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Corporate Governance Policy

Premier Tank Corporation Public Company Limited (hereinafter referred to as "the Company") has established a "Corporate Governance Policy" to guide the company's governance. This policy emphasizes conducting business with transparency, morality, ethics, and integrity based on a business code of conduct, and serves as a guideline for the Board of Directors, executives, and employees of the Company and its subsidiaries in creating maximum value and returns for the business in the long term for sustainable growth, as well as building confidence for shareholders and all stakeholder groups.

The Board of Directors, as the highest leadership of the organization, has therefore established this policy and guidelines for the Board of Directors. This is achieved by adapting the 8 core principles, sub-principles, and guidelines of the Corporate Governance Code (CG Code) for listed companies in 2017, issued by the Securities and Exchange Commission, to suit the company's business context, to serve as a proper and appropriate guideline for the directors for the benefit of creating sustainable value for the company.

Objectives and Scope

The Company intends to conduct its business in accordance with good corporate governance principles and is committed to promoting and developing the Company into an efficient organization, adhering to ethical operations with transparency, and being responsible to relevant stakeholders such as shareholders, employees, customers, business partners, competitors, creditors, communities and society, and the environment.

Definitions

Company/Organization : Premier Tank Corporation Public Company Limited

Subsidiary : A company or legal entity that Premier Tank Corporation Public Company Limited

Board of Directors : A sub-committee established by the Board of Directors to consider the criteria and processes for the nomination and remuneration of directors and senior executives, to screen qualified individuals for directorships for approval by the Board of Directors, and to propose the appointment of senior executives for approval by the Board of Directors.

Audit Committee : A sub-committee established by the Board of Directors to oversee that the company's reports are accurate, complete, and in accordance with reporting standards, and has adequate and appropriate internal control and internal audit systems. The composition, qualifications, and responsibilities shall be as prescribed by the Securities and Exchange Commission and the Stock Exchange of Thailand.

Risk, Corporate Governance, and Sustainability Committee : A sub-committee established by the Board of Directors to support the Board in driving the management of risks by the management to ensure risk management measures are at an acceptable level for the organization, including overseeing operations to

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develop sustainability in social, environmental, and governance dimensions, as well as communicating and monitoring the results of risk management related to business operations and sustainability initiatives.

Director : A director of the company, whether or not holding an executive position or an executive position involved in the company's management, and may or may not be an independent director.

Independent Director : A director who is not involved in the management of the company and its subsidiaries, has no financial interest, is independent from management and controlling shareholders, and has no business relationship with the company that would restrict their independent opinion, with independent qualifications as prescribed by the Securities and Exchange Commission and the Board of Directors.

Management : A group of management-level individuals with the authority to manage, direct, and oversee operations to achieve the defined objectives and goals of the organization.

Employee : Employees from department manager level downwards of the company and its subsidiaries.

Executives : The top four executives immediately below the Chief Executive Officer (as defined by the SEC).

Senior Executive : Individuals holding executive positions at Premier Tank Corporation Public Company Limited (including managing directors of subsidiaries).

Stakeholders : Individuals and/or legal entities involved in the company's business operations, including directors and executives, employees, shareholders, customers, business partners, competitors, creditors, communities, society, and the environment, etc.

Shareholders of Premier Tank Corporation Public Company Limited

Policies and Guidelines based on Good Corporate Governance Principles

The Board of Directors has duties according to the following principles:

Principle 1: Recognizing the Board's role and responsibility as an organizational leader in creating sustainable value

Guideline 1.1

The Board of Directors must understand its role, recognize its responsibility as a leader, and oversee good corporate governance, which includes

1. Define objectives and goals
2. Define strategies, operational policies, and allocate key resources to achieve objectives.
3. Monitoring, evaluation, and oversight of performance reporting

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Guideline 1.2

Corporate governance leading to sustainable value creation for the enterprise, including at least the following:

1. Be able to compete with good performance, considering long-term impacts.
2. Conduct business ethically, respect rights, and be responsible to shareholders and stakeholders.
3. Benefit society and develop or reduce negative environmental impacts.
4. Be adaptable to changing factors.

Guideline 1.3

The Board of Directors has a duty to ensure that all directors and executives perform their duties with due care and loyalty to the organization, and to ensure that operations comply with laws, regulations, resolutions of shareholders' meetings, business ethics policies and/or codes of conduct for directors, executives, and employees, and guidelines to promote compliance, including regular monitoring of compliance. In performing their duties with responsibility, directors and executives must act as prudent business persons.

Such actions should be taken under the same circumstances at the time of decision-making and must fully possess the following characteristics:

1. Act in good faith, reasonably, and primarily for the best interests of the company.
2. Act based on sufficient information
3. Act without any direct or indirect conflict of interest

Guideline 1.4

The Board of Directors should understand the scope of its duties and responsibilities and clearly define the scope of delegation of duties and responsibilities to the Chief Executive Officer and management, as well as monitor and ensure that the Chief Executive Officer and management perform their assigned duties by

1. Prepare a Board Charter specifying the duties and responsibilities of the Board of Directors to serve as a guideline for all directors in performing their duties, and regularly review the said charter, including regularly reviewing the segregation of duties between the Board of Directors and management.
2. Delegate management authority to management in writing, and the Board of Directors monitors management to perform their assigned duties.

Matters that the Board of Directors should oversee for implementation (the Board of Directors is appropriately primarily responsible)

- a. Defining the main objectives and goals for conducting business
- b. Fostering an organizational culture committed to ethics, including acting as a role model

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- c. Ensuring that the structure and operations of the Board of Directors are appropriate for efficiently achieving the main business objectives and goals
- d. Recruitment, development, compensation, and performance evaluation of the Chief Executive Officer
- e. Establishing a compensation structure that incentivizes personnel in alignment with the organization's main objectives

Matters for the Board of Directors in conjunction with management (the Board of Directors considers with management and assigns management to implement within the policy framework approved by the Board of Directors, with periodic monitoring by the Board of Directors)

- a. Defining and reviewing strategies, goals, and annual plans
- b. Ensuring the adequacy and appropriateness of risk management and internal control systems
- c. Defining operational authority appropriate to the responsibilities of management
- d. Establishing frameworks for resource allocation, development, and budgeting, such as human resource management policies and plans, and information technology policies
- e. Monitoring and evaluating performance
- f. Ensuring the reliability of financial and non-financial information disclosure

Principle 2: Establish the main objectives and policies of the business for sustainability.

Guideline 2.1

Establish or ensure that the company's main objectives and goals (Objective) are for sustainability and align with creating value for the organization, customers, stakeholders, and society as a whole.

1. Be responsible for ensuring that the company has clear and appropriate main objectives or goals that can serve as a core concept for defining the business model and communicating it to everyone in the organization to move in the same direction, by establishing a vision and shared organizational values that reflect the characteristics of good corporate governance, such as accountability for actions, fairness, transparency, and care.
2. Define a business model that can create value for the organization, stakeholders, and society as a whole simultaneously.
 - a. The changing environmental factors, including the appropriate adoption of innovation and technology.
 - b. Needs of customers and stakeholders.
 - c. Readiness, expertise, and competitiveness of the business.

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Guideline 2.2

Oversee to ensure that the company's objectives and goals, as well as medium-term and/or annual strategies, align with achieving the organization's main objectives and goals, through the appropriate and safe adoption of innovation and technology.

1. Oversee that the formulation of annual strategies and action plans aligns with the company's main objectives and goals, taking into account the company's current environmental factors, as well as acceptable opportunities and risks, and should support the development or review of objectives, goals, and strategies for a 3-year period to ensure that annual strategies and action plans consider longer-term impacts.
2. Ensure that environmental factors, various factors, and risks that may affect relevant stakeholders and potentially impact the achievement of the company's main goals are analyzed when defining annual strategies and action plans.
3. Oversee the communication of objectives and goals through strategies and action plans throughout the organization.
4. Monitor and ensure the implementation of strategies and report operational results to the board of directors quarterly, as well as provide useful recommendations to management.

Principle 3: Strengthen Board Effectiveness

Guideline 3.1

Responsible for defining and reviewing the Board's structure, including its size, composition, and the appropriate and necessary proportion of independent directors to lead the organization towards its defined objectives and main goals.

1. Ensure that the Board of Directors comprises directors with diverse qualifications, including skills, experience, abilities, and specific attributes, as well as gender and age, necessary to achieve the organization's objectives and main goals. Additionally, there must be at least one non-executive director with experience in the company's core business.
2. Have an appropriate number of directors who can perform their duties effectively, with a suitable balance between executive and non-executive directors. The majority should be non-executive directors who can provide independent opinions on management's performance.
3. The number and qualifications of independent directors must comply with the criteria of the Securities and Exchange Commission and the Stock Exchange of Thailand, with at least one-third of the total number of directors being independent directors, but not less than 3 persons.
4. Ensure that independent directors can work effectively with the entire Board.

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Guideline 3.2

Consider and select a suitable person as Chairman, and ensure that the composition and operations of the Board facilitate independent judgment in decision-making.

1. The Chairman and the Chief Executive Officer have different duties and responsibilities. The Board of Directors must clearly define their authorities to prevent any single individual from having unlimited power.
2. The Chairman plays a leadership role on the Board of Directors. The duties of the Chairman should at least cover the following matters:
 - a. Supervise, monitor, and ensure that the Board's performance is efficient and achieves the organization's objectives and main goals.
 - b. Ensure that all directors participate in promoting a culture of good corporate governance ethics.
 - c. Allocate sufficient time for management to present matters and for directors to thoroughly discuss important issues collectively, encouraging directors to exercise careful judgment and provide independent opinions.
 - d. Promote good relationships between executive and non-executive directors, and between directors and management.
1. The Board of Directors considers appointing sub-committees to screen information, carefully review details, and propose recommendations for consideration before submitting them to the Board for approval.
2. Ensure the disclosure of the roles and responsibilities of the Board of Directors and sub-committees, the number of meetings, and the attendance of each director in the past year, and report on the performance of all sub-committees.

Guideline 3.3

Oversee that the nomination and selection process for directors is transparent and clear, to ensure a Board of Directors with qualifications consistent with the defined composition.

1. Establish a Nomination and Remuneration Committee, with the majority of its members and the chairman being independent directors.
2. The Nomination and Remuneration Committee arranges meetings to consider suitable qualification criteria for directorships, select individuals according to the defined nomination process, and individuals nominated by minority shareholders according to company criteria. It then submits recommendations to the Board for screening before presenting them to the shareholders' meeting for director appointment. Shareholders must receive sufficient information about the nominated individuals to make informed decisions.
3. The Nomination and Remuneration Committee reviews the criteria and methods for director nomination to make recommendations to the Board before the nomination of directors whose terms are expiring.

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In cases where the Nomination Committee proposes the re-nomination of an existing director, their performance should also be considered.

4. In cases where the Board of Directors has appointed any person as an advisor to the Nomination and Remuneration Committee, information about that advisor must be disclosed in the annual report, including their independence or absence of conflicts of interest.

Guideline 3.4

When proposing director remuneration for shareholder approval, the Board of Directors should consider whether the remuneration structure and rates are appropriate for the responsibilities and incentivize the Board to lead the organization towards its goals.

