

Anti-Corruption Policy

Prodigy Public Company Limited, the "Company," recognizes the importance of transparent business operations. Fairly and with honesty because corruption is a problem and an obstacle to national development, the company has announced its intention to join the Thai private sector's collective action in combating corruption and has been approved to participate in the project since December 16, 2015 onwards.

Board of Directors Has established an anti-corruption policy. To serve as a guideline for practice and development. Towards a sustainable organization in the company's business operations and in accordance with the principles of good corporate governance every year, the Board of Directors has considered and reviewed the anti-corruption policy. To be consistent with the current situation with determination to conduct business in a transparent, fair, responsible and careful manner under relevant laws, rules, regulations, and standards.

Anti-corruption policy (Anti-Corruption Policy) of Prodigy Public Company Limited, The details are as follows:

1. Objectives of the policy

- 1.1 Shows the direction and framework of the company's operations about resisting and preventing Corruption. According to the principles and good practices that are accepted, it is suitable for adaptation to the economic environment and society of the country.
- 1.2 Enhance the knowledge, understanding, and cooperation of directors, executives, employees and related persons. Anti-corruption policy, to be a guideline, to promote the company. It is an organization with management manage well, be efficient, have code of conduct and ethics in doing business.
- 1.3 The company has a definition of not participating in any form of corruption and cooperate with other organizations in combating corruption.

2. Policy scope

- 2.1 Establish a policy against corruption and all forms of corruption, both inside and outside the organization. By complying with relevant laws and regulations, such as disclosing and reporting important company events, Including financial reports that are accurate, transparent, and timely.
- 2.2 Clear operations based on a good internal control system. Including inspections by the company's internal auditors. According to the internal audit plan set each year, and the financial statements are audited by independent external auditors who comply with the rules of the Securities and Exchange Commission. To prevent and eliminate corruption problems within the organization.
- 2.3 Review operational guidelines and requirements to be consistent with business changes, rules, regulations and legal requirements.

3. Define "corruption and bribes."

“Corruption” means the dishonest use of power or authority for the benefit of oneself or others. Including bribery, extortion, fraud, deception, conspiracy, cartel, embezzlement, money laundering, and other similar acts.

“Bribe” means any form of action that is an offer, promise, giving or acceptance claims that bring benefits in various forms in a manner that induces any action that is contrary to the law or contrary to duties and responsibilities.

Benefits in various forms Gives include gifts, services, cash or any other form of giving that may be given directly or through another person or for other people as well.

Inducing any action this shall include actions against government officials or private sector officials as well.

3.1 Patterns of corruption, bribes, and other related policies.

3.1.1 Political Contribution

Refers to providing financial support or encouraging employees to participate in political activities on Behalf of the company. To support political parties, politicians, or people involved in politics. Whether directly or indirectly. To obtain special privileges, illegitimate benefits or business advantages. (However, this does not include employees participating in political activities according to the principles of individual rights and freedoms.)

Political contributions that comply with the law are allowed. This must be done transparently and is disclosed appropriately and has been approved in principle by the company's Board of Directors or Executive Committee.

3.1.2 Charitable Contributions

Donating money, things, or any other benefits to any person or juristic person established, such as an association, foundation, public organization, temple, hospital, educational institution, or organization that benefits society. The objective is to provide public benefits to society without expecting anything in return or do not expect benefits from the organization that comes in to provide support.

Charitable donations are part of the company's corporate culture. To help the underprivileged in society and relieve suffering for those affected by natural disasters or to promote the quality of life universally both now and in the future. However, such charitable donations must be approved according to the process that the company has determined and done in a transparent manner, along with the clear objectives of the donation. There must be no donation made in order to evade corruption and bribes.

3.1.3 Providing support (sponsorship)

Refers to money paid to or received from customers, business partners, associations, foundations and Charities or non-profit organization. The objective is to promote the brand or reputation of the company. Which is beneficial to building trade credibility. It helps strengthen business relationships and suits the occasion.

Funding in general it is done to promote the image or reputation of the organization. This is usually done through various activities. Funding must be based on transparent decision-making criteria. There is a valid contract or proof of payment. This must be approved according to the process set by the company, and it must not provide any financial support that is done in the face of evading corruption and bribes.

