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(For translation only)

PL-CG-003

## DTGO Anti-Corruption Policy

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DTGO has stipulated an anti-corruption policy that covers all forms of corruption, whether direct or indirect, and every country associated with DTGO's business operations and societal activities. DTGO promotes and encourages all FAMZ to value and be aware of anti-corruption practices. Moreover, DTGO places emphasis on conducting a regular review of the practice guidelines and requirements for implementing anti-corruption policy to conform with changes in the business and in rules, regulations, and related laws.

In accordance with its current organizational structure, DTGO deems it appropriate to **cancel** its DTGO Anti-Corruption Policy under DTGO-CG 002/2565 on 1 July 2022 and to establish the following new guidelines.

### 1. Definitions

- 1) **DTGO** means DTGO Corporation Limited and its subsidiaries, as well as any juristic persons under the administration and control of the Board of Directors and/or the management of DTGO (hereinafter referred to as "the organization").
- 2) **FAMZ** means anyone contracted to DTGO, whether in regular or fixed-period employment or as a consultant
- 3) **Root Captain of Business Group** means Root Captain - Property Business & Finance  
Root Captain - Corporate Strategy & Innovative Business  
Root Captain - Culture & Corporate Management
- 4) **Corruption** means any type of bribery, whether in the form of offering, giving, promising or agreeing to give, demand, or accept money, assets, or other illegitimate benefits from government officers, government agencies, private employees, non-governmental organizations or any individuals, whether directly or indirectly, to induce favorable actions or to restrain such individual or entity from performing their duties in order to acquire or retain business or to obtain illegitimate benefits. Exceptions shall be applied in the cases permitted by law, rules, notifications, regulations, and local customs.



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## 2. Roles and Responsibilities

- 1) **The DTGO Group Executive Committee** shall be responsible for approving the anti-corruption policy and practice guidelines, as well as for supervising and providing an effective system for supporting anti-corruption practices, with the ultimate goal of ensuring that the Management Team recognizes the importance of anti-corruption policy and effectively adopts the policy as a part of the organizational culture.
- 2) **The Good Corporate Governance Committee** shall be responsible for stipulating and reviewing the anti-corruption policy and practice guidelines at least once a year.
- 3) **The Audit Committee** shall undertake the responsibility of auditing to ensure that DTGO has an adequate and appropriate system for internal control, following auditing practices in accordance with the anti-corruption policy.
- 4) **The Internal Audit Department** shall be responsible for reviewing and auditing relevant measures' conformity with policy, regulations, and related laws, ensuring that the internal control system is sufficient and appropriate for potential risks of corruption. In addition, the results of such review and audit shall be reported to the Audit Committee for further examination.
- 5) **The Risk Management Committee** shall be responsible for monitoring and supporting the implementation of risk management practices by assessing corruption risks and reviewing the adequacy and appropriateness of anti-corruption measures.
- 6) **Root Captains of Business Groups and executives** shall be responsible for establishing a system in support of the anti-corruption policy and communicating with all FAMZ and related parties to ensure that they have a solid understanding of the policy and are able to implement it with efficiency and efficacy. In addition, the Business Group Chairman and executives shall review how anti-corruption practice guidelines conform to changes in the business and rules, regulations, and legal requirements.
- 7) **All FAMZ** shall be responsible for understanding and complying with the anti-corruption policy and practice guidelines. In the case of any breach or violation of the policy or suspicious event, FAMZ shall notify or report the corresponding person of such incident through whistleblowing channel in accordance with stipulated regulation.



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### 3. Guidelines for Practice

- 1) All FAMZ shall comply with the anti-corruption policy and the practice guidelines that have been stipulated according to the principles of good corporate governance and business ethics. No FAMZ shall be involved or engage in any activities pertaining to corruption, whether directly or indirectly, for the benefits of themselves, the organization, or other parties including government officers, government agencies, private employees, non-governmental organizations, and any individuals. Moreover, FAMZ shall comply with the related anti-corruption laws of Thailand and other countries associated with DTGO's business operations and social activities.
- 2) DTGO shall provide continuous training for all FAMZ, ensuring that they have a sufficient understanding of the anti-corruption policy.
- 3) DTGO shall establish an internal control system that encompasses finance, accounting, data storage, and all other processes relating to anti-corruption measures.
- 4) DTGO shall have a clear grant of authority that is concise, efficient, transparent, and auditable.
- 5) DTGO shall review the internal process to monitor the efficiency and efficacy of the process that has been designed.
- 6) A person who commits a corrupt act shall be deemed as violating the code of conduct or employment regulations and shall be subject to the stipulated disciplinary action as well as possible legal punishment if the act violates the law.
- 7) No FAMZ shall ignore or disregard any actions that could pertain to corruption. In this case, FAMZ shall report the person involved through a specified channel and shall collaborate in the investigation or examination of facts and other evidence.
- 8) DTGO shall provide fairness and protection to any FAMZ who rejects or reports corruption-related matters, whereby such person shall not be subject to demotion, penalties, or any negative consequences even if the action causes DTGO to lose business opportunities. DTGO shall protect the whistleblower, complainant, or collaborator who reports an act of corruption, according to the provision specified in the Whistleblowing or Complaints Regulations.
- 9) The anti-corruption policy shall cover human resource management processes, including recruitment, selection, promotion, training, performance evaluation, and compensation, whereby all levels of supervisors shall communicate with FAMZ under their responsibilities.
- 10) Any implementation or practice of the anti-corruption policy shall conform to the guidelines stipulated in DTGO's policies, regulations, and code of conduct pertaining to anti-corruption measures be effective now or to be stipulated later.



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11) For clarity in situations that have a high risk or potential for corruption, the directors, executives, and all FAMZ shall take care in the following matters:

**11.1) Giving or accepting gifts, entertainment, or other benefits**

Giving or accepting gifts, entertainment, or other benefits shall be in accordance with regulations stipulated by DTGO.

**11.2) Charitable donations or assistance**

- DTGO provides charitable donations, in both monetary and non-monetary forms (such as knowledge and time), as a part of activities for contributing to society and the community.
- Providing support or sponsorship is a form of DTGO's public relations, differing from charitable donations. Support or sponsorship can be conducted in various forms, such as supporting cultural activities, arts, and education.
- All FAMZ shall be cautious and ensure that charitable donations and sponsorship are transparent and legitimate.

**11.3) Business relations and procurement**

Offering or accepting a bribe is prohibited in all business transactions. The operations of DTGO shall be transparent and in accordance with related laws and regulations.

In effective from 1 April 2023.

Announced on 31 March 2023.