1. Establish a Nomination and Remuneration Committee, with the majority of its members and the chairman being independent directors, to consider policies and criteria for determining remuneration.
2. Director remuneration should align with the company's strategy and goals, experience, duties, scope of roles and responsibilities, as well as the expected benefits from each director. Directors assigned additional duties and responsibilities, such as being members of sub-committees, should receive appropriate additional remuneration.
3. The Nomination and Remuneration Committee is responsible for considering appropriate criteria and forms of director remuneration, including both monetary and non-monetary forms, fixed remuneration, and performance-based remuneration linked to the value the company creates for shareholders. However, it should not be excessively high to the point of encouraging a focus solely on short-term performance. These recommendations are then submitted to the Board of Directors for approval before being presented to the shareholders' meeting for consideration and approval.
4. Disclose the policy and criteria for determining director remuneration, reflecting the duties and responsibilities of each individual, as well as the form and amount of remuneration.
5. In cases where the Board of Directors has appointed any person as an advisor to the Nomination and Remuneration Committee, information about that advisor should be disclosed in the annual report, including their independence or absence of conflicts of interest.

Guideline 3.5

Oversee that all directors are responsible for performing their duties and allocating sufficient time.

1. Ensure that mechanisms are in place to support directors in understanding their roles and responsibilities.
2. Establish criteria for directors holding positions in other companies, considering the performance efficiency of directors holding multiple positions and to ensure that directors can dedicate sufficient time to their duties at the company. The number of listed companies each director may hold positions in, including the company itself, should not exceed 5. A system for reporting other directorships should

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be in place and disclosed. For senior executives holding directorships in other companies, approval from the Board of Directors is required.

3. Ensure that the company has adequate preventive measures or appropriately informs shareholders in cases where a director holds a directorship or executive position, or has a direct or indirect interest in another business that has a conflict of interest, or can use the company's opportunities or information for their own benefit.
4. Each director should attend at least 75% of all Board of Directors meetings held during the year. On average, the entire Board should attend no less than 80% of all Board meetings in the past year.

Guideline 3.6

Oversee the establishment of a framework and mechanisms for supervising the policies and operations of subsidiaries and other significant investments of the company, at a level appropriate for each entity.

1. Consider establishing a policy for the supervision of subsidiaries, which includes:
 - a. The appointment of individuals as directors, executives, or controlling persons in subsidiaries should be in writing. Generally, the Board of Directors should make such appointments, unless the subsidiary is a small company acting as an operating arm of the company, in which case the Board may delegate the appointment to the Chief Executive Officer.
 - b. Define the scope of duties and responsibilities of individuals representing the company as per item (a) and ensure that the company's representatives oversee compliance with the parent company's policies.
 - c. Ensure that subsidiaries have appropriate and sufficiently robust internal control systems, and that all transactions comply with relevant laws and regulations.
 - d. Disclosure of financial status, operating results, related party transactions, acquisition or disposal of assets, significant transactions, capital increase, capital decrease, and dissolution of subsidiaries.
2. If it involves significant investment in other businesses, such as holding voting shares between 20% and 50%, and the investment amount or potential additional investment is significant to the company, the Board should, if necessary, ensure the preparation of a Shareholders' Agreement or other agreements to clarify management authority, participation in important decisions, and performance monitoring. This is to ensure that the information can be used for preparing the company's financial statements according to standards and deadlines.

Guideline 3.7

Arrange for annual performance evaluations of the Board of Directors, sub-committees, and individual directors. The evaluation results should be used for further performance development.

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1. The Board of Directors and sub-committees should evaluate their performance at least once a year to collectively review achievements and issues for improvement, with established benchmarks for systematic comparison with performance results.
2. Evaluations are conducted both collectively and individually through self-assessment. The criteria, procedures, and overall evaluation results are disclosed in the annual report.
3. The Board of Directors may consider engaging external consultants to assist in defining guidelines and recommending issues for the Board's performance evaluation.

Guideline 3.8

Oversee that the Board of Directors and each director possess knowledge and understanding of their roles, the nature of the business, and relevant business laws, and support all directors in continuously enhancing their skills and knowledge for performing their duties.

1. Ensure that newly appointed directors receive an orientation and beneficial information for performing their duties, including an understanding of the company's objectives, main goals, vision, mission, organizational values, as well as its business nature and operational guidelines.
2. Ensure that directors receive continuous necessary training and knowledge development.
3. Directors should have an understanding of laws, regulations, standards, risks, and the business environment, and be regularly informed of current information.
4. Mandate the disclosure of information regarding the continuous training and development of the Board of Directors in the annual report.

Guideline 3.9

Ensure that the Board's operations proceed smoothly, that necessary information is accessible, and that there is a Company Secretary with the knowledge and experience required and appropriate to support the Board's operations.

1. Arrange for board meeting schedules and agendas to be set in advance to enable directors to manage their time and attend meetings.
2. The number of Board meetings is determined to be appropriate for the Board's duties and responsibilities and the company's business nature, but not less than 5 times per year. Management is required to report operational results to the Board in months without meetings, enabling the Board to continuously and timely oversee management's performance.
3. Ensure mechanisms are in place for directors, as well as management, to independently propose beneficial matters for discussion at meetings.
4. Meeting documents are distributed to directors at least 7 days before the meeting date.

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5. Encourage the Chief Executive Officer to invite senior executives to Board meetings to provide additional detailed information directly related to issues, and to allow directors to get acquainted with senior executives for succession planning considerations.
6. Access to necessary additional information can be obtained from the Chief Executive Officer, Company Secretary, or other assigned executives within the defined policy scope. If necessary, the Board may obtain independent opinions from external consultants or professionals, with the cost borne by the company.
7. It is a policy that non-executive directors have the opportunity to meet among themselves as necessary, at least once a year, to discuss various management issues of interest, without the presence of management, and to inform the Chief Executive Officer of the meeting outcomes.
8. Define appropriate qualifications and experience for the Company Secretary to perform duties in advising on legal and regulatory matters and Board activities, as well as coordinating compliance with Board resolutions. This includes disclosing the qualifications and experience of the Company Secretary in the annual report and on the company's website.
9. The Company Secretary must receive continuous training and knowledge development that is beneficial for performing their duties, especially through certified programs.

Principle 4: Recruitment and Development of Senior Executives and Personnel Management

Guideline 4.1

Ensure the recruitment and development of senior executives possess the necessary knowledge, skills, experience, and qualifications to drive the organization towards its goals.

1. Monitor and ensure the presence of suitable senior executives by considering or assigning the Nomination and Remuneration Committee to consider the criteria and methods for recruiting and appointing qualified individuals to senior executive positions.
2. Oversee the establishment of a Succession Plan to prepare for the succession of senior executives.
3. Promote and support the training and development of senior executives to enhance their knowledge and experience beneficial to their performance.
4. Clearly define policies and procedures for senior executives holding directorships in other companies, including the types of directorships and the number of companies in which they may serve.

Guideline 4.2

Oversee the establishment of appropriate remuneration structures and performance evaluations.

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1. Establish a remuneration structure that incentivizes company employees in alignment with the organization's short-term and long-term objectives and main goals, ensuring appropriate and fair performance evaluations.
2. Assign the Nomination and Remuneration Committee to consider criteria for performance evaluation and remuneration structures for senior executives, and to submit recommendations to the Board of Directors for approval of the senior executive remuneration structure.

Guideline 4.3

Monitor and oversee the management and development of personnel to ensure appropriate numbers, knowledge, skills, experience, and motivation, and to ensure fair treatment to retain talented personnel within the organization. This includes overseeing the establishment of a provident fund or other mechanisms to ensure employees have sufficient savings for retirement, as well as supporting employees in understanding financial management, selecting investment policies aligned with their age and risk level, or ensuring age-appropriate balanced investment policies.

Principle 5: Promoting Innovation and Responsible Business Conduct

Guideline 5.1

Emphasize and support the creation of innovations that generate value for the business while simultaneously benefiting customers or stakeholders, and demonstrating responsibility towards society and the environment.

1. Emphasize the creation of an organizational culture that promotes innovation and ensure that management incorporates it into strategic reviews, operational development and improvement planning, and performance monitoring under quality and environmental management system standards.
2. Promote innovation to enhance the value of the business in response to constantly changing environmental factors, which may include defining business models, perspectives on product and service development, research, process improvement, and collaboration with partners.

Guideline 5.2

Oversee that management conducts business ethically, is socially and environmentally responsible, and that this is reflected in operational plans to ensure alignment with the organization's objectives and strategic plans.

1. Ensure mechanisms are in place to guarantee that the company conducts business ethically, is socially and environmentally responsible, and does not violate the rights of stakeholders, serving as a guideline

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for all parts of the organization to achieve sustainable primary objectives and goals, by establishing policies or guidelines that should at least cover the following matters:

- a. Responsibility towards employees and staff, by complying with relevant laws and standards, treating employees and staff fairly, and respecting human rights, including fair compensation and other benefits, providing welfare no less than legally required or more as appropriate, ensuring occupational health and safety, providing training to develop potential and promote career advancement, and offering opportunities for employees to develop diverse work skills.
- b. Responsibility towards customers, by complying with relevant laws and standards, and considering health, safety, fairness, customer data protection, after-sales service throughout the product and service lifecycle, monitoring and evaluating customer satisfaction for product and service development and improvement, as well as conducting advertising, public relations, and sales promotions responsibly, without causing misunderstanding or exploiting customer misunderstandings.
- c. Responsibility towards business partners, by having procurement processes, establishing criteria for partner selection, and fair contract terms or agreements. Providing knowledge, developing potential, and enhancing the ability to present products and services to meet standards. Clarifying and ensuring that partners respect human rights and treat their own labor fairly, are socially and environmentally responsible, and monitoring, inspecting, and evaluating partners for sustainable business development between them.
- d. Responsibility towards the community, by applying business knowledge and experience to develop comprehensive projects that can concretely enhance benefits for the community, with long-term monitoring and evaluation of progress and success.
- e. Responsibility towards the environment, by preventing, reducing, managing, and ensuring that the company does not create or cause negative impacts on the environment, which includes the use of raw materials, energy consumption, water usage, use of renewable resources, emission and management of noise generated from business operations, greenhouse gas emissions, etc.
- f. Fair competition, by conducting business openly and transparently and not creating unfair competitive advantages.
- g. Anti-corruption, by complying with relevant laws and standards, establishing and publicly announcing an anti-corruption policy, and participating as a network partner in anti-corruption efforts.

Guideline 5.3

Monitor and ensure that management allocates and manages resources efficiently and effectively, considering the impact and development of resources throughout the supply chain, to achieve primary

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objectives and goals while upholding ethical principles, responsibility, and creating value for the organization.

Guideline 5.4

Oversee and manage enterprise-level information technology that aligns with business needs, and ensure that information technology is utilized to enhance business opportunities, develop operations, and manage risks, enabling the enterprise to achieve its primary objectives and goals.

