

Anti-Corruption Policy and Related Practice Thai Plaspac Public Company (Limited) and the subsidiaries

Thai Plaspac Public Company (Limited) and the subsidiaries (the “Company”) is committed to conducting business honestly, transparently and with fairness. by adhering to social responsibility and all groups of stakeholders according to good corporate governance principles and the company's code of conduct as well as policies and guidelines for various groups of stakeholders. In 2023, the Company has declared its intention to join “Thai Private Sector Collective Action Against Corruption: CAC” This shows the determination to be an organization that operates business without corruption.

to be a clear practical guideline for conducting business and up to date, the company has therefore reviewed This “Anti-Corruption Policy” is to ensure that the Company has policies in place to determine responsibilities, guidelines, and requirements for proper conduct. Prevent fraud and corruption that may occur in the business. and so that business decisions that may have risks of corruption have been carefully considered and properly implemented. The Board of Directors' Meeting No. 4/2023 therefore reviewed “Anti-Corruption Policy” to be more appropriate.

Definition

Corruption means a behavior in which one performs or refuses to perform the assigned duties or misuses ones position or power to dishonestly or unlawfully seek any types of personal interests such as bribery, embezzlement, extortion, demanding or accepting money, assets or other inappropriate benefits from government officers, government sectors, private sectors or any other related parties so that such person could proceed or disregard his/her function in order to acquire the business or achieve any improper benefits in business transactions with the exception of the cases in which it is permitted by law, regulation, statement, standard, custom or business tradition.

Giving or accepting a gift means giving or receiving any item, service, or benefit of monetary value.

Entertainment means spending on business entertainment. Whether it's food, drink, entertainment in the form of sports. or any service that occurred on traditional occasions to outsiders who join the business or contact the company.

Sponsorship means sponsoring an event or organization which may hope for the desired results of giving something. and may be related to commercial interests.

Donation means giving for the purpose of charity or assistance. This may be done in the form of donations of cash, services, new or used products.

Political contributions mean giving support in a form of money, items and/or participate in certain activities, including encouraging the employees to be involved in political activities on behalf of the Company in order to acquire business advantages.

Conflict of interest means a conflict between public interest and personal interest. This may affect the decisions or performance of the employees. and may have an impact on the interests of the company.

Thai Plaspac Public Company Limited

77 Soi Thian Thaley 30, Bang Khun Thian–Chay Thaley Road, Tha Kham, Bang Khun Thian, Bangkok 10150, Thailand

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Facilitating payments refer to small, informal payments to government officials and are made solely to ensure that Government officials will follow up with the process, or as an incentive to speed it up. The process does not require the discretion of government officials. And it is an act of duty of that state official. Including the right that the juristic person should have under the law already.

Revolving Door means hiring or recruiting government officials or government employees. to work in the organization

Anti-Corruption Policy and Related Practice

The Company shall not tolerate any forms of corruption and shall be applicable to all businesses and transactions in every country worldwide and every relevant function. The Board of Directors, the Management and employees of Thai Plaspac Public Company Limited including subsidiaries must strictly comply with the defined Anti-Corruption Policy and are prohibited from being involved with any forms of corruption either directly or indirectly.

Directors, executives, and employees of the Company are prohibited from doing anything that is related to corruption in all forms for direct or indirect benefits to themselves, their family, friends and acquaintances, regardless of whether they are in the capacity of recipients. A person who gives or offers a bribe, whether monetary or non-monetary, to a government or private agency with which the company conducts business or contacts. It will strictly comply with the anti-fraud policy.

Roles and Responsibilities

1. Board of Directors responsible for considering and approving policies and supporting fraud prevention in the company. So that everyone in the company understands and realizes the importance of problems arising from corruption. both in the case that the Audit Committee has reported fraudulent acts that affect the Company, the Board of Directors of the Company is responsible for giving advice, suggestions, consideration of punishment and jointly finding a solution to the managing director.
2. The Audit Committee has the following duties and responsibilities:
 - 1) Consider the anti-corruption policy received from the Managing Director to be suitable with the business model, environment of the company, corporate culture and propose to the Board of Directors for approval.
 - 2) Review the appropriateness of changes in the anti-corruption policy received from the Managing Director, Company Secretary. and presented to the Board of Directors for approval.
 - 3) Review the audit report of the internal control system and assess the risk of fraud. as proposed by the Internal Audit Department To ensure that such a system is vulnerable to opportunities. Corruption that has minimal impact on the Company's financial position and performance and is appropriate to the Company's business model.
 - 4) Receive whistleblowing reports of fraudulent acts that people in the organization are involved in and examine the facts as informed and propose the matter to the Board of Directors jointly to consider punishing or solving the problem.

