



Anti-Corruption Policy Guideline of Global Green Chemicals Group Policy

1. Intent and Principles

Global Green Chemical Public Company Limited and its subsidiaries (the “Group”) are committed to conducting business responsibly, with integrity, fairness, and transparency. It prioritizes anti-corruption and anti-bribery efforts and aims to foster a culture of fraud and corruption prevention throughout the organization. The Group is dedicated to raising awareness of corruption in all forms at every level and ensuring that all directors, executives, employees and anyone acting on behalf of the Group understand their responsibility to comply with applicable laws, regulations, and ethical guidelines, and must not engage in, solicit, or accept any form of corruption or bribery, whether direct or indirect.

2. Objective

The Board of Directors has developed this policy as a key component of the Group’s Corporate Governance Policy. It establishes procedures for assessing risks, implementing internal controls, and ensuring the prevention, detection, investigation, and management of corruption and fraud. The policy also includes processes for monitoring and reporting the management of corruption risks. The aim is to ensure that all personnel, including directors, executives, employees, and contractors, as well as anyone acting on behalf of the Group, adhere to the principles outlined in this policy, and any violations will result in disciplinary actions as well as legal consequences.

3. Scope of Application

This Anti-Corruption Policy applies to directors, executives, and employees at all levels within the Group, as well as individuals associated with the Group.

4. Definitions

Corruption refers to any act intended to unlawfully obtain benefits for oneself or others. This includes the following actions:

1. Embezzlement refers to the unlawful appropriation of property or resources that belong to others, or that are owned by another party, and converting such property for personal use or the benefit of a third party. It also includes using the property for personal gain or activities that are unrelated to its original purpose.
2. Falsification of Accounts refers to the manipulation of financial figures and/or other information by exploiting gaps in accounting principles and various options for measurement and disclosure. This is done to alter financial statements in a way that meets specific objectives. It also includes the intentional disclosure of false information and/or failure to disclose necessary information for improper purposes within financial reports.

Falsifying accounts further extends to non-financial disclosures, such as manipulating and/or distorting data or qualitative details about the organization to create a misleading image. This can include reports on environmental, social, and governance (ESG) performance, employee qualifications, compliance, organizational management, research or customer satisfaction surveys, as well as withholding crucial information that should be disclosed to investors and regulatory authorities. This undermines the organization's credibility, impacts transparency in operations, and leads to misunderstandings among stakeholders, such as investors, regulators or business partners.

3. Corruption refers to any act to offering, promising, requesting, demanding, giving or receiving property or any other benefits to or from a government official or any other individual doing business with the Company-either directly or indirectly-in exchange for the person performing or refraining from

Giving or Receiving of Gifts refer to the giving or receiving of money, items, compensation or any other form of benefit.

Hospitality and Entertainment refer to expenses related to business hospitality, such as meals and drinks, sports events, and other costs directly associated with business activities or established trade practices. This can also include the provision of business knowledge or insights.

Donation and Sponsorship refer to the provision of financial support, products, services, or other assistance to recipients or organizations for charitable purposes or to promote the Group's business and enhance its public image.

Political Contributions refer to the provision of assets, money, goods, rights or other benefits to assist, support or serve the interests of political parties, politicians, or individuals with political duties, as well as any political activities, either directly or indirectly.

Conflict of Interest refers to any situation where an individual has a personal interest or conflict with the Group's interests, whether arising from dealings with the Group's business partners or from exploiting opportunities or information gained through employment for personal gain, engaging in competing business activities, or taking on other work outside of the Group's interests, thereby affecting the performance of their duties.

Facilitation Payments refer to small payments made to government officials informally, aimed solely at ensuring the official performs or accelerates a specific task that falls within their official duties, without requiring their discretion, and are within their lawful duties. This may also include payments for rights the Company is already entitled to by law, such as requesting permits, certifications, or receiving public services.

Government Employee refer to individuals holding political office, civil servants, or local government employees with permanent positions or regular salaries, This also includes employees or individuals working in state-owned enterprises or government agencies, local government executives, and local council members who are not political officeholders. Additionally, it encompasses officials as defined under local governance laws, as well as directors, subcommittee members, and employees of government agencies, state-owned enterprises, or government entities. This term also includes individuals or groups who are empowered or authorized to exercise governmental powers in accordance with the law, whether within the civil service, state-owned enterprises, or other state-run operations.

Related Persons refers to the spouse, children, parents, siblings and close relatives of directors, executives, and employees at all levels within the Company and its subsidiaries.

The Company refers to Global Green Chemical Public Company Limited.

The Global Green Chemical Group refers to Global Green Chemical Public Company Limited and its subsidiaries.

Personnel of the Group refers to directors, executives, and employees at all levels within the Global Green Chemical Group.