1. Establish a policy on the allocation and management of information technology resources, which includes ensuring sufficient resource allocation for business operations and defining guidelines to address situations where resources cannot be allocated sufficiently as specified.
2. Ensure that the organization's risk management covers information technology risk management, by complying with laws, regulations, rules, and various measures related to the use of information technology. Implement measures for managing information technology risks in various aspects, allocate and manage information technology resources, and establish criteria and factors for prioritizing information technology plans.
3. Convene meetings and establish policies and measures for information system security that are consistent with the business, including a data security system for maintaining confidentiality, integrity, and availability of data, as well as preventing unauthorized use or alteration of data.

Principle 6: Ensure appropriate risk management and internal control systems are in place.

Practice 6.1

Oversee to ensure that the company has effective risk management and internal control systems to achieve its objectives efficiently and that operations comply with relevant laws and standards.

1. Understand the significant business risks and approve acceptable risk levels.
2. Consider and approve risk management policies that align with the company's objectives, key goals, strategies, and acceptable risk levels, to serve as a framework for risk management operations for everyone in the organization to proceed in the same direction. The Board of Directors emphasizes early warning signs and ensures that risk management policies are reviewed annually.
3. Ensure the company identifies risks by considering both internal and external factors that may prevent the company from achieving its stated objectives.

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4. Ensure the company assesses the impact and likelihood of identified risks to prioritize them and implement appropriate risk management methods.
5. Assign the Risk Management, Corporate Governance, and Sustainability Committee to screen items 1-4 before proposing them to the Board of Directors for consideration as appropriate for the business.
6. Regularly monitor and evaluate the effectiveness of risk management.
7. Ensure the company conducts business in compliance with domestic and international laws and standards.
8. Incorporate the results of internal control and risk management system evaluations into the consideration of items 1-7, in cases where the company has subsidiaries or other significant investments (e.g., holding voting rights between 20% and 50%).

Practice 6.2

Establish an Audit Committee that can perform its duties efficiently and independently.

1. Establish an Audit Committee comprising at least 3 directors, all of whom must be independent directors, and possess qualifications and duties in accordance with the criteria of the Office of the Securities and Exchange Commission and the Stock Exchange of Thailand.
2. Define the duties of the Audit Committee in writing, which shall include at least the following:
 - a. Review to ensure the company's financial reporting is accurate and complete.
 - c. Inquire to ensure the company complies with securities and exchange laws, as well as other relevant laws and standards.
 - d. Consider the independence of the internal audit unit, as well as approve the appointment, transfer, or removal of the head of the internal audit unit or other units responsible for internal audit.
 - e. Consider, select, and propose independent individuals to serve as auditors, and consider and propose their remuneration, as well as meet with the auditors at least once a year without management present.
 - f. Consider connected transactions or transactions that may involve conflicts of interest to ensure compliance with relevant laws, and that such transactions are reasonable and for the company's best interest.
 - g. Accuracy of reference documents, self-assessment forms regarding the company's anti-corruption measures under the Collective Action Coalition Against Corruption (CAC) project.
 - h. Review risk management processes, such as strategic risk, operational risk, financial risk, compliance risk, social and environmental risk. The Audit Committee must demonstrate the adequacy of the risk management and internal control systems and disclose them in the annual report.
3. Ensure the company provides mechanisms or tools that allow the Audit Committee to access necessary information for performing its assigned duties, such as facilitating the Audit Committee's ability to summon

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relevant persons for information, consult with auditors, or seek independent opinions from other professional advisors to support the Audit Committee's considerations.

4. Appoint an independent internal audit person or unit responsible for developing and reviewing the effectiveness of the risk management and internal control systems, and report to the Audit Committee and disclose the review report in the annual report.

Practice 6.3

Monitor, oversee, and manage potential conflicts of interest between the company and management, the Board of Directors, or shareholders, including preventing improper use of company assets, information, and opportunities, and engaging in inappropriate transactions with related parties.

1. Monitor and ensure the company establishes a data security system, including policies and practices for maintaining confidentiality, integrity, and availability of data, as well as managing data that may affect the securities pricing system. Additionally, the Board should ensure that directors, senior executives, employees, and relevant external parties, such as legal advisors and financial advisors, comply with the data security system.

2. Oversee the management and monitoring of transactions that may involve conflicts of interest, and ensure that guidelines and procedures are in place for such transactions to comply with legal requirements for execution and disclosure, primarily for the benefit of the company and its shareholders as a whole, with interested parties not participating in the decision-making.

3. Require directors to report conflicts of interest at least before the consideration of Board of Directors' meeting agendas and record them in the Board meeting minutes. The Board must ensure that directors with significant conflicts of interest, which may prevent them from providing independent opinions, abstain from participating in the discussion of that agenda item.

4. Require all directors and executives to report their securities holdings as per legal requirements, submit such reports to the Board of Directors quarterly, and disclose them in the annual report.

Practice 6.4

Oversee the establishment of clear anti-corruption policies and practices, and communicate them at all levels of the organization and to stakeholders to ensure effective implementation.

1. Oversee the establishment of mechanisms and processes for control to prevent, monitor, and evaluate corruption risks, and regularly report operational results to the Board of Directors.

2. Provide training and knowledge about anti-corruption policies and practices, and support activities that promote and instill compliance with laws and regulations among all employees.

Practice 6.5

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Oversee the establishment of mechanisms and processes for handling complaints and taking action in cases of whistleblowing, including instances of rights violations.

1. Oversee the establishment of mechanisms and processes (recording, tracking progress, problem-solving, reporting) for stakeholder complaints, and ensure convenient and multiple channels for receiving complaints, including disclosing complaint channels on the website or in the annual report.
2. Ensure clear policies and guidelines are in place for whistleblowing, by establishing channels for reporting through the company's website or through assigned independent directors/audit committee members, as well as having processes for verifying information, taking action, and reporting to the Board of Directors.
3. Ensure appropriate protection measures are in place for whistleblowers who report with good faith.

Principle 7: Maintaining Financial Credibility and Information Disclosure

Guideline 7.1

Responsible for ensuring that the financial reporting system and the disclosure of important information are accurate, sufficient, timely, and in accordance with relevant rules, standards, and practices.

1. Ensure that personnel involved in the preparation and disclosure of information possess appropriate knowledge, skills, and experience for their responsibilities and are sufficient in number. Such personnel include the head of accounting and finance, accountants, internal auditors, company secretary, and investor relations officers.
2. Consider relevant factors when approving information disclosure, especially in the case of financial reports, at least the following factors must be considered:
 - a. Assess the adequacy of the internal control system.
 - b. Auditor's opinion in the financial statements and auditor's observations regarding the internal control system, including auditor's observations through other communication channels (if any).
 - c. Opinion of the Audit Committee.
 - d. Consistency with the company's objectives, main goals, strategies, and policies.
3. Ensure that information disclosure, including financial statements, Form 56-1 and the Annual Report, adequately reflects the financial position and operating results, and support the company in preparing Management's Discussion and Analysis (MD&A) to accompany quarterly financial statement disclosures.

Guideline 7.2

Monitor and oversee the adequacy of financial liquidity and the ability to repay debt.

1. Ensure that management monitors and assesses the company's financial status and reports to the Board of Directors regularly. The Board and management must jointly find solutions promptly if there are signs indicating problems with financial liquidity and the ability to repay debt.

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2. When approving any transaction or proposing an opinion for shareholder approval, the Board of Directors should ensure that the transaction will not affect the continuity of business operations, financial liquidity, or ability to repay debt.

Guideline 7.3

In situations where the company faces financial problems or is likely to face problems, the Board of Directors must ensure that the company has a problem-solving plan and other mechanisms to resolve financial issues while considering the rights of stakeholders.

1. Closely monitor and ensure that management conducts business with prudence and complies with information disclosure requirements in cases where the company is likely to be unable to repay its debts due to financial problems.

2. Ensure that management establishes a financial problem-solving plan, considering fairness to stakeholders, and reports on its status regularly.

Guideline 7.4

Consider preparing a sustainability report as appropriate, disclosing information on legal compliance, ethical conduct, anti-corruption policies, treatment of employees and stakeholders, including fair treatment and respect for human rights, as well as social and environmental responsibility, taking into account nationally or internationally accepted reporting frameworks, and ensuring that the disclosed information is material and reflects practices that will lead to the creation of sustainable value for the enterprise.

Guideline 7.5

Overseeing that management has a department or person responsible for investor relations, whose duty is to communicate with shareholders and other stakeholders such as investors and analysts, and to establish communication policies, information disclosure, and oversight of the use of inside information and trading of company securities, to ensure that communication and information disclosure to stakeholders are appropriate, equitable, and timely.

Guideline 7.6

Promote the use of information technology for disseminating information according to specified criteria and through the channels of the Stock Exchange of Thailand, including the disclosure of information in both Thai and English through other channels, such as the company's website, on a regular basis, and presenting up-to-date information.

Principle 8: Support Shareholder Participation and Communication

Guideline 8.1

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Ensure that shareholders participate in important company decisions.

1. Ensure that important matters, including issues stipulated by law and issues that may affect the company's operational direction, are considered and/or approved by shareholders.
2. Support shareholder participation, such as:
 - a. Establishing criteria for minority shareholders to propose additional agenda items in advance of the shareholder meeting. The Board of Directors will consider including the proposed items as agenda items. If the Board of Directors rejects an item proposed by shareholders for inclusion, the Board must inform the shareholder meeting of the reasons.
 - b. Establish criteria for minority shareholders to nominate individuals for directorships and ensure that such criteria are disclosed to shareholders in advance.
3. Ensure that the notice of the shareholder meeting contains accurate, complete, and sufficient information for shareholders to exercise their rights.
4. Ensure that the notice of the shareholder meeting and related documents are sent to shareholders no less than 21 days before the meeting date and published on the company's website at least 30 days before the meeting date.
5. Provide opportunities for shareholders to submit questions in advance of the meeting, by establishing guidelines for submitting advance questions and publishing these guidelines on the company's website.
6. The notice of the shareholder meeting and related documents shall be prepared in English in their entirety and published along with the Thai version.

Guideline 8.2

Ensure that the proceedings of the shareholder meeting are orderly, transparent, efficient, and facilitate shareholders in exercising their rights.

1. Determine the date, time, and venue of the meeting, taking into account the convenience of shareholders attending the meeting.
2. Ensure that no actions are taken to restrict opportunities for attending the meeting or to impose undue burdens on shareholders.
3. Promote the use of technology in shareholder meetings, including shareholder registration, vote counting, and result display, to ensure that meeting proceedings are fast, accurate, and precise.
4. The Chairman of the Board shall preside over the shareholder meeting and is responsible for ensuring that the meeting complies with relevant laws, regulations, and the company's articles of association, allocating appropriate time for each agenda item specified in the notice of meeting, and providing opportunities for shareholders to express opinions and ask questions to the meeting regarding company-related matters.

(Translation)

5. Do not support the addition of agenda items without prior notice, especially important items that require shareholders to study information before making a decision.
6. All directors and relevant executives must attend the meeting so that shareholders can ask relevant questions.
7. Before the shareholder meeting, the number and proportion of shareholders attending in person and by proxy, the meeting procedures, voting methods, and vote counting will be announced.
8. In cases where there are multiple agenda items, the Chairman of the meeting shall arrange for separate voting on each item, for example, shareholders exercising their right to appoint directors individually for the director appointment agenda.
9. Encourage the use of voting cards for important agenda items and promote the appointment of independent persons to count or verify votes at the meeting and disclose the results of votes for, against, and abstentions for each agenda item to the meeting, and record them in the minutes of the meeting.

