



## Anti-Corruption Policy

### Objective

Loxley Public Company Limited and its subsidiaries (the “Company”) aim to conduct business ethically, upholding social responsibility and treating stakeholders in accordance with good corporate governance principles and the Business Code of Conduct. The Board of Directors Meeting No. 1/2015, held on March 2, 2015, passed a resolution to formally approve the Anti-Corruption Policy in writing to ensure that the Company has a defined responsibility policy and appropriate operational guidelines. This policy ensures that business decisions involving potential corruption risks are carefully considered and executed with due diligence.

### Definition

Fraud refers to any action taken to seek benefits that are unlawfully obtained for oneself or others. This includes embezzlement, fraud, and corruption.

Corruption refers to the act of giving or receiving bribes in any form by offering, promising to give, granting, pledging to give, demanding, or accepting money, assets, or any other benefits to a government official, government agency, private organization, or any person in a position of responsibility, either directly or indirectly, to influence that person’s actions or omissions in the performance of their duties, with the intention of obtaining or retaining business or other business-related benefits that are deemed inappropriate, unless permitted by law, regulations, announcements, rules, local customs, or commercial traditions.

Company Personnel refers to the directors, executives, and employees of the Company and its subsidiaries.

### Policy

The Company has established an anti-corruption policy in all forms to ensure transparent and fair business operations. The policy prohibits the Company’s directors, executives, employees, and relevant stakeholders, as well as agents acting on behalf of the Company, from engaging in or being associated with any actions related to corruption in all forms, whether direct or indirect. This applies to all businesses in all countries and all related entities. Regular reviews shall be conducted to ensure compliance with this policy, along with periodic assessments of operational guidelines to align with business changes, regulations, and legal requirements.

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## Scope

This Anti-Corruption Policy applies to the Company's directors, executives, employees, and relevant stakeholders, including agents acting on behalf of the Company, or entities in which Loxley Public Company Limited holds more than 50% of the voting shares, either directly or indirectly, associates, or entities under the Company's control.

## Responsibilities

### 1. Board of Directors

Establish policies and oversee the implementation of a system that supports effective anti-corruption measures to ensure that management is aware of and prioritizes anti-corruption efforts while promoting them as part of the corporate culture.

### 2. Audit Committee

2.1 Review the system and financial reports, internal control processes, and internal audit systems to ensure compliance with standards, suitability, and effectiveness. In addition, review to ensure that the Company has appropriate governance processes and risk management procedures in place.

2.2 Receive whistleblowing reports or complaints regarding fraud, corruption, or behavior that is inappropriate or violates the Business Code of Conduct. Review, investigate, and take necessary actions, including offering recommendations for improvement, and report findings to the Board of Directors.

### 3. The Head of Internal Audit

Reviews operations to ensure they are conducted correctly and in compliance with policies, procedures, and laws, to ensure that the Company has an adequate internal control system to manage the risks of potential corruption and reports to the audit committee.

### 4. Executive Committee, Management, and Executives

4.1 Promote and support anti-corruption efforts and implement anti-corruption policies. Communicate the policy and measures against corruption, including guidelines, laws, and relevant regulations to employees and relevant parties to ensure understanding and compliance.

4.2 Establish governance structures, risk management systems, and internal controls, as well as defining rules, regulations, guidelines, and disciplinary actions. Review the appropriateness of systems and measures to align with changes in business, regulations, and legal requirements.

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4.3 Provide channels for whistleblowing or receiving complaints, including protective measures for whistleblowers and complainants.

4.4 Assess the risks of potential corruption and review risk management measures to ensure they are at an acceptable level.

5. Employees

Must understand and comply with the Anti-Corruption Policy, refraining from being involved in corruption, either directly or indirectly.

## Guidelines

1. Company personnel must adhere to the Anti-Corruption Policy and the Business Code of Conduct, avoiding any involvement in corruption, whether direct or indirect. They must not give money, assets, or any benefits to stakeholders that could influence business decisions, improper conduct, or provide unfair advantages to customers, partners, government officials, or business associates.
2. Company personnel must not ignore or overlook any actions that may be considered corruption related to the Company. It is their duty to report such actions to their supervisor or the designated responsible person and cooperate in investigating the facts. If there are doubts or inquiries, they should consult with their supervisor or the designated responsible person through the channels provided.
3. The Company will ensure fairness and protection for its personnel who refuse or report corruption related to the Company.
4. The Company recognizes the importance of disseminating knowledge and ensuring understanding among other individuals who are responsible for duties related to the Company or who may impact the Company regarding the requirements to comply with this Anti-Corruption Policy. The Company will take appropriate actions to ensure that agents, contractors, or any individuals acting on behalf of the Company are informed of the principles outlined in this policy.