Related Parties refers to contractors, agents, consultants, or any individuals acting on behalf of the Group, regardless of whether they have formal authority to do so. It also includes affiliated companies, joint ventures, and companies controlled by the Company. The control is defined according to the definitions and meanings set forth by the Company in the Corporate Governance and Business Code of Conduct Handbook.

5. Roles, Duties, and Responsibilities

The Company defines the roles, duties, and responsibilities regarding anti-corruption efforts for personnel at all levels as follows:

5.1 Board of Directors

The Board is responsible for establishing and approving Anti-Corruption Policies, ensuring the implementation of an effective system for managing corruption and fraud risks, monitoring adherence to these policies, and leading by example in their application.

5.2 Corporate Governance and Sustainable Development Committee

The Corporate Governance and Sustainable Development Committee recommends, reviews, and refines the policies and practices related to business ethics and code of conduct, as well as the anti-corruption policy, in line with the principles of good corporate governance, to the Board of Directors. Additionally, it oversees and manages the implementation of sustainable development initiatives.

5.3 Audit Committee

The Audit Committee plays a key role in overseeing corporate governance by monitoring financial reporting, internal controls, internal audits, and compliance with applicable laws. It also reviews the Company's self-assessment on anti-corruption measures and ensures management is effectively handling whistleblowing and complaints.

5.4 Corporate Affairs and Company Secretary Department

This department is responsible for drafting, reviewing, and updating the Company's Anti-Corruption Policies in response to changes in relevant laws, regulations, and guidelines. It also monitors and evaluates ongoing compliance with these policies and communicates and promotes awareness of the Company's commitment to combating corruption among internal and external stakeholders.

5.5 Corporate Governance, Compliance and Corporate Secretary

This department is responsible for receiving whistleblower reports and complaints related to fraud and corruption, logging the information in the complaint registry, coordinating with relevant departments to investigate the facts, and compiling a summary of the findings. This summary will then be reported to the Corporate Governance and Sustainable Development Committee, as well as the Audit Committee, for their review and consideration, along with any necessary recommendations.

5.6 Anti-Corruption Task Force

The task force is responsible for overseeing and ensuring the implementation of policies, measures, internal controls, and practices related to anti-corruption. This includes reviewing and providing recommendations for assessing corruption risks, identifying activities or transactions that require extra caution, and reporting the outcomes to the management team. The task force will then present its findings to the Corporate Governance and Sustainability Development Committee annually.

5.7 Executives

Executives are responsible for implementing the anti-corruption policies, as well as communicating and promoting awareness of these policies to all employees and relevant stakeholders. They are tasked with assessing corruption risks in operational processes and reviewing and evaluating the effectiveness of measures in place to combat corruption. Executives must report the results of these assessments to the relevant committees.

6. Corruption Risk Assessment

The Company is committed to identifying and assessing corruption risks across all processes throughout the organization, at both the business group level and within individual operational procedures. Proper management strategies are implemented, and the effectiveness of these strategies is evaluated regularly, at least once a year.

7. Anti-Corruption Practices and Measures

- 7.1 The Company has established an Anti-Corruption Task Force to oversee and ensure the effective implementation of anti-corruption measures. This initiative aligns with the Company's commitment to becoming a member of the Thai Private Sector Collective Action Against Corruption (CAC).
- 7.2 The implementation of this policy will follow the best practices outlined in the Company's Corporate Governance and Business Code of Conduct Handbook, as well as the applicable regulations, policies, rules, and guidelines set by the Company. Personnel at all levels within the Group must carry out their duties with transparency, avoiding any actions that could suggest intent to engage in corruption. They must not be involved in any form of corruption, whether directly or indirectly.
- 7.3 All personnel at every level within the Group are prohibited from offering or accepting bribes, kickbacks, or any other form of compensation or benefits that resemble bribery, whether directly or indirectly, to or from public officials or private sector individuals. This prohibition ensures that no one attempts to influence decisions or unlawfully gain benefits.
- 7.4 All personnel must exercise caution when giving or receiving gifts, presents, hospitality, or other related expenses. These actions must comply with the best practices outlined in the Corporate Governance and Business Code of Conduct Handbook and follow the Company's Anti-Corruption Policy regarding receiving and offering of gifts, hospitality, and other benefits (No Gift Policy).
- 7.5 Charitable donations and sponsorships must be made in the name of the Company and must serve the purpose of benefiting society or promoting the business and the positive image of the Group. These actions must be carried out transparently and should not serve as a conduit for corruption. They must adhere to the procedures specified in the Company's Donation and Sponsorship Procedure, which ensure proper public representation of the Company and its subsidiaries.