Guideline 8.3

Ensure that the disclosure of meeting resolutions and the preparation of shareholder meeting minutes are accurate and complete.

1. Ensure that the company discloses the resolutions of the shareholder meeting along with the voting results within the next business day through the news system of the Stock Exchange of Thailand and on the company's website.
 2. Submit copies of the shareholder meeting minutes through the Stock Exchange of Thailand's system within 14 days from the date of the shareholder meeting.
 3. Ensure that the minutes of the shareholder meeting record at least the following information:
 - a. Names of directors and executives attending the meeting, the proportion of directors attending and not attending the meeting.
 - b. Voting and vote counting methods, meeting resolutions, voting results (approve, disapprove, abstain, void ballot).
 - c. Questions and answers during the meeting, including the names of the questioner and the respondent.
- This policy shall be reviewed regularly, at least once a year, or when there are changes in circumstances.

Business Ethics and Code of Conduct

Business Principles

The Board of Directors of Premier Tank Corporation Public Company Limited has a policy to promote good corporate governance in line with the company's vision to conduct business with integrity, ethics, and responsibility towards stakeholders, society, and the environment, by striving to develop the business to compete effectively and grow sustainably.

(Translation)

Premier Tank Corporation Public Company Limited adheres to the principles of honesty, fairness, and transparency, while also considering the interests of shareholders and all stakeholders. Therefore, the "Business Ethics and Code of Conduct Manual" has been prepared to serve as a guideline for all directors, executives, and employees to operate professionally and within the framework of laws and good governance principles.

Premier Tank Corporation Public Company Limited mandates continuous review and monitoring of compliance with the aforementioned manual to maintain the organization's ethical standards and build confidence among investors, society, and relevant parties, leading to stable and sustainable long-term growth.

Definitions and Terms

"Business Ethics" means desirable practices or good guidelines established to be upheld as standards in business operations to achieve the vision and reflect the organization's values/culture.

"Stakeholders" means individuals or groups involved in various aspects of the company's business operations, including shareholders, employees, customers, business partners, society, and communities, etc.

"Conflict of Interest" means any activity or situation where personal interests or those of related parties may influence the performance of duties and affect the company's best interests.

"Persons who may have a conflict of interest" means "Persons who may have a conflict of interest" refers to the following individuals.

1. Company executives.
2. Major shareholders of the company.
3. Persons with control over the company.
4. Individuals related by blood, marriage, or legal registration to persons under 1, 2, or 3, including parents, spouses, siblings, children, or spouses of children.
5. Any legal entity in which persons under 1, 2, or 3 are shareholders, or have significant direct or indirect control or other interests.

"Inside Information" means material facts affecting the price of securities that have not yet been disclosed to the public, such as joint ventures, mergers, announcements of dividend payments or non-payments, or announcements of profits or losses, etc.

"Insider Trading" means any person using their position or being in a position to know material facts of the company that are material to the change in the price of securities, and then buying or selling securities based on such facts before they are equally disclosed to the public, which is considered taking advantage of others and unfair trading.

"Corruption" means acting or refraining from acting in one's official capacity, or abusing power, to seek undue benefits in various forms, whether it be giving or receiving bribes, offering, promising to give,

(Translation)

requesting, or demanding money, assets, or any other inappropriate benefits from government officials, government agencies, private entities, or any other person doing business with the company, to induce such person to act or refrain from acting in their duties, thereby obtaining business or facilitating any other inappropriate business advantage, unless permitted by law, regulations, announcements, rules, local customs, or trade practices.

Code of Conduct for Business Operations

Premier Tank Corporation Public Company Limited and its subsidiaries ("the Company") are committed to conducting business in accordance with ethical principles, managing with transparency and accountability, being responsible towards society and the environment, and treating all stakeholders equitably and fairly, in line with good corporate governance policies, for stable and sustainable growth.

To establish a concrete standard for the company's business operations, a business code of conduct has been established as a written document, to serve as a good practice guideline for all directors, executives, and employees of the company in conducting business to a standard within the framework of ethics, morality, integrity, and respect for human rights. The company requires directors, executives, and employees at all levels to prioritize and adhere to their assigned duties with responsibility, treating all stakeholder groups equitably and fairly, to ensure business operations achieve the organization's vision, create long-term value, and foster continuous and sustainable growth.

Respecting and complying with relevant laws, regulations, and requirements.

1. Directors, executives, and employees of the company must comply with the laws, regulations, rules, and requirements of the Stock Exchange of Thailand and the Securities and Exchange Commission.
2. Directors, executives, and employees of the company must comply with relevant domestic and/or international laws and regulations.
3. Directors, executives, and employees of the company must comply with the company's good corporate governance policy and business ethics.
4. Directors and executives are required to review compliance with laws, regulations, and company rules, as well as promote and support consistent adherence.
5. Subsidiaries or business representatives of the company over which the company has control, including the company's business partners, must agree to comply with the company's business ethics.

Policy on the Preservation and Use of Company Assets

Premier Tank Corporation Public Company Limited recognizes the importance of using company assets, which are resources provided by the company for its business operations. Executives, employees, and relevant parties are responsible for utilizing company assets to their full potential, controlling, supervising,

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and maintaining assets with the care of a prudent person, and not using company assets for their own benefit or the benefit of others, unless authorized by the approving authority.

Company assets refer to tangible and intangible assets, both income-generating and non-income-generating, which have value and a useful life of more than 1 year, such as movable and immovable property, including technology, academic knowledge, proprietary information, rights, copyrights, patents, concessions, inventions, and intellectual property, etc.

The company has announced a policy on the use of computers and information technology as a guideline, which covers the security of the company's information technology system databases, the inspection and assessment of information technology risks, the management of organizational assets, and the response to information system security incidents, etc.

Policy on Preventing and Overseeing the Use of Company Inside Information for Personal Gain

Use of Inside Information

As the company has diverse stakeholders and interested parties, it must operate with equality and fairness towards all. To prevent illegal actions, personnel at all levels of the company, as well as all relevant individuals who have or may have access to undisclosed inside information, should avoid trading the company's securities if they are a director or executive of that company. However, if trading the company's securities, it should be done with caution, without using inside information that has not yet been disclosed to the stock exchange. After trading, such securities transactions should be reported, adhering to the regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission.

Preventive Measures

The company has policies and procedures for overseeing the use of the company's inside information for personal gain, as follows:

1. Provide knowledge to directors and various departmental executives regarding their duty to report their holdings of securities or derivatives contracts, as well as those of persons related to directors and executives, to the Securities and Exchange Commission and the Stock Exchange of Thailand, in accordance with Section 59 and the penalties stipulated in Section 275 of the Securities and Exchange Act B.E. 2535. Persons related to directors and executives, as defined by the Securities and Exchange Commission Notification No. Sor Jor 38/2561, are as follows :

- 1.1 Spouses or cohabitants as husband and wife

- 1.2 Minor children

(Translation)

1.3 A legal entity in which oneself, the person under (1), and the person under (2) collectively hold more than 30% of the total voting rights of such legal entity, and such collective shareholding constitutes the largest proportion in that legal entity.

1. Directors, executives, including management-level positions in accounting or finance at the level of department manager or equivalent, are required to prepare and submit the following reports to the company secretary before submitting them to the Securities and Exchange Commission each time.

2.1 Report on one's own securities holdings in the company, securities holdings of spouses and minor children, including legal entities in which such persons collectively hold more than 30% of the total voting rights and have the largest proportion of shareholding in such legal entity. Such reports must be prepared and submitted within 7 business days from the date of purchase, sale, transfer, or receipt of transfer of securities or derivatives contracts, and after the company has notified the names of directors and executives according to the methods prescribed by the Securities and Exchange Commission.

2.2 Report on changes in one's own securities holdings in the company, changes in securities holdings of spouses and minor children. Such reports must be prepared and submitted within 3 business days from the date of purchase, sale, transfer, or receipt of transfer of securities or derivatives contracts, and after the company has notified the names of directors and executives according to the methods prescribed by the Securities and Exchange Commission.

1. Directors, executives, employees, and staff of the company who have access to material inside information that affects the change in securities prices are prohibited from using such inside information to buy, sell, transfer, or receive transfer of securities or derivatives contracts issued by the company before such information is widely disseminated to the general public, especially during the 30 days prior to the release of the company's financial statements or information affecting securities prices. Furthermore, after the information has been disseminated, such individuals are prohibited from buying, selling, transferring, or receiving transfer of securities or derivatives contracts issued by the company until the public who has received such information has had a reasonable time to evaluate the information (at least 24 hours from the date and time of dissemination). Those involved with inside information must not disclose it to others until it has been reported to the Stock Exchange.

2. Directors, executives, company employees, and individuals involved with inside information are prohibited from disclosing or transmitting inside information or company secrets to unrelated persons, including family members, relatives, friends, etc.

3. The company prioritizes preventing the use of inside information for undue personal gain, to diminish the company's benefits, or to create conflicts of interest. This is stipulated in the corporate governance policy, code of conduct and work practices, employment contracts, and work regulations.

(Translation)

4. The company places importance on maintaining the confidentiality of customer information and does not use such information for the benefit of directors, executives, employees, and related parties, unless it is information required to be disclosed by law.
5. Information disclosure must be carried out by executives or company employees authorized to disclose it. General employees who are not authorized to disclose information, when asked to disclose information they are not authorized to, should advise the inquirer to contact the person responsible for disclosing that information to ensure accuracy and consistency of information.
6. Do not provide advice or guidance on trading the company's securities, unless it is related to job duties assigned by the company.
7. The company places importance on maintaining the security of data in information systems by controlling and/or preventing unauthorized access to company data from external parties, and by defining data access rights for employees at various levels according to their authority and responsibilities.
8. In cases where external parties are involved in ad-hoc work concerning information not yet disclosed to the public and currently under negotiation, which falls under the category of retaining inside information that may affect the movement of the company's securities prices, such individuals must enter into a Confidentiality Agreement until the information is disclosed to the Stock Exchange and the SEC.

Penalties

The company imposes disciplinary penalties for violations involving the use of inside information for personal gain, ranging from written warnings, wage deductions, temporary unpaid suspension, to termination of employment. The penalty will be determined based on the intent of the act and the severity of the offense.

Code of Conduct towards Stakeholders

1. Guidelines for Dealing with Shareholders

The company encourages shareholders to exercise their fundamental rights and is committed to conducting business for continuous and sustainable growth to generate appropriate returns for shareholders, with the following guidelines:

- 1.1 Perform duties with honesty, integrity, and transparency, and treat all shareholders fairly and equally.
- 1.2 Provide an opportunity for shareholders who are unable to attend the meeting in person to appoint an independent director or another person as their proxy to attend and cast votes on their behalf.
- 1.3 Provide opportunities for shareholders to propose matters for inclusion in the meeting agenda and to nominate individuals for election as company directors at the shareholders' meeting in advance, according to the criteria set by the company.