## Measures Related to Anti-corruption Practices

1. Any actions taken under the Anti-Corruption Policy should follow the guidelines outlined in the Corporate Governance Handbook, Business Code of Conduct, work regulations, and other relevant Company operational manuals, as well as any policies and guidelines that the Company may establish in the future.
2. To ensure clarity in dealing with high-risk activities for corruption, Company personnel must perform their duties with caution, in accordance with the Company's code of conduct, policies, and guidelines on the following matters:

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- 2.1 **Procurement** activities must be conducted in accordance with the criteria or guidelines set forth in the procurement policy. These activities must be fair, transparent, and ethical. Company personnel must not engage in any business that may result in personal gain by using their position in procurement, whether directly or indirectly, nor use information obtained from procurement activities for personal or others' benefit.
- 2.2 **Giving and receiving gifts, souvenirs, and business entertainment** in accordance with customary business practices may be done reasonably and for the benefit of the Company's business. However, it must not violate local customs, laws, or regulations both domestically and internationally, nor should it affect work-related decision-making or cause conflicts of interest. This must be done in accordance with the Company's No Gift Policy and Guidelines for Receiving and Offering Gifts, Hospitality, and Other Benefits.
- 2.3 **Charitable donations and sponsorships** Donations and sponsorships to government agencies or government officials, business partners, or any legally established organization must be conducted transparently and in compliance with the law, on behalf of the Company. This must be done according to the Company's relevant policies and without consideration of reciprocal benefits or using it as a means for corruption.
- 2.4 **Transactions with government authorities and liaison with government officials** The Company has a policy of not supporting the payment of facilitation fees that may lead to corruption. Transactions with government authorities must be conducted correctly, transparently, and in compliance with the relevant laws.
- 2.5 **Political activities support** The Company has a policy of conducting business with political neutrality and encourages company personnel to exercise their political rights and freedoms in accordance with the law. Any support or participation in political activities must be done in a personal capacity and must not involve actions that may damage the Company or create the impression that the Company is involved.

## Communication and Training

The Company will ensure communication and dissemination of the Anti-Corruption Policy to employees through various channels, including orientation for new directors and employees, training or seminars, internal publicity within the workplace, and through the Company's electronic systems. All employees will be made aware of the policy to understand their duties and responsibilities, as well as communicating with stakeholders and other individuals whose duties are related. The Company will review this policy at least every 3 years or when there are significant changes and will publish the Anti-Corruption

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Policy on the company website at [www.loxley.co.th](http://www.loxley.co.th) and the intranet so that employees can review it at any time.

In addition, the Company will encourage communication of this policy to partners and stakeholders involved in the Company's business operations to ensure that these individuals are aware of and adhere to this policy and its guidelines.

### **Disciplinary Actions**

The company personnel who do not comply with this policy will be considered as having committed a disciplinary offense and will be subject to disciplinary action in accordance with the Company's established regulations. Furthermore, they may face legal penalties if their actions violate the law, both civil and criminal.

### **Complaint Channels**

All stakeholders can report tips or complaints about actions that may raise concerns about violations of ethics or the potential risk of corruption related to the Company to independent directors or the audit committee, through the following complaint channels:

Secretary of the Audit Committee  
Loxley Public Company Limited  
102 Na Ranong Road, Khlong Toei Sub-district, Khlong Toei District, Bangkok 10110  
or E-mail: [ac@loxley.co.th](mailto:ac@loxley.co.th)

The Company will listen to all complaints and handle them equitably, transparently, and fairly, with an appropriate timeframe for processing. It will maintain confidentiality to protect the safety of the complainant. The independent directors or audit committee will investigate the issue and report directly to the Board of Directors.

This policy will be effective from February 27, 2025 onwards.

Announced on February 27, 2025

(Mr. Dhongchai Lamsam)

Chairman of the Board

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