- 7.6 The Company maintains political neutrality and does not support or provide financial resources, assets, or any other form of assistance, whether directly or indirectly, to politicians, political parties, or any political groups. While personnel are free to exercise their political rights, they must refrain from using the Company's resources or engaging in any political activities that could compromise the Group's political neutrality or cause reputational damage.
- 7.7 All personnel must avoid actions that create conflicts of interest with the Company. Any actions must be justified, reasonable, and aligned with the Company's best interests, while complying with the law and applicable regulations. If any situation arises that may lead to a conflict of interest with the Group, the involved individual must promptly report it using the procedures and channels designated by the Company.
- 7.8 The Company strictly prohibits the payment of facilitation fees in any form, whether directly or indirectly. The Company will not engage in, nor accept, any actions that involve paying facilitation fees to expedite business processes.
- 7.9 The Company has established clear and appropriate criteria for hiring public sector employees to prevent such actions from being used to gain any improper benefits. Additionally, the Company has measures in place to disclose information regarding the hiring of public sector employees to the public for transparency.
- 7.10 Business relationships and procurement with both the public and private sectors, including interactions with government officials or private entities, as well as individuals involved in the Company's operations and those of its affiliates, whether domestically or internationally, must be conducted with transparency, integrity, and in full compliance with all applicable laws.
- 7.11 When hiring any individual to act on behalf of the Company or its Group's personnel, the relevant parties must ensure that the individual is informed of the Company's business code of conduct, particularly with regard to Anti-Corruption Policies. Furthermore, it is essential to ensure that the terms of such employment are transparent, appropriate, legal, and free from fraud and corruption.

- 7.12 The Company has a process in place for regularly reviewing, auditing, and improving its anti-corruption measures. It also reports annually to the Corporate Governance and Sustainable Development Committee to assess the effectiveness of these measures, make necessary improvements, and ensure they remain aligned with evolving risks related to corruption.
- 7.13 The Company has implemented risk mitigation measures across operational control, environmental control, financial control, and document management.
- 7.14 The Company has a process for reviewing internal control systems related to the procedures for financial reporting, accounting processes, data disclosure, and data retention. This includes reporting the results of internal control assessments and a procedure for reporting any issues identified during internal audits to Top-Executives and the Board of Directors.
- 7.15 The Company has established policies and procedures for human resource management, including the recruitment or selection of personnel within the Group, performance evaluations, compensation, and promotions. These processes reflect the Company's commitment to combating corruption.
- 7.16 The Company will not demote, penalize, or otherwise take negative actions against any employee within the Group for refusing to engage in corrupt or fraudulent activities, even if such activities results in the Company losing business opportunities. A clear communication process is in place to ensure employees are fully aware of this policy.
- 7.17 The Company provides ongoing training on anti-corruption measures and related knowledge to all employees within the Group.
- 7.18 The Company communicates its Anti-Corruption Policies to subsidiaries, affiliates, entities under its control, customers, business partners, collaborators, agents, consultants, stakeholders, and external parties acting on behalf of the Company, and/or individuals associated to the Group, as well as the general public. This communication occurs through various channels to ensure that all parties are informed and able to implement the Company's anti-corruption measures.

8. Reporting Complaints and Investigations

- 8.1 The Company has established a Whistleblower Policy that specifies the procedures and channels for receiving complaints, the steps for investigating the facts, and the determination of penalties. Employees of the Group must not ignore or disregard any activities that may involve corruption or fraudulent conduct related to the Company. It is their duty to report such activities to their supervisors or the responsible person, or to submit tips through Whistleblower channels. They are also required to cooperate fully in the investigation of the facts.
- 8.2 The Company is committed to ensuring fairness and protection for employees or any individuals who report tips or provide evidence regarding corruption or fraudulent activities involving the Company or its subsidiaries. This protection extends to employees who refuse to engage in corrupt or fraudulent conduct. The Company will implement the highest level of confidentiality for the information provided by the whistleblower, as well as for those who cooperate in reporting fraud or corruption, in accordance with the Whistleblower Policy.

9. Penalties

- 9.1 The Company has established penalties for directors, executives, and employees who fail to comply with the anti-corruption measures. These penalties may include removal from position for directors or disciplinary actions in accordance with applicable regulations for executives and employees. Additionally, legal actions may be taken, along with adherence to relevant laws, regulations, and good governance practices related to the misconduct.
- 9.2 If any parties associated with the Company, including customers, business partners, or collaborators, fail to comply with the anti-corruption measures, the Group may consider terminating any business transactions with such parties.

10. Review and Improvement of the Policy

The Company regularly reviews and updates this policy at least annually or whenever significant changes occur to ensure it remains in compliance with changes in laws, regulations, and relevant requirements. Any revisions are then submitted to the Board of Directors for approval.

Effective from 10 April, 2025

- Narongsak Jivakanun -
(Mr. Narongsak Jivakanun)
Chairman of the Board