3.1.4 Gift fees, welcome service fees, and other expenses related

Refers to various expenses that are paid for the value of any item at financial value. This includes things that are substituted for cash and things that can be exchanged for goods or services.

Gift fee, welcome service fee and other related expenses, it may lead to the risk of corruption. Therefore, all directors and employees must not accept or provide gifts or hospitality. It is generally realized that there is an expectation that the results will lead to corruption. However, if receiving or giving gifts or hospitality services There is no obligation or burden to create the feeling that there must be a return that is corruption and compliance with customs and traditions that are normally practiced It is something that can be done. If it complies with the criteria and code of ethics set by the company, If you are in a situation. Where you cannot refuse to receive such gifts or benefits at that time, the recipient must notify the supervisor immediately.

3.1.5 Facilitation Fee (Facilitation Payment)

Refers to a small sum of money paid informally to a government official. In order for government Officials to carry out the process or expedite the process, the process does not require the discretion of government officials. It is an action that is in accordance with the duties of that government official.

3.1.6 Hiring government employees (revolving door)

Refers to a person who is or used to be a government official, politician, or advisor of a government agency and went to work for the company and may rely on relationships or inside information to benefit. The company or cause conflicts of interest in the performance of duties of government agencies or business regulatory organizations with the company that is under supervision. The result of that action is intended to gain an unfair business advantage or setting policies conducive to the benefit of the company that former government officials worked.

3.1.7 Conflict of Interests

Refers to a conflict between personal and public interests, situations, or actions of directors, executives, employees, or other employees of the company who have personal interests that affect decision-making or the performance of duties in the position for which that person is responsible and affect the public interest. This action may occur consciously or unconsciously. Either intentionally or unintentionally, it has many different forms until it has become a common practice without seeing anything wrong with it. To the point that the person lacks fair decision-making because they are based on their own personal interests.

3.1.8 Change

Refers to money that the private sector must pay back to individuals involved in the corruption process. In return for receiving approval of the budget for the project. The rate to be repaid has been agreed upon in advance. This causes the private sector to propose a project value with a higher budget than it should be. So that the project can still be carried out after paying the money to the relevant people and often results in the quality of that project being lower than the budget received.

4. Anti-corruption measures and guidelines regarding anti-corruption and bribery.

The company is committed to implementing effective measures to combat corruption and bribery. This measure must be approved by the Board of Directors and communicated to all directors and employees as well as outsiders are regularly informed. To cultivate a culture that absolutely does not accept corruption and bribes.

Directors, executives, and employees do not accept corruption in all forms, both direct and indirect. It covers all businesses and all related departments and to have the practice reviewed. Follow the anti-corruption policy regularly as well as reviewing the practice guidelines and operating requirements. To comply with business changes, rules, regulations, and legal requirements.

5. Scope of application

This policy applies to directors, executives and employees of the company with the following definitions:

- 5.1 Company directors include directors of the company appointed by the general meeting of shareholders or Board of Directors meeting.
- 5.2 All sub-committees appointed by the Board of Directors.
- 5.3 Company employees including employees of all positions levels including managers and executives
High-level consultants, both full-time and temporary employees.

6. Duties and responsibilities

- 6.1 Board of Directors Has duties and responsibilities to set policies and supervise the company to have a system that support effective anti-corruption efforts. So that the management team is aware and gives importance to with anti-corruption and instilling it into organizational culture.
- 6.2 Audit Committee, as assigned by the Board of Directors Has duties and responsibilities for reviewing the internal control systems of various work systems in the company to have efficient practices and no corruption. Including reporting the results of corruption investigations to the Board of Directors.
- 6.3 Executive Committee and Executives Has duties and responsibilities for setting up systems and promoting and supporting anti-corruption policies. Including communicating with employees and all relevant parties. Review the appropriateness of the system and various measures. To comply with

changes in business, rules, regulations, and legal requirements.

- 6.4 Internal auditor has duties and responsibilities to inspect and review operations to ensure that they are in accordance with Correct, consistent with policy, guidelines and authority regulations, laws and regulations regulatory agencies. To ensure that there is a control system that is appropriate and adequate for risks. Report any corruption that may occur to the Audit Committee.
- 6.5 All employees must perform their duties in accordance with this policy. In the event of doubt or witnessing a violation of this policy, it must be reported to the supervisor or through specified reporting channels.

