




บริษัท แอปพลาย ดีบี จำกัด (มหาชน)

APPLIED DB PUBLIC COMPANY LIMITED



Anti-Corruption Policy



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Anti-Corruption Policy

Applied DB Public Company Limited and its subsidiaries, collectively referred to as the Company, have a policy of conducting business with transparency, honesty, integrity and accountability in order to comply with laws and regulations, including implementing the principles of good corporate governance, which the Company has established and adhered to. The Company therefore aims to promote all personnel in the Company to have a good sense of honesty and integrity in performing their duties.

The Company is aware of the damage caused by corruption, which not only affects the good reputation of the Company but also has a great impact on the Company's management system and especially good social practices. The Company has therefore established an anti-corruption and corruption policy. This anti-corruption and corruption policy ("Policy") is an additional part of the Company's Code of Ethics and has been approved by the Board of Directors.

1. Objective

- 1.1 To show the direction and framework of the Company's operations regarding corruption management, good practice principles, and prevention of corruption that are accepted as appropriate for adjustment to be consistent with the economic and social environment of the country.
- 1.2 To enhance knowledge, understanding and cooperation of directors, executives, employees and those involved in the anti-corruption policy to serve as a guideline and promote the Company to be an organization with good management, efficiency, ethics and business ethics.

2. Scope


This Policy applies to all levels of the Company and its subsidiaries' personnel, including directors, executives and employees of the Company.

3. Definition

- 3.1 **Corruption** means any action, whether it is offering, promising, soliciting, demanding, giving or accepting property or other benefits to government officials or any other person doing business with the Company, whether directly or indirectly, in order for such person to perform or refrain from performing duties in order to obtain or retain any other benefits that are not appropriate for business, except in cases where laws, regulations, rules, local customs or trade traditions permit such action.
- 3.2 **The Company** means Applied DB Public Company Limited and its subsidiaries, hereinafter collectively referred to in this document as the "Company".
- 3.3 **Company personnel** means the Company's directors, executives and employees of the Company or its subsidiaries.
- 3.4 **Subsidiary** means a subsidiary company according to the consolidated financial statements of the Company.

4. Anti-corruption Policy

All Directors, Executives and Employees of the company shall not commit or accept any form of corruption, both directly and indirectly, covering all businesses all department all section and relevant departments of the Company and subsidiaries and shall review compliance with the anti-corruption policy appropriately and


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consistently, as well as review the guidelines and operating requirements to be consistent with changes in business, regulations, rules and legal requirements, with the following guidelines:

- 4.1 Refrain from engaging in any behavior that indicates an intent of corruption or bribery, whether giving or receiving bribes from government officials, private entities, or stakeholders related to the Company, in order to obtain or maintain business or a competitive advantage, or for personal gain or the benefit of related parties.
- 4.2 Do not ignore or disregard any act that may constitute corruption involving the Company. It is a duty to report such incidents to a supervisor or responsible person and to cooperate fully in any investigation of the facts.
- 4.3 The Company will ensure fairness and protection for individuals who refuse to participate in corruption or who report suspected corruption in accordance with the Company's whistleblower protection measures.
- 4.4 The Company is committed to disseminating, educating, and promoting understanding among individuals whose responsibilities are related to or may affect the Company, to ensure compliance with the anti-corruption policy.
- 4.5 The Company has established appropriate and effective internal audit and control systems and processes to regularly prevent corruption.
- 4.6 The Company has implemented a human resource management process that reflects its commitment to anti-corruption measures, covering recruitment, training, performance evaluation, compensation, and promotion.
- 4.7 Any person found to have engaged in corrupt practices will be deemed to have violated the Company's Code of Conduct and will be subject to disciplinary action in accordance with the Company's employee regulations, and may also be subject to legal penalties if the act violates the law.
- 4.8 The Company will create and maintain an organizational culture that believes that corruption is unacceptable in any transaction with the government or private sector.

