criteria, conditions and methods for reporting the interests of directors, executives and related persons in accordance with Section 89/14 of the Securities and Exchange Act B.E. 2535, as amended by the Securities and Exchange Act (No. 4) B.E. 2551, which requires directors and executives to report to the Company their or related persons' interests, which are interests related to the management of the Company's or its subsidiaries' business, as follows:

1. To provide the Company with information to support its operations in accordance with the regulations on related party transactions, which are transactions that may cause conflicts of interest and may lead to the transfer of interests of the Company and its subsidiaries. In addition, directors and executives must perform their duties with care and honesty (Fiduciary Duties), which means making decisions without direct or indirect interests in matters to be decided.
2. To benefit the monitoring of the interests of directors and executives of the Company or related persons, which are interests related to the management of the Company or its subsidiaries, the Company's directors and executives must report such interests in accordance with the criteria and methods set by the Board of Directors.
3. To create understanding among directors, executives and employees about situations that may lead to conflicts of interest, which are unethical and illegal.
4. To serve as a guideline for directors. Executives and employees can exercise discretion to prevent and resolve conflicts of interest that may arise on the basis of morality and honesty for the benefit of the Company and its subsidiaries.
5. To establish good corporate values and culture that prioritizes customers by conducting business and providing services as professionals, taking into account the interests of customers (Putting Investor First) and the interests of customers must be above the interests of the Company, related persons and shareholders.
6. To enable the Company and its subsidiaries to have good self-governance (Self-Discipline) in preventing, managing and controlling actions that may cause conflicts of interest arising from business operations that



are effective and consistent with the Company's business model and risks, and to be able to comply with relevant criteria appropriately.

Scope

Personnel of Applied DB Public Company Limited and its subsidiaries, including personnel related to the Company, must strictly comply with this policy.


Definition

1. **"Company"** means Applied DB Public Company Limited and its subsidiaries.
2. **"Directors"** means Directors of Applied DB Public Company Limited and its subsidiaries.
3. **"Personnel"** means Directors, executives and employees of Applied DB Public Company Limited and its subsidiaries.
4. **"Related persons"** means persons close to or juristic persons who are related to the Company's personnel, including:
 - 1) Persons related by blood, marriage or legal registration, including father, mother, siblings, spouses or persons who live together as husband and wife and children, including adopted children.
 - 2) Legal entities in which personnel, spouses of personnel or persons who live together as husband and wife with personnel or children who are underage of personnel are partners.
 - 3) Legal entities in which personnel, spouses of personnel or persons who live together as husband and wife with personnel or children who are underage of personnel. Holding shares in total of more than 30 (thirty) percent
 - 4) A juristic person that personnel have the authority to manage as a representative of the juristic person
5. **"Conflict of interest and conflict of interest"** means any action that is a conflict between the personal interests of personnel or those related to the interests of the Company and/or subsidiaries and affects the decision-making in performing duties of personnel and may cause dishonesty in performing duties or making decisions that are not transparent.


Guidelines

The Company has established guidelines on disclosure of information on stakeholders of directors and executives for transparency and to prevent conflicts of interest, as follows:

1. All directors, executives and employees should disclose any business or activity that they conduct personally or with their families, relatives, siblings or dependents that may cause a conflict of interest with the Company or its subsidiaries, such as:
 - 1) Joint investment or benefits with traders who conduct business with the Company or its customers
 - 2) Holding any position or even being a consultant to traders who conduct business with the Company or its customers
 - 3) Trading goods or providing services with the Company or its subsidiaries directly or through others
2. Directors and executives as defined by the Securities and Exchange Commission must disclose information on stakeholders of directors and executives or their related persons by completing the Conflict of Interest Disclosure Form (IA1-FM-02-02) and submitting it to the Company Secretary at least once a year by December 31 of each year and must report their interests every time the directors and executives become aware of the possibility that they or their related persons may have a conflict of interest with the Company.