7. Other policies and practices that support anti-corruption measures

The company has internal control measures. To prevent corruption in high-risk matters by directors and executives and employees of the company every level must follow the guidelines for implementing the anti-corruption policy As follows:

7.1 Gifts, hospitality, and other expenses related

The company has a policy prohibiting company employees from receiving or giving gifts, entertainment or hospitality services. Other expenses including benefits in any form for customers and business partners of the company. Government agency or officials or people who have business ties with the company. To gain business or influence government officials acting incorrectly in the performance of duties for the benefit of the company or to have an impact on the operations of the company.

The guidelines for operations are as follows:

- a) Giving or receiving gifts, entertainment or hospitality services and other expenses related. This can only be done if it is the receipt of property or any other benefit according to business ethics or given according to etiquette practiced in society and must be performed on appropriate occasions.
- b) Company employees must follow the approval, control, and reporting procedures in accordance with the company's regulations.
- c) The company records expenses and has receipts or certified evidence.

7.2 Charitable Contributions, Donations and Grants in Aid

The company has a policy of donating to charity. The company can donate money or any property to charity. Helping individuals, communities, foundations, charitable associations, or any other legal entities with the purpose of helping Society and support various projects for society.

Guidelines for operations are as follows:

- a) The donation must be able to be verified and proven to have activities according to the project. For such charity, there is action. To support the success of the project objectives and truly bring

benefits to society or to meet the objectives of operating with social responsibility (Corporate Social Responsibility: CSR).

- b) The donation must be proven to be for charity and not involve any reciprocal benefit to any person or organization.

7.3 Support funds (sponsorship)

The company has a policy of providing financial support to individuals or juristic persons with the objective of promoting business operations. The good reputation and image of the company.

Guidelines for operations are as follows:

- a) It must be proven that the person applying for financial support has actually carried out activities according to the project and is carried out to support the success of the project's objectives and truly bring benefits to society or to meet the objectives of operating with social responsibility (Corporate Social Responsibility: CSR).
- b) The financial support must be proven as providing financial support or any other benefit that can be calculated in monetary terms such as providing accommodation and food etc.
- c) In providing support all supporting documents must be attached to the company's approval authority for approval.

7.4 Facilitation fees (facilitation payment)

The company has a policy of prohibiting the payment of facilitation fees to government officials in any case. Due to payment facilitation fees paid to government officials are at high risk of becoming bribes or is it an expense? that is unlawful.

Guidelines for operations are as follows:

- a) Company employees are prohibited from giving, requesting, or accepting that they will provide facilitation fees or bribes in the form of property or any other benefits to government officials. To induce action, not action or delay action. That affects the operations of the company.
- b) All dealings with the government sector must be transparent. Be honest and you must strictly comply with relevant laws.
- c) The company should clearly communicate such prohibitions to company employees and those who have business ties with the company. Acknowledged thoroughly.

7.5 Political Contributions

The company has a policy of not providing financial or material support to political parties, politicians or candidates any political activity, whether direct or indirect, in order to gain special rights or undue benefits legally or to facilitate business benefits for the company.

7.6 Conflict of Interests

The company has a conflict of interest policy. To focus on correct actions by directors and executives and employees at all levels must consider the best interests of the organization as important. Under the framework of accuracy, according to laws and business ethics avoid conflicts of interest both externally and within the organization. That may affect decision-making and the performance of duties.

Guidelines for operations are as follows:

- a) The company director and executives must notify the company. Know the relationships or related transactions in businesses that may cause conflicts of interest or seek personal benefits such as Joint stockholding in the company's competitors joint investment or holding a position with a partner who does business with the company doing business or providing services to the company directly or through others.
- b) Avoid making transactions related to related persons. As specified by the Capital Market Supervisory Board. That may cause conflicts of interest with the company and or its subsidiaries (that may occur in the future) in the event that it is necessary to make that transaction. The related transactions must be presented to the Audit Committee. To consider giving opinions before submitting them to the Board of Directors for approval. According to the principles of good corporate governance and regulations at the Stock Exchange, the Securities and Exchange Commission determines.
- c) Directors, executives, and employees must comply with the company's regulations and business ethics of the company This is an important matter that must be strictly adhered to. So that the company is trusted and trusted by all stakeholders and arrange for the dissemination of information to relevant parties and adhere to it universally.
- d) Directors, executives and employees must not seek benefits for themselves or others by relying on the company's confidential information. Including important information about the company for personal benefit.
- e) The company requires directors and executives who have significant interests in a manner that may prevent such directors or executives from expressing their opinions freely and does not take part in considering items in which he has a conflict of interest. Including having no authority to approve the entry into transactions on that agenda.