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3. The Internal Audit Department has the following duties and responsibilities:
 - 1) Perform duties in accordance with the specified internal audit plan and submit audit reports on internal control systems and assessment of fraud risks arising from internal control audits to the Audit Committee. be informed.
 - 2) Perform duties as assigned by the Audit Committee in investigating fraud related to organization in addition to the internal audit plan that has been set.
4. The Managing Director has duties and responsibilities as follows:
 - 1) Determine the anti-corruption policy to be presented to the Audit Committee.
 - 2) Communicate with personnel in the organization and those involved to know the anti-fraud policy.
 - 3) Review the appropriateness of the anti-fraud policy to suit changes in business or legal requirements to present to the audit committee.
 - 4) Assist the Audit Committee in investigating facts as informed or assigned by the Audit Committee regarding fraud investigations. work for the management team that can help ascertain the facts.

Anti-Corruption Guidelines

Directors, executives, employees, and stakeholders of the company must strictly comply with the anti-corruption policy and business ethics. The company does not accept any form of corruption both directly and indirectly by

1. No staff shall behave in a way which demonstrates clear intention of committing an act of corruption, bribery, embezzlement and extortion or any form of corruption from government or private sectors or relevant stakeholders to acquire or maintain the business or competitive advantages or for personal interests or interests of any related parties.
2. No staff shall be negligent or ignorant toward any act of corruption involved directly with the Company and must notify their supervisors or responsible person and provide full cooperation during investigation.
3. The Company shall ensure fairness and protection of all staffs that deny or report corruption cases to Company as specified in the Protection Policy for appellants or whistleblowers.
4. Any act of corruption shall be considered as equivalent to misconduct against the Company's Code of Conduct and shall be liable to disciplinary actions as per the Company's rules and regulation. Legal punishment may also be enforced if such act is a legal violation.
5. The Company recognizes the importance of communicating and building knowledge and understanding among those involved in or affected by the Company's business operations regarding compliance with the defined Anti-Corruption Policy
6. The Company constantly ensures that appropriate and efficient audit procedures and internal control system existed within the organization to prevent corruptions.
7. The Company has developed human resource management system which clearly demonstrates its commitment in fighting against corruptions starting from recruitment, training, performance evaluation to remuneration and promotion processes.
8. To stress the attention on processes which incur high risk of corruption, the Board of Directors, the Management, and employees of every level must conform carefully in the following course of actions:

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Gift and Hospitality

The Company recognizes that building good relationships with business alliances is essential to driving continuous business success for the Company. Therefore, to give, receive a gift and the entertainment are appropriate and not contrary to policy and laws, the following guidelines have been established.

- 1) The directors, executives and employees of the Company are allowed in order to offer gifts and entertainment to business alliance under the following conditions:
 - Such an act must not be done in a manner which aims to influence or reward any person to gain inappropriate or hidden benefits or assistance.
 - Must abide by relevant laws, including regulations and requirements specified by the Company.
 - Must be given in the name of the Company only and transparently.
 - Must be of appropriate type and value. For instance, no gifts or entertainment should be given to government officials, employees, or relevant agencies during the bidding process.
 - Appropriate for the situation. For instance, gifts can be given during special holiday season as it is customary.
- 2) Directors, executives, employees and stakeholders of the Company are allowed to accept gifts or any other benefits given as part of special holiday season or traditional practice as long as the value of the gift does not exceed 3,000 Baht or according to the regulations of the country where the Company operates. And must not be in cash or cash equivalents such as gift vouchers.

In the event it is unavoidable to accept such gift or benefit, the receiver must immediately notify their supervisor and prepare a gift acceptance and handover report to be submitted to the Company's Administrative and Secretary Office to be used in rewarding the employees on special holiday seasons or making public donation as deemed appropriate.

Sponsorship and Donations

Sponsorships and Donations, it is a part that will give back to society and the environment. Including helping to create a good image for the company. Therefore, to support and donate appropriately and not a channel that may lead to corruption. The company therefore has set the following guidelines.

- 1) Donation in a form financial aid or others such as knowledge or time sharing, etc. can be carried out by the Company as part of corporate social activity, including public relations and building a good organizational image without expecting any business benefits.
- 2) Sponsorship either in a form of money or property for any activity or project must be transparent and in compliance with stipulated laws and must only identify the name of the Company. All sponsorships must be approved according to the Company's regulation and must not have a hidden purpose of commercial advantages by confirming that such transaction shall not be claimed as bribery.

All sponsorships must be given to support only those activities with business goals or for the Company's good image and can be done in various forms such as sponsorship for cultural activities, social and environmental activities or education and sports activities.

Political Contributions

The Company has no policy to make political contributions, either directly or indirectly. The following guideline of practice has therefore been developed:

- 1) The Company shall operate its business with political neutrality by avoid supporting or acting in favor of any political party in particular.
- 2) The Company shall not provide financial support or items to any political parties, politicians or candidates of any political party to gain business benefits.
- 3) All employees shall have the right to participate in political activities as stated in the Constitution of Thailand but shall not make any claims of being the Company's staff or use the Company's assets, equipment or tools for the benefits of their political activities. Employees involved in any political activities must make sure that their actions will not mislead others to think that the Company is assisting or acting in favor of any political parties.