5. Responsibilities

- 5.1 **The Board of Directors** has a role, duty and responsibility in determining the policy, supervising, monitoring and allocating adequate and appropriate resources to ensure that the Company achieves the objectives of implementing the anti-corruption policy. The approver and supervise the preparation of a clear anti-corruption policy and guidelines, and communicate the policy to the Company's employees at all levels and external parties to ensure its actual implementation.
- 5.2 **The Audit Committee** has roles, duties and responsibilities in
 - Reviewing the Company's operations in accordance with anti-corruption measures, including financial reports, control systems and internal auditing to ensure that the operations of various departments are efficient, legal, and in line with good practices and ethical standards.
 - Review the accuracy of reference documents and self-assessment forms regarding the Company's anti-corruption measures in accordance with the Private Sector Collective Action Coalition Against Corruption (CAC) project as proposed by the internal audit unit or internal control unit.
- 5.3 **The Risk Management Committee** shall determine the risk management policy and risk management strategies that affect the anti-corruption policy, consider and screen the strategic asset allocation to be

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consistent with the Company's acceptable risk, and report the results of risk management to the Board of Directors.

5.4 Management by the Executive Committee, Chief Executive Officer, and Executives have roles and responsibilities to implement the anti-corruption policy, support resources, communicate and promote personnel at all levels and all relevant parties to have knowledge and understanding of the anti-corruption policy, practices and measures, and implement the opinions of the Board of Directors and the specific committees. Review the appropriateness of the systems and measures to be consistent with changes in business, regulations, rules and legal requirements. Report to the Board of Directors and/or the specific committees according to the roles, duties and responsibilities.

5.5 Internal Control Unit has the duty and responsibility to receive the policy from the Board of Directors to create the anti-corruption policy, provide advice and suggestions on anti-corruption, review the inspection and review of the compliance with the anti-corruption policy, communicate and/or train to provide knowledge on the fact-finding policy in case of complaints or whistleblowing to ensure that the Company has an appropriate internal control system for anti-corruption and report to the Audit Committee.

5.6 All personnel of the Company have duties and responsibilities to act in accordance with the Anti-Corruption Policy. In the event of any suspicion or violation of this policy, it must be reported to a supervisor or through the reporting channels in accordance with the procedures specified in the complaints regulations.

6. Anti-corruption practices

6.1 Implementation of this policy shall use the practices as specified by the Company in the Anti-Corruption Practices, Code of Ethics and Work Practices, including other related regulations and manuals.

6.2 In carrying out matters that are at high risk of corruption, the Company requires its personnel to perform the following duties with caution:

6.2.1 Political Contribution

The Company has a policy regarding political activities as follows:

- (1) The Company does not support the activities of any political party and will remain neutral, not aligning with any political party and not providing support to any particular political candidate. The Company does not provide assistance to any political candidate, whether directly or indirectly. This includes the use of Company resources in any activities that may compromise the Company's political neutrality and/or cause damage resulting from involvement in such activities.
- (2) The Company recognizes that employees have the right and duty, under a democratic system, to personally and freely participate in or support political activities, provided that such actions do not affect the Company
- (3) Employees who participate in political activities must not use Company assets in a manner that could create the misunderstanding that such activities are conducted on behalf of the Company.

6.2.2 Charitable contribution and Sponsorship

The Company has a policy to control charitable donations or financial support in various forms to ensure that such activities do not become a channel for corruption. There are clear and strict methods and controls, as well as the ability to review and track various documents and evidence as follows:



- (1) Donations of money or assets for charitable purposes, public benefit, or sponsorship must be conducted transparently, in compliance with the law, and in accordance with moral standards. They must not involve any actions that could negatively impact society at large.
- (2) Employees must exercise due care to ensure that charitable donations and sponsorships are not used as a means to conceal bribery. All such actions must be transparent and comply with applicable laws.
- (3) Donations of Company funds or assets to public organizations for social benefit may be made within the Company's authorized approval framework, provided that the recipient organizations are credible, certified, and subject to verification.
- (4) Sponsorships must be provided solely for the purpose of promoting the Company's business and public relations.
- (5) Caution must be taken to ensure that the use of Company funds or assets in support of projects under the Company's name is for legitimate business purposes and contributes to enhancing the Company's image and reputation.

6.2.3 Gifts, Hospitality, and Expense

The Company does not have a policy to give or receive gifts of any kind, including cash, with business partners, except in cases where the giving or receiving of gifts and entertainment is customary and socially acceptable. Such acts must be reasonable in value, not intended to influence or induce any action or omission that could lead to corruption or bribery issues, must not violate any laws or regulations, and must comply with the Company's Code of Conduct and policies.