(Translation)

1.4 The company will not impose additional meeting burdens without unnecessary prior notification to shareholders.

1.5 The Board of Directors provides opportunities for shareholders to exercise their right to appoint directors individually and supports the use of ballot papers for transparency and verifiability.

1.6 The Board of Directors has established measures to prevent insider trading by relevant individuals, including company directors, executives, employees, and staff, as well as their spouses and minor children who are involved with such information, to ensure fairness among shareholders. Penalties for disclosing company information have also been stipulated.

1.7 Report the financial status, including the company's future trends, to shareholders equally, consistently, and completely, based on facts.

2. Guidelines for Dealing with Customers

2.1 Treat customers fairly regarding products and services.

2.2 Disclose information about products and promotions accurately and completely.

2.3 Maintain the confidentiality of customer information and data.

2.4 Provide knowledge to customers to develop products and services.

2.5 Provide channels for customers to complain about products and services by adhering to the company's complaint handling policy.

3. Guidelines for Dealing with Business Partners and Creditors

3.1 Do not solicit, accept, or agree to accept, nor offer or agree to offer any dishonest benefits to business partners or creditors, and comply with terms and conditions appropriately and fairly.

3.2 Commercial negotiations with business partners or creditors must not be exploitative and must be transparent.

3.3 Procurement, purchasing, or hiring from related parties must adhere to principles of equality, transparency, and fairness for the company's maximum benefit, and must be conducted according to company regulations with verifiable information disclosed. Avoid procurement, purchasing, or hiring that conflicts with the company's overall interests.

3.4 Those involved in procurement and purchasing activities must not accept direct or indirect benefits from business partners and must remain neutral, without close relationships that could affect decision-making.

3.5 Strictly adhere to agreed-upon terms or conditions; if obstacles arise that prevent compliance, business partners or creditors must be informed to jointly consider the most appropriate solution.

3.6 If any circumstances arise that prevent the fulfillment of an agreement or contract, the responsible person must immediately report to their supervisor.

3.7 Provide accurate and factual information about the company to business partners or creditors.

(Translation)

3.8 Focus on maintaining sustainable relationships with business partners and contractors who have clear objectives regarding product quality and mutual trust.

3.9 Treat creditors consistently by strictly adhering to the key terms of all creditors to ensure transactions are correct, fair, and transparent.

4. Guidelines for Dealing with Trade Competitors

4.1 Conduct business and compete within the framework of laws and good competition rules.

4.2 Do not seek confidential information of trade competitors through dishonest or inappropriate means.

4.3 Do not attempt to damage the reputation of trade competitors through malicious accusations without factual information.

5. Guidelines for Dealing with the Government Sector

5.1 Act with integrity when engaging in transactions with government officials or agencies.

5.2 Avoid transactions with government officials or their family members while such officials have influence over decisions regarding contracts or transactions between the company and the government sector.

5.3 Building good relationships between the government sector and the company should be conducted within appropriate limits.

6. Guidelines for Dealing with Employees

6.1 Comply with labor laws and various regulations related to employees, prioritize fundamental human rights, promote respect for rights and freedoms through non-discrimination, respect employees' opinions, and allow freedom of expression without interference.

6.2 Provide fair remuneration and benefits appropriate to the duties, based on the quality of work completion, attitude, and potential of employees.

6.3 Appointments, transfers, as well as rewards and punishments for employees, must be carried out with fairness and integrity, based on their knowledge, abilities, suitability, and their actions or performance.

6.4 Always create and maintain a safe working environment and operational procedures that protect employees' lives and property. Focus on operating in compliance with laws and safety standards, with regular monitoring and evaluation.

6.5 Prioritize and promote the development of employees' knowledge and abilities by providing them with comprehensive and consistent opportunities.

6.6 Avoid any unfair actions that could threaten or create mental pressure on employees.

(Translation)

- 6.7 Provide channels for receiving feedback and suggestions based on employees' professional expertise.
- 6.8 Manage by avoiding any unfair actions that could affect employees' job security.
- 6.9 Ensure employees understand and are reminded of their ethics and roles, which they can practice to promote ethical behavior across all parties.
- 6.10 Treat employees with courtesy and respect for their individuality and human dignity.
- 6.11 Provide opportunities for employees to report or complain about illegal actions by the company or about corruption.
- 6.12 Ensure employees' welfare and benefits at work.
- 6.13 Remind employees to be aware of utilizing the company's limited resources to their maximum benefit.

7. Guidelines for Dealing with the Community, Society, and Environment

- 7.1 Promote knowledge and raise awareness among employees at all levels regarding socially responsible practices, the conservation of natural resources and the environment, as well as the valuable and efficient use of energy and various resources.
- 7.2 Conduct business based on principles of human rights respect, equality, and non-discrimination.
- 7.3 Do not engage in any actions that promote or cooperate with customers who conduct illegal business or pose a threat to society and the nation.
- 7.4 Provide communication channels to listen to the opinions and needs of the community to ensure prompt response and resolution in cases where the company's operations impact the environment and community.
- 7.5 Support public benefit activities, considering appropriateness and the sustainable benefits that society and communities should receive.
- 7.6 The company prioritizes strengthening communities by promoting education to build an educational foundation for the nation's youth in the future.
- 7.7 Continuously develop environmental management systems to reduce the impact of climate change, such as reusing usable materials and equipment, integrating technology into various company operations, resulting in reduced resource consumption and unnecessary waste, to control and prevent pollution, and campaigning for and promoting the use of environmentally friendly materials, equipment, and products.

Anti-Corruption Policy and Guidelines

(Translation)

"Directors, executives, and employees of the company are prohibited from supporting or accepting any form of corruption for direct or indirect benefit to themselves, their families, friends, and acquaintances, whether they are recipients, givers, or offerors of bribes, monetary or non-monetary, to individuals, government officials, government agencies, or private entities with whom the company conducts business or interacts. This includes the business of subsidiaries, associated companies, or other companies over which the company has control, under any circumstances. Strict adherence to anti-corruption measures is required, including establishing a responsible structure and systems for risk management, internal control, and internal audit to prevent and suppress corruption within the organization, as well as reviewing guidelines and operational requirements to align with business changes, regulations, and legal requirements."

Policy Scope

This Anti-Corruption Policy and Guidelines cover the operations of the company and its subsidiaries, and companies under its control. It applies to the Board of Directors, executives, and employees at all levels, including authorized representatives acting or operating on behalf of the company, over which the company has control. Furthermore, it aims for business partners or individuals involved in the company's business to support the implementation of this policy. These policies and guidelines have been established to provide guidance on what should be practiced or to identify who can provide consultation in case of doubt. Company personnel are obligated to maintain the highest standards in business operations. Non-compliance with this policy is considered a serious disciplinary offense, a breach of contract, and a criminal offense for the individual, and may cause severe damage to the company's reputation and status.

The company has established guidelines, measures, and responsibilities for those in charge, as well as regularly reviewing and revising the implementation of this anti-corruption policy to align with business changes, regulations, and legal requirements.

Anti-Corruption Guidelines

1. Directors, executives, and employees at all levels must comply with the anti-corruption policy and business ethics, relevant policies and guidelines, as well as laws related to anti-corruption. They must not be involved in any acts that constitute corruption, whether directly or indirectly, for the benefit of themselves and/or related parties.
2. All employees must not neglect or ignore any acts that constitute corruption or bribery involving the company and its subsidiaries. They must report such acts to their supervisor or through the channels specified in the company's whistleblowing and complaint policy, and cooperate in verifying facts. If there are any doubts or questions, they should consult their supervisor or the designated responsible person.
3. The company will provide fairness and protection to employees who refuse or report corruption related to the company. The company has clearly defined measures to protect whistleblowers and complainants,

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and will not blame, take any unfair action to demote, punish, or negatively impact employees who refuse corruption, even if such actions result in the company losing business opportunities.

4. Directors, executives, and employees at all levels who engage in corruption are considered to have violated the company's code of conduct and will be subject to disciplinary action as stipulated by company regulations. Furthermore, they may face legal penalties if their actions are unlawful.

5. Anti-corruption measures are an integral part of business operations and are the responsibility of the Board of Directors, executives, supervisors, all employees at every level, suppliers, and subcontractors, who shall contribute their opinions on practices to ensure that anti-corruption efforts achieve the stated policy objectives.

6. Develop an anti-corruption system in line with relevant laws, establish appropriate and sufficient internal control systems, including conducting risk assessments for activities related to or susceptible to corruption, and define clear measures and guidelines for employees and relevant parties.

7. Foster a culture of anti-corruption, raise awareness of honest and transparent operations, provide communication and training to build knowledge and understanding among employees, communicate and build understanding to support anti-corruption efforts with business partners, customers, and stakeholders, as well as disclose information to the public.

8. The company promotes communication through multiple channels to provide employees and stakeholders with convenient and secure means to report concerns or suspicions. The company assures that whistleblowers will have their rights protected, will not be punished, unfairly transferred, or harassed in any way. Furthermore, responsible persons are appointed to investigate and follow up on all reported cases transparently and fairly.

9. The company provides anti-corruption training to the Board of Directors, executives, and employees at all levels to foster integrity, accountability in performing duties, and raise awareness of the company's commitment to transparent business operations.

10. The company provides mechanisms for accurate, transparent, and verifiable financial reporting, and emphasizes disseminating knowledge and building understanding among personnel involved in operations or actions that may affect the company, to ensure that all parties act correctly according to established standards.

Guidelines for Charitable Donations and Sponsorships

To ensure that charitable donations are transparent and solely for charitable purposes, without any expectation of benefits or other forms of reciprocation that could be considered corruption, and that sponsorships are transparently provided to support projects without any expectation of benefits or other

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forms of reciprocation that could be considered corruption, the company has established guidelines for charitable donations and sponsorships to be adhered to, in accordance with the "Anti-Corruption Policy and Related Guidelines."

Guidelines for Political Contributions

The company maintains a policy of political neutrality, not favoring any political group, and does not provide financial support, assets, rights, or any other benefits as direct or indirect political assistance to any politicians, political parties, or their representatives for the company's benefit, except for supporting democratic processes as permitted by law. The company encourages employees at all levels to exercise their political rights in accordance with the law as good citizens, and to adhere to the "Anti-Corruption Policy and Related Guidelines."

Guidelines on Giving or Receiving Gifts, Hospitality, and Entertainment Services

To ensure that giving or receiving gifts, hospitality, and entertainment services are conducted transparently and are not intended to gain benefits or any other form of reciprocation that could be considered corruption, and to maintain consistent standards, the company has established guidelines for giving or receiving gifts, hospitality, and entertainment services.

For guidelines on anti-corruption practices, please adhere to the "Anti-Corruption Policy and Related Guidelines."

Guidelines on Facilitation Payments

Facilitation Payment refers to unofficial payments made to government officials, exceeding the legally prescribed rate (if any), even if small, to induce officials to expedite actions or to ensure that certain actions are taken as part of their existing duties, such as applying for licenses, certificates, and receiving public services.

The company has no policy to pay facilitation payments to government officials under any circumstances.

Guidelines on Conflict of Interest

Conflict of Interest refers to any action that creates a personal interest or conflict of interest with the company, whether arising from oneself or related parties, or from using opportunities or information gained from one's position to seek personal gain or engage in business that competes with the company, etc.