Conflict of Interest

The Company is aware of conflicts of interest or conflicts between personal interests and the common interests of the Company. which is a problem that may cause fraud and corruption. Therefore, Directors, executives, employees, and stakeholders of the Company should avoid actions that involve conflicts of interest.

Any action must be in accordance with cause and effect based on actions taken for the benefit of the Company, not contrary to the rules, regulations, guidelines of the Company and ethics. If an event occurs that is considered to cause a conflict of interest with the Company. Directors, executives, employees, and stakeholders of the Company must report through the superior, the head of the risk management department or through complaints channels.

Facilitation Payment

The company does not have a policy to pay for convenience in any form. Directly and indirectly without taking any action and did not accept any action in exchange for facilitating business operations.

Revolving Door

The company has no policy to hire government officials who are still in the position. Or a former government employee who has retired from the position for not more than 2 years to work that causes a conflict of interest. The company will provide measures to disclose the employment of government employees or former government employees. To ensure transparency and auditability and if former government officials will take the position of consultants/directors/executives of the Company, the Company is ready to specify the reasons for appointing those persons in the Company's publications for transparency.

Hiring or appointing former government officials of the Company or practice any action related to the employment of government employees must be reviewed or approved by authorized person.

Whistleblowing or Complaints of Corruption Subject

1. Corrupt actions that are directly or indirectly related to the organization, such as witnessing a person in the organization bribing/accepting bribes of government officials or private entities.
2. Actions that violate the Company's procedures or affect the Company's internal control system. which causes suspicion that it may be a channel for corruption.
3. Actions that cause the company to lose benefits and affect the reputation of the company.
4. Illegal acts that violate business ethics.

Measures and Communication Channels for Whistleblowing/Complaints

The Company has determined measures for whistleblowing or raising complaints concerning any misconduct done by any directors, executives or employees and stakeholders of the Company that is in violation of the laws, Code of Business Ethics or any behavior that may lead to corruptions. Various channels of communication have been provided so that the employees and stakeholders can conveniently and appropriately report incidents or raise complaints with the Company. The whistleblower or complainant must notify the details of the incident or complaint including the contact address and phone number or reported anonymously through the provided channel.

The Company has arranged several communication channels for whistleblowing / complaints concerning corruption as follow:

1. Postal mail to Secretary Center

Thai Plaspac Public Company Limited
4th, floor Thai Plaspac Public Company Limited, No.77 Soi Thian Thaley 30,
Bang Khun Thian-Chay Thaley Road, Tha Kham, Bang Khun Thian, Bangkok, 10150.

2. Email

IR Center: IR@tpacpackaging.com
Compliance: Ethics@tpacpackaging.com
Secretary Center: Secretary@tpacpackaging.com

3. Telephone

Tel. 02-897-2250 ext. 179 (IR Center)

4. Electronic Box on the company website: www.tpacpackaging.com

5. Suggestion / comments / complaints box available within the Company

However, if the whistleblower or complainant has a complaint against the managing director or company secretary, please send your complaint directly to the Chairman of the Audit Committee. Persons who can report clues or complaints about corruption are all stakeholders of the company, including shareholders, customers, competitors. Government creditors, communities, society, executives, and employees of the Company. Regardless of whether you will be notified by any of the methods mentioned above, the company will keep your confidentiality.

Punishment

Directors, executives, employees, and stakeholders of the Company commits the misconduct, he or she is to be considered and punished according to disciplinary punishment of the Company and if said misconduct breaches the laws, he or she will be legally punished according to civil, criminal, or other laws. Penalties may be imposed one or more times at a time. Disciplinary punishment and/or decision of the Audit Committee or the Board of Directors are considered final.

If the complainer reports a falsehood or inaccurate information, the group will handle the complainant according to the Company's measures or procedures. Or according to applicable laws.

If the Company Supplier violates the provisions of this policy and whistleblowing policy or acknowledges any violation of this policy. However, failure to report or provide inaccurate information to the Company may result in termination of the contract in accordance with relevant laws.

The relevant actions must be carried out honestly, transparently, and accurately. And it must be able to verify that the information is true in all aspects and has not been changed or prepared in any way.

Communication and training**Internal communication**

The company values communication, to convey to employees in the organization, executives, including the Board of Directors have a better understanding of anti-corruption and encourage surveillance within the organization to increase participation in whistleblowing. When an action is found in the news of corruption, the company has set the communication as follows.

External communication

From the determination to conduct business without corruption, the company therefore promotes the business associate to participate in anti-corruption association to build a corruption-free business and corruption together. The company will send electronic mail. To express the clear intentions of the company and invite business partners to take part in anti-corruption. Also communicates business ethics for business partners via electronic mail. and sign the acknowledgment and compliance.

This Anti-corruption policy is amended according to the resolution of the Board of Directors' Meeting No. 06/2023 on 15 December 2023, effective from 15 December 2023 onwards.

Announced on 15 December 2023



(Mr. Yashovardhan Lohia)
Chairman of the Board of Directors

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