6.2.4 Facilitation Payment

The Company has no policy of paying facilitation fees in any form, either directly or indirectly. We will not take any action and will not accept such action in exchange for facilitating business operations.

6.2.5 Revolving Door

The Company has no policy of hiring government officials to be directors or consultants, which may cause conflicts of interest and abuse of power.

7. Measures of implementation

- 7.1 The Company has internal control measures to prevent corruption in high-risk matters that lead to corruption. All directors and employees of the Company must perform their duties based on this policy and must not engage in corruption, whether directly or indirectly. If they encounter or learn of corruption, whether it is related to their duties or not, they must report it to their supervisor or the person in charge of taking responsibility for their conduct in accordance with this policy. However, if that person is corrupt themselves, they must report it to someone in a higher position.
- 7.2 The Company's personnel must avoid any action that has a conflict of interest with the Company. If any action is considered a conflict of interest with the Company in order to obtain or maintain business or competitive advantage, or for the benefit of themselves and related persons, the directors, executives and employees have a duty to report conflicts of interest through the methods and channels specified by the Company in the whistleblowing and complaints procedures.



- 7.3 The Company's personnel must not neglect or ignore any acts that may constitute corruption related to the Company. It is their duty to notify their supervisor or responsible person and cooperate in the investigation of the facts.
- 7.4 The Company shall provide fairness and protection to persons who deny corruption or report corruption clues to the Company as specified in the measures to protect complainants or those who cooperate in reporting corruption.
- 7.5 The Company realizes the importance of disseminating knowledge and providing understanding to persons who must perform duties related to the Company or may have an impact on the Company in matters that must be performed in accordance with this anti-corruption policy.
- 7.6 The Company shall provide appropriate and effective internal auditing processes and control systems on a regular basis to prevent corruption.


8. Human resource management

In order for human resource management to effectively support the anti-corruption policy and prevent all forms of corruption, the Company has the following requirements:

- 8.1 The Company has established a human resource management process that reflects the Company's commitment to the anti-corruption policy and measures by establishing an organizational structure that provides for an appropriate division of duties to create checks and balances, and by taking steps to ensure that there are sufficient and appropriately skilled human resources to implement this policy.
- 8.2 The management and the human resources and development executives must apply this policy to human resources management, starting from the recruitment or selection process. Employees who are selected for employment at the management level must conduct an in-depth investigation to determine their history of corruption. In addition, the company must consider the performance of the employees in terms of promotion, performance evaluation, and compensation in accordance with the policy and not have a history of disciplinary offenses or not being punished for corruption offenses or behavior that is contrary to the implementation of this policy.
- 8.3 Hiring any person to act on behalf of or on behalf of the Company, the person concerned must inform such person and comply with this policy and must supervise the terms of employment to be transparent, appropriate, legal and not corrupt.
- 8.4 The Company will provide knowledge and create awareness to create true understanding of anti-corruption measures. The Company arranges for orientation of new employees and has a training process to test knowledge of the policy for employees regularly at least once a year.
- 8.5 The management or the Human Resources and Development Department shall explain the penalties for violating this policy to the Company's employees.
- 8.6 The Company has a policy not to demote, punish or give negative consequences to any employee of the Company who refuses to commit corruption, even if such refusal causes the Company to lose business opportunities and has a clear communication process to inform employees.

9. Communication, reporting information to the public or stakeholders.

The Company has a policy to communicate various information related to anti-fraud and corruption measures to the Company's personnel, shareholders, customers, agents, business partners, all groups of

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stakeholders, and business related persons through both internal and external media, via the ADB Knowledge system, www.adb.co.th, and annual information forms/annual reports, etc., to promote the Company's reputation and good image in combating corruption. The Company has determined the working methods as follows:

9.1 The Company disseminates knowledge and understanding about this policy to partners and stakeholders to be aware of measures to prevent corruption through the following communication methods:

9.1.1 Directors

The Company will present information about the anti-corruption policy to all directors, including an orientation for new directors on important policies, including this anti-corruption policy.

9.1.2 Employees

1) New employees

All new employees will be briefed on key policies including the Anti-Corruption Policy on the day of employment contract signing and will be trained on essential knowledge of the job, key policies and employee code of conduct during new employee orientation.