(Translation)

Directors, executives, and personnel of the company must avoid actions that create a conflict of interest with the company. Any actions involving individuals who may have a conflict of interest must be reasonable, based on acting in the company's best interest, not contrary to laws and regulations, and in accordance with the conflict of interest prevention policy. If an event falls under the category of a potential conflict of interest transaction, a written report must be submitted to the hierarchical supervisor and forwarded to the Company Secretary for submission to the Audit Committee to consider the appropriateness of entering into such a transaction.

Guidelines on Hiring Government Officials

Revolving Door refers to individuals who are or have been government officials joining the company, and who may use their relationships or inside information to benefit the company or create a conflict of interest between the performance of duties by government agencies or business regulatory bodies and the company, potentially leading to unfair business advantages.

The company has no policy to hire government officials to work in the organization under any circumstances.

Guidelines on Procurement

The company's procurement operations must be transparent, honest, comply with the company's procurement policies and regulations, and adhere to laws and regulations related to both public and private sector procurement.

Policy on Non-Infringement of Intellectual Property and Copyright

The company has established non-infringement of intellectual property or rights as a key policy, which all directors, executives, and employees must strictly adhere to. The Information Management Department is tasked with monitoring to prevent infringement of rights in computer software.

1. Employees must not disclose company information and secrets, such as data derived from ideas, knowledge, and various techniques related to business operations. In all cases, this is considered the company's intellectual property. Disclosure is prohibited without written permission from the company or an authorized representative.
2. Employees are responsible for protecting and ensuring that the company's information systems under their possession or responsibility are not improperly accessed by unauthorized persons, and for not disclosing business-critical information to unrelated parties.

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3. Employees must exercise discipline in using the company's information systems and communication devices to avoid negative impacts on the company and others, such as being used as a tool for unauthorized access to information systems, damaging reputation and assets, disrupting or interfering with the operation of information systems, or using them for non-business purposes or illegal activities.
4. Employees must not infringe on software rights or the intellectual property of others by using properly licensed computer programs.
5. Employees must not infringe on company data or the personal data of others, unless authorized by the data owner.
6. Employees must keep their passwords confidential and must not access unfamiliar websites, websites without data security systems, or websites that may be harmful to the company's computer systems.
7. In cases where an employee requests permission for an associate or a contractor's employee to use the company's information system, the requesting employee must control the usage by the associate or contractor's employee and shall be responsible for any damages incurred.
8. If there is suspicion that any employee is using the information technology and communication systems inappropriately, or if there is a reasonable cause to protect the security of the company's information technology and communication systems, the assigned department will inspect, search, monitor, investigate, and control that employee's use of information technology and communication.
9. If any employee is found to have infringed intellectual property or misused information technology and communication, and a fair investigation reveals actual wrongdoing, disciplinary and/or legal penalties will be considered as appropriate for each case.
10. Employees are responsible for reporting to their supervisor any acts they believe constitute infringement or acts that may lead to disputes regarding intellectual property.
11. The use of any works, data, or resources that are the rights of third parties within the company must be verified to ensure that such use does not infringe on the intellectual property rights or any other rights of third parties, and must strictly comply with relevant laws, regulations, and requirements.

Use and Maintenance of Information Technology System Security

The company places importance on the appropriate and secure use of electronic data, information technology systems, networks, and computers to ensure continuous company operations. Systems must be used in compliance with regulations, computer crime laws, and to prevent threats that may cause damage to the company. All employees must adhere to policies and regulations, and are responsible for protecting against unauthorized access or dissemination, by acting as follows:

1. Stipulate the use of electronic devices and electronic data for the benefit of the company.
2. Do not use any information technology to access inappropriate websites, and avoid accessing illegal or immoral information, as well as not disseminating internet information or news to others.
3. Do not use for personal business gain or for other benefits related to politics or cronyism.

(Translation)

4. Employees must not unlawfully access computer systems that have specific access prevention measures, and where such measures are not intended for them.
5. Employees must not access or gain knowledge of computer system access prevention measures specifically created by others without authorization, and must not disclose or misuse such measures, which may cause damage to the company or other individuals.
6. It is prohibited to unlawfully intercept, by any electronic means, data of others being transmitted in a computer system, where such computer data is not intended for public benefit.
7. It is prohibited to send computer data or electronic mail to others by concealing or falsifying the source of such data transmission, which disturbs the normal use of computers by others.
8. It is prohibited to commit any act that may cause damage to computer data or electronic systems related to national security, public safety, or to act against computer data intended for public benefit.
9. The company reserves the right to inspect the use of electronic devices, information systems, and electronic data provided by the company for employees' work, without prior permission from the user. Such inspections will be conducted strictly within the framework of laws, data security policies, and company regulations.

Anti-Money Laundering

The company adheres to and complies with principles, laws, and regulations related to anti-money laundering, stipulating that executives and employees at all levels are prohibited from receiving, transferring, converting assets, or supporting any actions related to the unlawful acquisition of assets, to prevent the company from being used as a channel or tool for transferring, concealing, or disguising the origin of illegal assets.

Guidelines for Practice

1. Before conducting transactions with counterparties, verify and confirm the source of funds to ensure they were legally obtained.
2. Do not accept unusual money transfers, especially those originating from countries or jurisdictions unrelated to the transaction.
3. If suspicious or unusual transactions are found, they must be reported to the supervisor immediately for consideration and action according to company procedures.

Code of Conduct for Company Directors

Company directors are individuals entrusted by shareholders and appointed by the shareholders' meeting to oversee and control the management's operations in accordance with assigned policies, and in compliance with the company's articles of association, regulations, and laws related to the company's business, with the following guidelines:

(Translation)

1. Perform duties with caution, prudence, honesty, integrity, and fairness for the utmost benefit of the company, customers, shareholders, and employees.
2. Should perform duties in accordance with the company's rules, regulations, objectives, and articles of association, resolutions of the Board of Directors, and resolutions of the shareholders' meeting.
3. Perform duties honestly in the company's business affairs, independently from management and interested parties, and without personal interests influencing business decisions.
4. Should protect the interests of shareholders and treat stakeholders fairly.
5. Should perform duties to the best of one's ability and not hold positions in other businesses that operate in the same type of business or are competitive in nature.
6. Do not disclose confidential customer information and company operations, whether intentionally or unintentionally, to external parties, unless with the company's consent and as part of a director's legitimate duties.
7. Directors should not use their position to seek personal gain from businesses dealing with the company, including those currently in contact to conduct business with the company.
8. Disclose benefits from personal businesses or other businesses, including any matters that constitute a conflict of interest.

Executive Code of Conduct

1. Perform duties with caution, prudence, honesty, integrity, and fairness for the utmost benefit of the company, customers, shareholders, and employees.
2. Strictly adhere to laws and company rules and regulations.
3. Disclose the true status of the company to directors and shareholders completely and in a timely manner.
4. Do not seek personal gain or benefit for related parties from one's position and confidential company information.
5. Do not disclose confidential company information.
6. In cases where information or news is to be provided, or interviews are to be given to the media or the public, authorization from the company must be obtained.
7. Do not engage in business that competes with the company.
8. Inter-company transactions must be considered and approved, taking into account the company's best interests and in compliance with the law.
9. Do not undertake any actions that may create a conflict of interest for the company.
10. Conduct oneself within the framework of good morals and traditions.
11. Dedicate one's knowledge and abilities to the benefit of the company at all times.
12. Govern subordinates with compassion, empathy, and guidance, without misusing authority.
13. Adhere to the code of conduct by behaving and conducting oneself as a good and trustworthy example to subordinates.

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14. Maintain a positive attitude towards the company and subordinates.
15. Provide knowledge and advice to subordinates, and willingly and sincerely listen to their opinions and suggestions.
16. Promote subordinates' stability and advancement in their careers and personal well-being.
17. Compete with others or other organizations under established rules and regulations, without criticizing or slandering others.
18. Conduct oneself appropriately as a representative of the organization to external parties.
19. Strictly perform duties in accordance with policies or requirements regarding the scope of social conduct set by the organization.
20. Participate in various social activities and community organizations, providing cooperation and assistance commensurate with one's status and appropriate opportunities.
21. Do not cooperate with or support any activities that are detrimental to good morals or promote vices.
22. Respect the rights and opinions of employees.

Employee Code of Conduct

1. Maintain a positive attitude towards the company and supervisors, and show respect and obedience to supervisors.
2. Perform duties with honesty, integrity, virtue, perseverance, and diligence, continuously developing one's knowledge.
3. Strictly perform duties in accordance with laws and company regulations.
4. Perform duties with knowledge, competence, efficiency, and to the standards expected of the position, with diligence and responsibility.
5. Acknowledge, understand, and perform duties in accordance with company policies.
6. Conduct oneself appropriately as a company employee in terms of demeanor, manners, comportment, and dress to build credibility for oneself and the company.
7. Protect one's own reputation and the good reputation of the company by not slandering or providing information that could damage the company.
8. Protect the company's interests by not engaging in any actions that cause the company to lose benefits, not misappropriating company benefits, and not acting for personal gain or the gain of others.
9. Protect company assets and be responsible for using company assets to their maximum benefit, ensuring that company assets are not damaged.
10. Maintain company confidentiality. Do not disclose company information or news that should not yet be disclosed, and do not provide any news or information without authorization from the commanding authority.

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11. Obey lawful orders from supervisors, and do not commit any acts that violate regulations or any acts that indicate dishonest intent.
12. Cooperate and collaborate to successfully complete work, providing useful advice and assistance to colleagues in their duties.
13. Do not accept gifts of value exceeding what is normally exchanged between supervisors and subordinates, regardless of the occasion.
14. Do not conduct business using the company's name, or have an interest in businesses related to the company, or falsely claim the company's reputation in one's own business or that of others, whether directly or indirectly.
15. Should not engage, either directly or indirectly, in businesses that compete with the company or conflict with the company's interests.
16. Respect each other, treat fellow employees with good hospitality, sincerity, and unity within the team, providing mutual support in appropriate ways beneficial to the company's work, and transfer work experience to colleagues and subordinates in due course.

Investor Relations Code of Conduct

1. Disclose necessary information and news accurately, clearly, timely, and fairly to all parties, taking care to avoid misunderstanding or misinterpretation.
2. Provide opportunities for all relevant groups to access and inquire about information.
3. Promptly address questions or concerns from shareholders, investors, analysts, and stakeholders.
4. Perform duties by prioritizing the interests of shareholders and stakeholders.
5. Maintain confidentiality, do not disclose, and do not use the company's internal information that has not yet been disclosed to the public for personal gain or for the undue benefit of others.
6. Perform duties with full knowledge and ability, and with professionalism.
7. Be knowledgeable about company information and continuously seek knowledge to improve work efficiency.
8. Build confidence, enhance the company's image and positive attitude, and foster good relationships with all parties.
9. Refrain from disclosing information regarding operating results during the 1-month period prior to the release of quarterly and annual financial statements, which includes not arranging meetings or answering any inquiries related to operating results for shareholders, investors, securities analysts, and the media.