7.7 Hiring government employees (revolving door)

The company has no restrictions on hiring government employees. To hold the position of director, executive, employee or advisor of the company which must have a selection process. Employment approval Compensation determination and process. Control to ensure that such employment. It will not be in return for receiving any benefits. To benefit the company destroys the image of trustworthiness and honesty in performing duties. Which is at risk of corruption.

Guidelines for operations are as follows:

- a) Hiring government employees There must be a selection process. Employment approval The determination of remuneration must be transparent and control processes to ensure that hiring does not benefit the company or any reciprocal benefits.
- b) There is a process for checking the history (due diligence) of people at the company will recruit and appoint to serve as directors, consultants, and executives of the company. To check if there may be a conflict of interest before the appointment.
- c) There is a prohibition on performing duties that are an abuse of power or who have conflicting interests such as disclosing secrets of government agencies to which they were formerly affiliated or lobbying to gain illegitimate benefits. Being assigned to contact the same agency that you used to belong to etc.
- D) The company has been appointed by disclosing the names and histories of people who were former government officials. Who have been appointed as advisors, directors, and executives of the company.

7.8 Procurement

The organization's procurement processes must be open, truthful and compliant with all applicable policies and company purchasing regulations.

8. Anti-corruption risk assessment (Corruption Risk Assessment)

The company conducts a corruption risk assessment. That may occur in many different forms. Focusing on Performance of employees at all levels with opportunities for interaction or contact to work with government agencies, state enterprises or Outsiders.

Guidelines for operations are as follows:

- a) The company has assessed the risk of corruption that may occur with both specifying measurement. Risks regarding impact and likelihood of occurrence are specified risk from related operations and currently existing internal controls.
- b) Provide measures to reduce and control risks. To ensure that the risk is at a level acceptable to the organization.
- c) Company executives must understand the risks that may arise from corruption.
- d) The management must regularly assess potential corruption risks at least once a year. Review risk management measures to ensure they are appropriate to reduce risks to an acceptable level. Presented to the Risk Management Committee.

9. Internal control (internal control system)

The company will keep its internal control system effective to counter corruption and practice consistently internal controls. To build confidence in being able to comply with international standards and cover all aspects Financing and execution of accounting and logging processes and other related processes with anti-corruption measures.

Guidelines for operations are as follows:

- (a) Companies prepare financial statements and conduct their accounting processes accurately and transparently can be verified.
- (b) The company has a recording system, proof of financial records and information available for inspection. To confirm the accuracy of the anti-corruption proceedings.

10. Accounting and storage.

The company has an audit process and data storage to support its anti-corruption policy. Corruption is effective and preventive of all forms of corruption. A system of operations is a system of communications which is the fundamental foundation for building an effective control system. Proceed in a variety of ways to ensure that your work system and database information are protected. Ready to use or ready to inspect at any time in the company's business.

Guidelines for operations are as follows:

- (a) The company has an accounting audit process and proper approval prior to registration in the accounting system and will verify compliance with the company's policies, regulations, relevant laws, contracts or agreements in order to comply with accounting standards and accounting policies properly.
- (b) Operating costs and investment costs must be accurately documented, completed and approved in accordance with the financial limits specified by the approval authority.
- (c) The financial statements shall be accurate, reliable, and disclose accurately and fully relevant information, including information on the intersection and possible debts. The company has sufficient and secure accounting controls to be used for immediate verification. Access to accounting information is controlled, and backup files are safely stored.

11. Personnel management. (human resources)

The company has a human resources policy to support its anti-corruption policy. Efficient prevention of all forms of corruption.

Guidelines for operations are as follows:

- (a) The company has applied this policy to staff management since the recruitment process. The recruited staff must not commit disciplinary offenses or be guilty of corruption offenses. Furthermore, in displacement, performance assessment, and remuneration, the company must evaluate performance in accordance with the policy, and there is no history of corrupt acts or behavior that interferes with compliance with this policy.
- (b) The company does not decline its position, penalizing employees who deny corruption, even if it loses the company's business opportunity.
- (c) The company provides anti-corruption training and knowledge to employees at all levels so that they can be understood and actually implemented.
- (d) The company has comprehensive policy communication to its employees including a penalty for violation of the policy for all levels of employees of the company.