2) Current Employees

- All employees will be informed and sign the anti-corruption policy and practices and can also study by themselves through the channels that the company has published in the intranet system and the company website. The company will inform employees if there is any change.
- All employees will receive annual refresher training or when there is a change in the anti-corruption policy to be aware of corruption, such as forms of corruption, risks of agencies that have the opportunity to work with the public or private sectors, as well as methods of reporting cases of seeing or suspecting corruption, etc.

3) Agents, business intermediaries, distributors, service providers and contractors.

The Company shall communicate its anti-corruption policy to its agents, business intermediaries, distributors, service providers and contractors from the outset of the business relationship and thereafter as appropriate, using the Supplier Code of Conduct. The Company encourages all of its business partners to adhere to anti-corruption.

9.2 The Company is open to suggestions on anti-corruption measures from partners and stakeholders.

10. Anti-Corruption risk assessment


The Company has conducted a corruption risk assessment, especially bribery of government officials, targeting all processes and all levels of employees who have the opportunity to be involved or contact government agencies, state enterprises or external individuals. The procedures are as follows:

10.1 Conduct continuous corruption risk assessment to reduce opportunities for corruption both inside and outside the Company by assessing the risk at least once a year or when there is a significant change in working methods or procedures.

10.2 Establish a risk management policy that complies with minimum risk management standards.

11. Whistle Blowing Policy

The Company provides opportunities for stakeholders to communicate with the Board of Directors and will protect the rights of appropriate stakeholders to those who are complained of with fairness and protect those who report corruption and fraud by specifying channels for reporting clues and complaints and measures to protect

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complainants or whistleblowers and fact-finding processes. See details in the Whistle Blowing Policy. The communication channels are through the Company's Audit Committee to proceed according to the process specified by the Company and report to the Board of Directors. The contact channels are as follows:

▪ **By mail**, send to:

Chairman of the Audit Committee
Applied DB Public Company Limited
No.252, Moo 4, Sukhumvit Road, Prakasa, Muang, Samutprakarn 10280

▪ **E-mail by** sending to adb-cg@adb.co.th

12. Internal control and reporting

12.1 The Company has an internal control system to ensure that the Company's operations are appropriate and efficient, including compliance with relevant laws and government regulations, and to reduce the risk of corruption, an internal audit system is in place to ensure reasonable assurance that the existing internal control system can help the Company achieve its goals.

12.2 The Company requires the Internal Audit and Supervision Department to prepare an audit plan at least once a year. The audit plan will be approved by the Audit Committee, which will consider the plan based on the risk of corruption.

12.3 The Company shall maintain an effective internal control system to combat corruption, covering checks and balances between accounting, data storage, and related business processes.

12.4 The Company has established procedures for reporting audit results and reporting urgent issues as follows:

- 1) The internal control unit shall report the audit results and issues found at least once a year to the Audit Committee on a quarterly basis and report in parallel to the Chief Executive Officer.
- 2) Internal Audit Unit, The Internal Control Unit discusses with the executives of the department, Managing Director and the Chairman of the Audit Committee to find appropriate internal control guidelines.
- 3) If any urgent issues are found, the Internal Control and Internal Audit Unit will immediately notify the Chairman of the Audit Committee.
- 4) The Audit Committee will report the audit results to the Board of Directors.

13. Monitoring and review

The Company will monitor and review the anti-corruption measures to be aware of the changing situation and risks regarding this policy.

13.1 The Audit Committee is responsible for reviewing anti-corruption measures and related internal controls.

13.2 The Risk Management Committee shall review the assessment of corruption risks and prepare a report to the Board of Directors at least once a year.

13.3 The management and/or subcommittees follow up and review the results of compliance with the anti-corruption policy and practices, report to the Board of Directors for consideration and approval of changes, and supervise and monitor the implementation of this policy and practices and provide advice continuously or at least once a year.



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14. Punishment

The Company has a process to appropriately punish its personnel who do not comply with the Anti-Corruption Policy. This punishment includes termination or dismissal in accordance with the Company's work regulations. In addition, legal penalties may be imposed if the action violates the provisions of the law.

This Anti-Corruption 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