

Anti-Corruption Policy

Nawarat Patanakarn Public Company Limited places great importance on anti-corruption. The Company is committed to supporting and promoting awareness of anti-corruption across all levels of the organization. In this regard, the anti-fraud and anti-corruption has been established, which will be a standard guideline for to all directors, executives, employees.

Section 1: Definitions

“Company” refers to Nawarat Patanakarn Public Company Limited and its subsidiaries.

“Subsidiaries” refer to Mana Patanakarn Company Limited, Advance Prefab Company Limited, Myanmar NWR Company Limited, Utility Business Alliance Co., Ltd., Nawarat (Cambodia) Company Limited, Tastemaker Company Limited, Nawarat Advance Prefab Myanmar Company Limited, including any company in which the Company holds more than 50% of the registered capital after this policy has taken effect.

“Corruption” refers to offering to or receiving bribes from government officials, government agencies, private entities, or any other individuals doing business with the Company, in order to induce such persons to perform or omit any act in their official capacity, or to misuse their authority in any forms. This includes seeking unlawful business benefits for oneself or others, whether inside or outside the organization.

Section 2: Related Persons

Directors, executives, and employees at all levels of the Company are strictly prohibited from engaging in any form of corruption, whether directly or indirectly. This applies to domestic and international business activities, as well as all related entities, intending to ensure that the Company is entirely free from involvement in corrupt practices.

Section 3: Roles and Responsibilities

1. Board of Directors

Responsible for approving the anti-corruption policy, as well as ensuring that effective systems to support anti-corruption efforts are available. The goal is to ensure that executives, management, employees, and all related parties understand and adapt anti-corruption practices as part of the organizational culture.

2. Business Ethics Committee

Responsible for setting, reviewing, and improving the anti-fraud and anti-corruption policy to ensure it is effective, appropriate, and aligned with current circumstances.

3. Audit Committee

Responsible for overseeing the adequacy of internal control systems and ensuring operations are in line with the anti-corruption policy.

4. Executives and Management

Responsible for establishing, promoting, supporting, and controlling systems to ensure employees and related parties comply with anti-corruption policy. Executives and management are also in charge of reviewing the suitability of relevant systems and guidelines to actively align with the changes in business, rules, regulations, and legal requirements.

5. Internal Audit Department

Responsible for auditing and reviewing operations to ensure their compliance with policies, guidelines, procedures, and related laws, as well as ensuring that internal control systems are suitable and sufficient for combating fraud and corruption. The outcomes of such audits and reviews shall be reported to the Audit Committee.

6. Directors, Executives, and Employees

Must comply with the anti-corruption policy and must not engage in any form of corruption, whether directly or indirectly.

7. Joint Ventures, Associates, and Business Representatives

Must accept and adhere to the Company's anti-corruption policy.

Section 4: Scope and Guidelines

1. All directors, executives, employees, and relevant parties must strictly follow the anti-corruption policy and business code of conduct, without directly or indirectly engaging in any form of corruption.
2. The Company will promote and cultivate a sense of responsibility toward anti-corruption at all levels, along with implementing internal controls to prevent all forms of bribery and corruption, in any country where the Company conducts business.
3. The Company strives to foster and maintain a culture with zero tolerance against corruption in transactions, whether in dealing with the public or private sectors.
4. Directors, executives, and employees at all levels must not ignore or disregard suspected corruption and must report such incidents to their supervisors, an independent director, or the Audit Committee, and give full cooperation in the fact-finding investigation. The Company shall also provide channels to receive complaints from external parties. All of the above shall be in accordance with the regulations prescribed by the Company.
5. The Company shall ensure fairness and protect the Company's personnel who refuse to engage in corruption or report misconduct cases. No disciplinary or negative action will be taken against them—even if the refusal results in the loss of business opportunities of the Company. Furthermore, the Company shall ensure fairness and provide protection to employees or any other individuals who report tips or evidence of fraud or corruption related to the Company and its group companies, by applying the protection measures for whistleblowers or those who cooperate in reporting fraud and corruption, as set forth in the Whistleblowing Policy.
6. Directors and executives must act with integrity and behave as role models who adhere to the anti-corruption policy. The administrative team is responsible for educating and reinforcing the anti-corruption policy throughout the organization, cultivating it as part of the organizational culture.

7. Any act of corruption will be treated as a disciplinary violation per internal HR policy and may also result in legal penalties, depending on the nature of the offense.
8. Any implementation of the anti-corruption policy must follow the “Good Corporate Governance Policy,” “Business Code of Conduct,” relevant company regulations, and future operational guidelines.
9. The Company will regularly review its practices and operational guidelines to keep up with the changes in laws and business environments.
10. The anti-corruption policy will be communicated through accessible channels such as internal newsletters, the Company’s website, social media, and the annual report.