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3. Directors, executives and persons responsible for reporting their interests must report to the Company. Acknowledge the interests of oneself or related persons in case such interests are interests related to the management of the Company and/or subsidiaries by filling out the Disclosure of Information on Interests of Directors and Executives (IA1-FM-02-04) and submit it to the Company Secretary immediately or within the specified time as follows:
 - 1) In case of first reporting: Report within the 15th day of the following month.
 - 2) When a new director or executive is appointed: Report within 7 business days from the date of appointment.
 - 3) In case of reporting when there is a change in information on interests: Report within 3 business days from the date of the change, specifying the number of changes.
4. In case an employee and a person in the employee's family participate in or become a shareholder in any business that may have conflicting interests with the Company's business, that employee must notify the Chief Executive Officer or Managing Director in writing.
5. Other related transactions that are not normal transactions shall be conducted in accordance with the criteria related to related transactions under the Securities Act and the Company's Related Transactions Policy.
6. Supervise and be responsible for the Company and its subsidiaries to have appropriate internal control systems, risk management systems, and anti-corruption systems. Effective and strict enough to ensure that the operations of the Company and its subsidiaries will comply with the Company's policies, regulations, laws and guidelines on good corporate governance of listed companies, including the relevant regulations and rules of the Capital Market Supervisory Board, the Securities and Exchange Commission and the Stock Exchange of Thailand.
7. The board of directors shall supervise the Company and its subsidiaries to comply with the Securities and Exchange Act and other relevant laws, and disclose information in accordance with the rules of the Stock Exchange of Thailand and other relevant agencies.
8. Establish a clear work system to demonstrate that the subsidiary has sufficient systems to disclose information on significant transactions in accordance with the specified criteria continuously and reliably, and provide channels for the directors and executives to obtain information on the subsidiary in order to monitor the operating results and financial status, transactions between the subsidiary and the directors and executives, and significant transactions of the subsidiary effectively. In addition, a mechanism must be established to examine such work systems in the subsidiary, allowing independent directors, audit committee members, and internal auditors of the Company to directly access information, and to report the results of the examination of such work systems to the directors, audit committee members, and executives to ensure that the subsidiary consistently complies with the established work systems.
9. Avoid holding shares, being a director, executive, or consultant in businesses that are in the same nature as the Company or its subsidiaries, or businesses that are competitors of the Company or its subsidiaries. Holding shares and being a director, executive, or consultant in other organizations can be done if holding shares or holding such positions does not conflict with the Company's interests. and performing duties in the company or its subsidiaries, and complying with the criteria specified in the Public Limited Companies Act B.E. 2535 (and its amendments) and the Securities Act
10. The Company Secretary shall perform the following:
 - 1) Submit the Conflict of Interest Disclosure Form (IA1-FM-02-02) for the directors and executives to consider and review annually using the same time frame as the annual performance evaluation of the directors or, in the

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case where the directors, executives and persons responsible for reporting shall notify the Company when an incident occurs, by confirming the accuracy of the information or notifying the change of information within 3 days after receiving the survey or from the date of the change of information.

- 2) Submit a copy of the report on conflicts of interest under Section 89/14 of the Securities Act to the Chairman and the Chairman of the Audit Committee within 7 business days from the date the Company receives the report.
- 3) Keep the report on conflicts of interest reported by the directors and executives to the Company.
- 4) Disclose information on conflicts of interest of the directors and executives in the annual information disclosure form/annual report (Form 56-1 One Report).

Measures for managing conflicts of interest

1. Provide knowledge to employees and executives at various levels, including disseminating the policy on managing conflicts of interest to the entire company.
2. When a director or employee intends to become a director or advisor in the company, organization or other business association, such position must not conflict with the benefits and direct duties of the company, and must notify the board of directors before assuming such position in other organizations.
3. The company will manage conflicts of interest effectively by encouraging officers to disclose conflicts of interest and provide assistance in resolving problems resulting from such conflicts of interest.
4. Executives or employees are prohibited from borrowing money from the company's business partners, individuals or juristic persons conducting business with the company, except for financial institutions, as this may influence the performance of duties in the company.
5. Arrange for the disclosure of the list of major shareholders of the company, and the company's executives and directors are required to report changes in their securities holdings to relevant agencies in accordance with the law, and the company secretary must report the results of the report with the board meeting.
6. The company must ensure that the system for preventing and managing conflicts of interest is regularly reviewed for efficiency, with data collected based on actual events so that the system for preventing and managing conflicts of interest can be enforced in the actual context, and the system must be reviewed and changed for continuous development.
7. In the event that an executive, employee or family member of such person has direct or indirect interests that conflict or may conflict with the interests of the company, The Company's executives or employees must notify their superiors or other authorized persons in advance, and such persons will not have the right or participate in decisions related to such benefits.
8. The Company must implement a policy that does not allow the Company's executives and employees who are shareholders or receive benefits from competitors or traders/sellers with whom the Company does business to participate in decisions related to business relationships with such businesses.
9. The Company has specified procedures for related party transactions and approval authority, including clear disclosure of information in accordance with the conditions in the SEC and Capital Market Commission announcements, and must disclose in the annual report and annual information form (Form 56-1).
10. Communicate to stakeholders, service recipients, supporters of the Company, and the community about its commitment to managing conflicts of interest.



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Policy Review

This Policy shall be reviewed at least annually or promptly in the event of any event that may affect the principles set out in this Policy, and such review shall be submitted to the Board of Directors for consideration and approval.

This Conflict of Interest Prevention Policy, has been approved by the Board of Directors' Meeting No.2/2026 on May 8, 2026, and be effective from June 1, 2026 onwards.

(Mr.Pawat Wongtangtrakul)

Chairman of the Board