12. Creating awareness.

The company will arrange for the dissemination of information to business and stakeholders. As well as other parties should perform duties relating to the company or may influence the company in matters of compliance with the policy Anti-corruption by publishing corporate policies and practices.

13. Training and communication

The company attaches importance to communication and training, which are essential to the prevention of fraud, knowledge, understanding and awareness of the importance of implementing anti-corruption policies through. The company has channels to communicate such as introduction courses for new employees, training for employees and closure. Announced to know and understand anti-corruption policies in all their forms and the risks of involvement in Corruption as well as how to report or disclose corruption in cases of detection or suspicion.

The company will communicate its anti-corruption policy to corporate boards, executives, employees, shareholders, clients, and partners. All stakeholders business associates and business representatives are notified through appropriate communication channels for example, a booklet, a press briefing, so that every employee recognizes and signs to comply with their policy. You can view more information about the company's policies on various channels, such as: The intranet system, the company's websites, social media channels, and the 56-1 One Report.

In addition, on the part of a partner a client or a business partner in the company has been issuing a letter of request. Cooperate in compliance with the anti-corruption policies established by the company, whether through partners, clients, or Business colleagues, sign and accept, and send back a letter that has been signed and accepted. Company.

Tracking and Testing

The Board of Directors should evaluate and review this policy annually and Proposal to the Board of Auditors and Board of Directors to consider the approval of the amendments. Including regulation and follow the implementation of this policy and provide advice on a continuous basis.

Internal auditors must regularly review internal control systems and processes to ensure that internal control system is effective in combating corruption.

They will discuss the outcome of the review with the parties concerned to find appropriate remedies and report. Let the executive and audit committees be informed.

15. Prosecution of anti-corruption violations.

If the company's directors, executives, or employees violate its anti-corruption policies, they will be punished. By the company's judgment, the investigation board will be appointed on a case-by-case basis.

Employees should understand the content of this policy and follow it properly punish employees who violate the policy and cause damage to the company.

16. Policy and Practice

General chapter

- 16.1 Corporate executives and staff at all levels must abide by anti-corruption policies and to disregard the company's business and not process any claims or engage in any corruption. Directly or indirectly, covering all agencies and all external agencies. Government agencies, corporations, and private agencies that the company is involved in.
- 16.2 Employees are not dismissed or negligent when they discover corruption related to the company. Notify the officer or the person responsible and cooperate in the verification of the facts if any doubts or questions for consultation with the superintendent or the person assigned to be responsible for tracking the company's business practices through the channels specified.
- 16.3 The perpetrator of corruption is guilty of corporate misconduct, which is punishable Disciplinary proceedings as prescribed by the company, which may include dismissal, damages and penalties or criminally.
- 16.4 The company shall provide justice and protection to staff who deny or report corruption related to Companies use protection measures to protect the complainant or the person who cooperates in the investigation.
- 16.5 The company is committed to establishing and maintaining a corporate ethos that states that corruption is unacceptable. Transactions with the government and the private sector.
- 16.6 A senior executive must be good-looking and obey the prescribed measures.

17. Measures and channels for notification or complaint

The company provides measures to notify or complain about illegal acts. Business or behavior that may involve corruption by providing multiple channels of communication to Giving employees and stakeholders the opportunity to submit complaints to the company. Through the channels specified by the company,

- **By mail**
To the Chairman of the Board or the Chairman of Audit Committee
Prodigy Public Company limited
7/3 Moo 3 Sub-district Bangkrabao , Distric Nakornchaisri, Nakornpathom 73120
- **Email:** To Corporate Secretary E-mail: thitikan@prodigy.co.th
- **The company's website** is www.prodigy.co.th.
- **An internal feedback**, comment, or Suggestion box.

The company will protect the rights of the complainant and the data provider by retaining the data of the claimant and the information provider. Confidentiality, including supervision, to avoid any influence on the complainant and the information provider, and when the facts have been verified and the judgment has been made, the company will notify the reporting authorities and complainants of the results of the investigation.

This will come into effect on February 14, 2567.



(Prof. Prayoon Boonpraserd)

Chairman