Section 5: Rules and Prohibitions

1. Recruitment and Promotion

This policy applies to the entire recruitment process, promotion, training, and performance evaluation. These processes must be transparent and fair. Supervisors at all levels shall comply with the Company’s rules and communicate them clearly to ensure business activities align with the policy.

2. Offering or Accepting Gifts, Other Benefits, and Entertainment

Gifts or benefits, including meals and entertainment offered to the Company’s stakeholders, shall be conducted in an appropriate, reasonable manner during festivals or traditional occasions, and in alignment with the business objective to maintain business relationships.

Directors, executives, and employees may accept gifts or benefits, including meals, from parties related to the Company’s business in accordance with customary traditions or festivals or traditional occasions, provided that such acceptance does not violate any applicable law. Gifts that may be accepted shall not exceed 3,000 Thai Baht and should preferably not be in cash or cash equivalents.

Examples of gifts that may be accepted include:

1. Items with a value not exceeding 3,000 Thai Baht and are not cash or cash equivalents.
2. Promotional items bearing the company's logo, such as pens, caps, T-shirts, notebooks, etc.
3. Items intended for general distribution, such as giveaways to employees or other customers of the business partner.
4. Items created or purchased to be distributed or given during festive occasions by a business partner, such as calendars, organizers, gift baskets, etc.
5. Other benefits and special privileges that may be provided by a business partner for promotional purposes

If directors, executives, or employees receive a gift exceeding 3,000 Thai Bath or frequently receive gifts from related business partners, the receiver must report it to their supervisor. In cases where the value exceeds the limit, the giver must be informed that it violates the Company's regulations, and the given item must be returned. In cases where a return is impossible, the product must be handed over to the line supervisor for further action.

Directors, executives, and employees are not allowed to request or accept any gifts or benefits that are inappropriate or beyond customary limits.

3. Political Contributions

The Company maintains neutrality on the political aspect and will not support any political party, group, or politician, whether directly or indirectly, and will not engage in any action that favors any particular political party.

While directors, executives, and employees may engage in political activities as private citizens, they must not use the Company's name, resources, or image in such activities, and must avoid any impression that the Company supports a particular political group.

4. Charitable Donations, Public Benefit, and Sponsorships

As part of giving back to society, the Company has a policy to support charitable donations, public benefit contributions, and sponsorship in the form of financial support or any other form,

such as donating goods or participating in activities. The charitable, public benefit, and sponsorship by the Company shall be as follows:

- 4.1 Transparent, lawful, and ethical without expecting business gain, and must not cause harm to society.
- 4.2 Giving or raising charitable donations, public benefit, or sponsorship must not be used as an excuse for bribery.
- 4.3 Use of the Company's money or assets for donations must be done solely in the Company's name and must aim to enhance a positive image and reputation for the Company.
- 4.4 Follow the procedures for reviewing and approving charitable donations, public benefit, or sponsorship according to the Company's regulations.

5. Facilitation Payments

'Facilitation payments' means small and unofficial payments paid informally to government officials solely to ensure that they carry out routine procedures or to expedite such procedures. These procedures do not require the exercise of the official's discretion and are action that the official is already obligated to perform in the course of their duties. Such payments related to the rights that a legal entity is already entitled to under the law, for example, applying for a license, requesting a certificate, or receiving public services.

6. Employment of Government Officials

Employment of government officials refers to individuals from the public sector who work or hold various roles in the private sector, which may create conflicts of interest or affect decision-making, leading to a lack of trust and a risk of corruption.

A government official means a person who has the authority or duty to work for the state or state agencies, such as civil servants, government employees, public organization staff, state enterprise employees, and political office holders who hold a position or receive a regular salary that might result in mutual benefits.

To establish clear guidelines, the employment of government officials who join the Company as directors or advisors must follow a selection process, obtain hiring approval, determine appropriate compensation, and implement control procedures. This ensures that

such employment does not confer any undue benefit or advantage to the Company, protects the Company's reputation for integrity and honesty, and mitigates the risk of corruption.

The Company shall not hire government officials if such employment would provide any undue benefits or advantage to the Company, or result in any form of reciprocal gain.

The Human Resources Department is responsible for strictly reviewing the employment of government officials according to this policy. All hiring must be reported and approved beforehand. Advisory positions must be approved by the CEO or Managing Director, and director positions must be approved by the Company's Board of Directors or by shareholder meeting (as applicable).

Any directors, executives, or employees who violate, neglect, omit, or intentionally fail to comply with this policy or act in ways associated with corruption will be subject to disciplinary action as determined by the Company. Legal penalties may also apply if actions violate the law. Claiming ignorance of this policy or of the related laws shall not be accepted as a valid excuse for non-compliance.

This anti-corruption policy is the 2nd revision and was approved by the Company's Board of Directors at its Meeting No. 8/2568 on August 14, 2025.

It shall be effective from September 1, 2025, onwards

Mr. Prasertphand Pipatanakul
Chairman