Whistleblowing and Complaint Reporting Policy and Measures

The company provides measures for reporting tips or complaints regarding violations of laws, business ethics, or behavior that may indicate corruption by directors, executives, or employees within the

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organization. Various communication channels are provided to allow employees and stakeholders to conveniently and appropriately submit tips or complaints to the company. Whistleblowers or complainants must specify the details of the matter to be reported, along with their name, address, and contact telephone number, and submit it through the designated channels for receiving reports.

Channels for reporting tips or complaints about corruption

The company has established channels for reporting incidents or tips when company personnel or external parties have doubts about actions that constitute a violation or non-compliance with various company policies, regulations, and orders, through the following channels:

1. Suggestion and complaint box within the company
2. Direct reporting of tips and complaints to
 - o Trusted supervisors at all levels
 - o Human Resources Department
 - o Company Secretary
 - o Audit Committee
 - o Board of Directors
3. Email
 - o Chairman of the Audit Committee: whistle_blowing@premiertankcorp.com
 - o Internal Audit Department: internal_audit@premiertankcorp.com
 - o Company Secretary: company_secretary@premiertankcorp.com
4. Via the company's website www.premiertankcorp.com
5. By mail: Directly to the Chairman of the Board or the Chairman of the Audit Committee

Premier Tank Corporation Public Company Limited
2034/69 ItalThai Tower, 15th Floor, New Petchburi Road
Kwang Bang Kapi, Khet Huai Khwang, Bangkok 10310

For guidelines regarding reporting tips and complaints, including measures for protection and confidentiality, as well as investigation procedures and penalties, please adhere to the “Anti-Corruption Policy and Related Guidelines.”

Supervision or monitoring of compliance with business ethics

The company mandates that it is the duty and responsibility of all executive directors and employees to acknowledge, understand, and strictly adhere to the established business ethics and work practices. Executives within the organization must supervise and consider it a critical matter to ensure that employees under their supervision are aware of, understand, and seriously comply with the prescribed ethics.

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To ensure that the company's business ethics remain current and in compliance with laws, regulations, operational procedures, and the ever-changing environment, the Board of Directors mandates a review of the business ethics at least once a year or whenever there are significant changes.

Anti-Corruption Policy and Related Guidelines

Message from the Chairman of the Board

Premier Tank Corruption Public Company Limited and its subsidiaries ("the Company") are committed to conducting business with honesty, integrity, transparency, and fairness, in accordance with good corporate governance principles. The Company does not seek personal gain that conflicts with its interests, considers its social responsibility to all stakeholders, and emphasizes compliance with legal requirements related to anti-corruption. To contribute to the nation's progress free from corruption, the Company has joined the Thai Private Sector Collective Action Against Corruption (CAC) to express its intention and commitment to not supporting corruption in any form, whether direct or indirect.

The company has established an "Anti-Corruption Policy and Guidelines" to ensure that directors, executives, employees at all levels, including subsidiaries, associates, and other companies under the company's control, can systematically implement measures and guidelines. This ensures correct and consistent operations. The company has defined anti-corruption measures through a corruption risk assessment process involving all departments, enabling appropriate response measures to be established. Furthermore, the company is committed to fostering an organizational culture that opposes corruption and encourages partners and customers to join the Thai Private Sector Collective Action Against Corruption (CAC) to enhance clean business standards.

The Board of Directors, executives, and employees at all levels of the company and its subsidiaries are committed to conducting business with honesty, integrity, and transparency, and to not engaging in corruption in any form, whether direct or indirect. Corruption is illegal, and the company has zero tolerance for it. This Anti-Corruption Policy and Guidelines serve as an addition to the Business Ethics and Corporate Governance Policy, and were approved by the resolution of the Board of Directors' Meeting No. 3/2568 on August 14, 2568.

Definitions

Fraud Refers to intentional acts to seek undue benefits for oneself or others (e.g., family members, relatives, friends, close associates, etc.). Fraud can be divided into three types: corruption, embezzlement of assets, and reporting fraud.

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1. Corruption Refers to the misuse of authority to perform any act to obtain undue benefits for the organization, oneself, and/or others. Corruption includes giving and/or receiving bribes, demanding benefits or intimidation, providing benefits, and conflicts of interest, whether with government officials or between private entities, unless permitted by law, regulations, announcements, rules, local customs, or trade practices.
2. Embezzlement of assets Refers to any act that leads to the unlawful possession of company assets or causes the company to lose assets, opportunities, or any benefits, with the intention of gaining benefits for oneself and others, covering both cash and non-cash assets.
3. Reporting fraud Refers to the alteration or amendment of various reports, whether financial, such as financial statements, financial records, or non-financial reports, to conceal embezzlement or inappropriate actions, or to gain benefits for oneself and/or others, resulting in the company's reports being inaccurate. Bribe refers to assets, gifts, or other benefits given to a person to induce them to act or refrain from acting as desired by the briber. Receiving or giving a bribe refers to offering, promising, or agreeing to receive or give money, assets, goods, gifts, rewards, or any other form of compensation to induce that person to make a decision, act, or refrain from acting in any way, or to gain benefits for oneself, or to help achieve one's desired outcome, dishonestly, unlawfully, or in violation of the company's ethics.

The Company Refers to Premier Tank Corporation Public Company Limited and its controlled subsidiaries. Company personnel Refers to directors, executives, and employees at all levels of Premier Tank Corporation Public Company Limited and its subsidiaries or controlled companies.

Business partners Refers to companies, partnerships, vendors, merchants, or parties involved in the company's business.

Government agencies Refers to ministries, bureaus, departments, or other government agencies with the status of a department, regional administration, local administration, and state enterprises established by royal acts or royal decrees, and also includes other state agencies designated as state agencies by royal decree.

Private entities Refers to agencies or organizations not affiliated with or partnered with the state.

Government employees/officials Refers to political office holders, civil servants or local government employees with permanent positions or salaries, employees or individuals working in state enterprises or government agencies, local administrators, and local council members who are not political office holders, officials under the law on local administration, and also includes directors, sub-committee members, clients of government agencies, state enterprises, or government agencies, and individuals or groups of individuals

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who exercise or are assigned to exercise state administrative power in carrying out any action according to law, whether established within the civil service system, state enterprises, or other state affairs.

Political support or political assistance Refers to the provision of money, assets, rights, or other benefits to assist, support, or facilitate any political party, politician, election candidate, or person with a political role, as well as supporting political activities, whether directly or indirectly.

Conflict of interest Refers to a situation or action where an employee has excessive personal interest that affects their decision-making or performance of duties in their responsible position, impacting the public interest. For example, an employee making decisions or performing duties in their position that generate benefits for themselves or their associates rather than the public interest. Such actions may occur consciously or unconsciously, intentionally or unintentionally, exhibiting diverse behaviors that may become common practice without being perceived as wrongdoing, leading to a lack of impartial decision-making due to prioritizing personal interests.

Giving and receiving gifts Refers to giving or receiving anything of value that an individual or company gives to another individual/company without direct expectation of reciprocation. Gifts may be money, goods, or other forms of benefits.

Giving and receiving hospitality Refers to expenses for business hospitality, such as food and beverage hospitality, travel expenses, accommodation, and other expenses directly related to business operations or customary trade practices.

Giving and receiving hospitality services Refers to participating in social or cultural events with officials or individuals who have, or may have, or who may facilitate business relationships with the company.

Giving and receiving support Refers to giving/receiving money paid with the objective of promoting the company's business, brand, or reputation, which carries risks and is used as a channel for publicizing the company's business operations.

Goods or other benefits

Charitable donations Refers to giving/receiving resources such as money, goods, assets, or other benefits to an organization to support charitable activities, such as for religion, education, public welfare, etc., without expecting commercial returns.

Customary practices Refers to festivals or important occasions where gifts may be given, and also includes opportunities for congratulations, expressions of gratitude, welcoming, expressions of sympathy, or providing assistance as customary in society.

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<9RuVL02clsfx_espace> which the company receives from other companies or organizations for the public benefit of the company without expecting any compensation or other benefits from the company or other organizations from which the company received the donation.

Giving and receiving support Refers to money, goods, or any other form of benefit reasonably paid to or received from customers, business partners, and business associates, with the objective of promoting the company's business, brand, or reputation, benefiting the creation of commercial credibility, strengthening business relationships, and being appropriate for the occasion.

Facilitation payments Refers to small payments made informally to government officials, solely to ensure that government officials follow procedures or to expedite processes, where such processes do not require the discretion of the government official and are within the official's duties, as well as being rights that legal entities are entitled to by law, such as applying for licenses, requesting certificates, and receiving public services, etc.

Anti-Corruption Policy

Premier Tank Corporation Public Company Limited and its subsidiaries

"Directors, executives, and employees of the company are prohibited from supporting or accepting any form of corruption for direct or indirect benefit to themselves, their families, friends, or acquaintances, whether they are recipients, givers, or offerors of bribes, monetary or non-monetary, to individuals, government officials, government agencies, or private entities with whom the company conducts business or interacts. This includes the business of subsidiaries, associated companies, or other companies over which the company has control in any case. They must strictly adhere to anti-corruption measures, including establishing a responsible structure and systems for risk management, internal control, and internal audit to prevent and suppress fraud or corruption within the organization, as well as reviewing practices and operational requirements to align with changes in business, regulations, and legal requirements."

Introduction

Premier Tank Corporation Public Company Limited and its subsidiaries are committed to conducting business with integrity, transparency, and fairness in accordance with good corporate governance principles. To prevent and combat corruption, the "Anti-Corruption Policy and Guidelines" have been established to

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ensure that personnel of the company and its subsidiaries understand and use them as clear operational guidelines.

Objectives

To ensure that the company has appropriate and sufficient internal control systems for anti-corruption, clear guidelines and measures are established to prevent, detect, and respond appropriately to business needs. This is to ensure that directors, executives, and employees comply with the anti-corruption policy, in line with the goal of conducting business completely free from corruption. Corruption is illegal, and the company cannot tolerate its occurrence.

Policy Scope

This Anti-Corruption Policy and Guidelines cover the operations of the company, its subsidiaries, and controlled companies. It applies to the Board of Directors, executives, and employees at all levels, including authorized representatives acting on behalf of the company, over whom the company has control. Furthermore, it is expected that business partners or individuals involved in the company's operations will support the implementation of this policy. These policies and guidelines have been established to provide guidance on expected conduct or to identify who to consult in case of doubt. Company personnel are obligated to maintain the highest standards in conducting business. Non-compliance with this policy is considered a serious disciplinary offense, a breach of contract, and a criminal offense for the individual, and may cause severe damage to the company's reputation and status.

The company has established practices, measures, and responsibilities for those in charge, as well as regularly reviewing and revising compliance with this anti-corruption policy to align with changes in business, regulations, and legal requirements.

Anti-Corruption Guidelines

1. Directors, executives, and employees at all levels must comply with the anti-corruption policy, business ethics, and all related policies and guidelines, as well as relevant anti-corruption laws. They must not be involved in any direct or indirect acts of fraud or corruption for their own benefit and/or the benefit of related parties.
2. All employees must not neglect or ignore any acts of fraud or corruption related to the company and its subsidiaries. They must report such acts to their supervisor or through the channels specified in the company's whistleblower and complaint policy, and cooperate in factual investigations. If there are any doubts or questions, they should consult with their supervisor or the designated responsible person.
3. The company will provide fairness and protection to employees who refuse or report corruption related to the company. The company has clearly established measures to protect whistleblowers and complainants. The company will not blame, take any unfair action, demote, punish, or negatively impact employees who refuse corruption, even if such actions result in the company losing business opportunities.

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4. Directors, executives, and employees at all levels who engage in corruption are considered to have violated the company's code of conduct and will be subject to disciplinary action according to the company's established regulations. Furthermore, they may face legal penalties if their actions are unlawful.

5. Anti-corruption measures are an integral part of business operations and are the responsibility of the Board of Directors, executives, supervisors, all employees at every level, suppliers, and subcontractors, who are expected to contribute their opinions on practices to ensure that anti-corruption efforts achieve the stated policy objectives.

6. Develop an anti-corruption system in compliance with relevant laws, establish appropriate and sufficient internal control systems, including conducting risk assessments for activities involved or susceptible to corruption, and define clear measures and guidelines for employees and relevant parties.

7. To foster a culture of anti-corruption, raise awareness of operating with integrity and transparency, and provide communication and training to build knowledge and understanding among employees within the organization. Communication and understanding support for anti-corruption efforts will be extended to business partners, customers, and stakeholders, as well as public disclosure of information.

Roles and Responsibilities

Board of Directors

Has the responsibility to formulate policies and support effective and efficient anti-corruption efforts, in accordance with good corporate governance principles, to ensure that employees are aware of and prioritize anti-corruption, and to instill it as an organizational culture.

Audit Committee

Have the responsibility to provide opinions and review financial and accounting reports, internal control systems, and risk management systems, including reviewing internal controls for the implementation of anti-corruption measures and related policies, to ensure that the company's operations are robust, sufficient, appropriate, and efficient, in accordance with generally accepted standards. This also includes receiving complaints, whistleblowing on corrupt practices, processing complaints according to established procedures, presenting complaints to the Board of Directors for joint consideration of penalties or problem resolution, and reporting complaints to the Board of Directors.

Risk Management, Corporate Governance, and Sustainability Committee

Considers and screens the company's overall risk management policies and guidelines, covering various significant types of risks such as financial risk, investment risk, operational risk, sustainability risk, and corruption risk, among others. It also considers and approves the formulation of operational plans and appropriate measures for organizational risks, as well as overseeing that risks are maintained at an acceptable level.

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Chief Executive Officer, Executives, and Employees

Have the responsibility to formulate various measures in accordance with the anti-corruption policy for implementation, communication, and monitoring of employee compliance, as well as to review the suitability of measures to align with regulations, rules, and legal requirements. Executives are responsible for overseeing and monitoring the implementation of anti-corruption measures in each department, participating in the assessment and review of corruption risks in each department, and recommending measures to consistently improve operations.

Employees are responsible for studying, understanding, and complying with policies and guidelines for preventing and combating corruption, the business code of conduct, and related policies. They must not neglect or ignore any acts that constitute corruption involving the company and its subsidiaries. When an act that may violate the policy is observed, it must be reported through the channels designated by the company.

Internal Audit Department

Have the responsibility to audit and review operations to ensure they are correct and consistent with policies, guidelines, approval authorities, operational procedures, company regulations, and relevant laws, to ensure that appropriate and sufficient internal control systems are in place, and to report to the Audit Committee quarterly.

Anti-Corruption Operations

To ensure clarity in anti-corruption operations, the company has established measures and guidelines for employees of the company and its subsidiaries to implement, fostering a common understanding. These must be carried out with caution, transparency, in accordance with the law, and good corporate governance principles, as follows:

1. Anti-Corruption Preventive Measures

Important measures that help the company prevent corruption within the organization include assessing corruption risks appropriate to the business model, considering changing environmental factors, developing anti-corruption policies, and designing operational guidelines based on sound internal control principles suitable for potential risks. These are considered preventive measures to reduce corruption risks. Furthermore, fostering awareness and an organizational culture against corruption among employees can help prevent corruption within the organization. The company has established the following anti-corruption preventive measures:

1.1 Risk Management

Risk assessment is the foundation of anti-corruption measures. Therefore, the company must understand its business processes and assess potential corruption risks to manage them to an acceptable level. The company mandates corruption risk management, starting with risk assessment planning, defining objectives,

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assigning duties and responsibilities to relevant personnel, and clearly documenting risk assessment criteria, referencing the "Corruption Risk Management Handbook." Internal and external factors and opportunities for risk are considered to cover potential risks to the company, along with measures to mitigate risks if current internal control measures are insufficient. The company requires regular assessment and review of corruption risks to ensure that risks are identified and managed promptly.

1.2 Policies and Guidelines Related to Anti-Corruption

Employees of the company and its subsidiaries must perform their duties with caution, transparency, and in accordance with legal requirements. To ensure clarity in handling matters with a high risk of various forms of corruption, the following policies and guidelines are established:

1.2.1 Policy and Guidelines on Political Support or Assistance

"The company maintains a policy of political neutrality, not aligning with any political group, and does not provide financial support, assets, rights, or any other benefits, whether directly or indirectly, to politicians or political parties, or their representatives, for the company's benefit, unless it is support for democratic processes permitted by law. The company encourages employees at all levels to exercise their political rights in accordance with the law as good citizens."

Guidelines

- The company respects the political rights and freedoms of its personnel under the provisions of the Constitution, relevant laws, and regulations. Employees may exercise their political rights in accordance with the law as good citizens. However, employees should avoid expressing political opinions in the workplace.
- The company does not provide financial support, assets, rights, or any other benefits, whether directly or indirectly, to politicians or political parties, or their representatives, for the company's benefit in obtaining contracts or facilitating business advantages, unless it is support for democratic processes permitted by law.
- Company personnel shall not express themselves in any way that leads others to believe the company is involved with, biased towards, or supports political activities. They shall not participate in any type of political activity or provide political support, whether direct or indirect, which could potentially lead to internal conflicts, cause damage, and harm the company's reputation in all cases.

1.2.2 Policy and Guidelines on Conflict of Interest

"The company has established a conflict of interest policy to prevent conflicts of interest, considering it a business ethic. Directors, executives, and employees are prohibited from using their positions as directors, executives, or employees of the company to seek personal gain, whether directly or indirectly. Directors are prohibited from engaging in businesses that compete with the company. They must avoid related party transactions that may create a conflict of interest with the company. If such transactions are necessary, the Board of Directors shall ensure that they are transparent, fair, and conducted as if with an independent third party. Directors or employees with an interest in such transactions are prohibited from participating in the approval process." In cases classified as related party transactions under the announcements of the Capital Market Supervisory Board and the Stock Exchange of Thailand, the Board of Directors oversees strict

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compliance with the criteria, methods, and disclosure requirements for related party transactions of listed companies. The Board of Directors has established the following conflict of interest policy and procedures as guidelines for directors, executives, and employees:

Guidelines

- The company must not provide loans or guarantees to directors or to businesses in which directors hold more than 50% of the shares, unless it is part of the company's welfare benefits.
- Directors must not engage in businesses that compete with the company, unless approved by the shareholders' meeting before their appointment as directors.
- Directors and executives must not use company opportunities or information to benefit themselves or others, including engaging in businesses that compete with the company or related businesses.
- Directors and executives must not participate in meetings or abstain from voting on matters related to themselves that may create a conflict of interest with the company. If such transactions are necessary for the company's benefit, they must be conducted on an arm's length basis, as if with an independent third party.
- Directors must inform the company of their interests in any contracts entered into by the company.
- Directors and executives must prepare a conflict of interest disclosure report annually or when an event occurs.
- Transactions such as buying or selling assets, etc., between directors and the company must be reported to and approved by the Board of Directors beforehand.
- The consideration of conflict of interest matters and transactions that may involve conflicts of interest must always include independent directors in the meeting and deliberation.
- Directors, executives, and company personnel who have access to inside information should avoid using such information for their personal benefit or disclosing it for the undue benefit of others.

1.2.3 Policy and Guidelines on Facilitation Payments

"The company has established a policy on facilitation payments, whereby directors, executives, employees, and workers of the company must not make facilitation payments to government officials under any circumstances, as there is a high risk that such payments could become bribes, increase business costs, damage reputation, and violate this anti-corruption policy."

Guidelines

Company personnel are prohibited from making facilitation payments, whether directly or indirectly, and regardless of whether such payments are customary or made through third parties, especially facilitation payments to government officials. Avoid or close off opportunities that could lead to situations requiring facilitation payments.

1.2.4 Policy and Guidelines on Hiring Government Officials

"The company has established a policy for hiring government officials to serve as directors, executives, employees, and workers of the company or as company consultants. There must be a selection process, approval of employment, determination of remuneration, and control processes to ensure that the hiring of government officials is not a quid pro quo for any benefits, does not facilitate advantages for the

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company, and does not damage the company's reputation for credibility and integrity in performing duties, which carries a risk of corruption."

Guidelines

- The selection, approval of employment, and determination of remuneration for hiring government officials for positions at the department manager level and below must be considered for necessity by the Chief Executive Officer before proceeding with the hiring of such government officials.
- The selection, approval of employment, and determination of remuneration for hiring government officials to serve as directors, advisors, and senior executives must be carefully and thoroughly considered by the Nomination and Remuneration Committee and proposed for approval to the Board of Directors.
- In cases where an individual who is a former high-ranking government official is hired, that individual must have had a hiatus from being a high-ranking government official for at least 2 years, unless there are government regulations or requirements that permit otherwise.
- The company will not hire government employees if such hiring provides undue benefits to the company or involves reciprocal benefits. Information on the hiring of government employees must be disclosed in the company's annual report to ensure transparency.

1.2.5 Policy and Guidelines on Giving and Receiving Donations

The company has established a policy for charitable donations. Must be for public charity purposes and conducted solely in the company's name. Donations, whether in the form of cash, goods, assets, or other benefits, must be genuinely used to support communities, society, or public benefit activities as specified, with complete and transparent supporting documentation, and must not influence business decisions or be used as an excuse for giving or receiving bribes to seek undue benefits in any case.

For receiving donations. The company has no policy to accept donations from any external individuals or entities.

Guidelines

- **Credibility of the recipient of the donation.**

Donations must be made to credible entities, such as foundations, public organizations, temples, hospitals, educational institutions, or social organizations that possess certifications or whose credibility can be verified. There must be evidence demonstrating genuine charitable activities that benefit society according to the specified objectives.

- **No reciprocal benefits.**

Donations must not involve reciprocal benefits for any specific individual, entity, or group, except for general business recognition that does not influence business decisions.

- **Limitations on Government Support**

The company has no policy to support political activities in any case and does not provide support to any political party or politician in the company's name.

- **Donations in "cash" form**

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Monetary donations must be processed solely through the e-Donation system. The recipient must be an entity registered in the e-Donation system with the Revenue Department to ensure that donations are transparent, verifiable, and comply with legal criteria.

- **Donation Approval**

A written expense approval request must be prepared, clearly stating the objective, recipient organization, amount, and payment method. This must be submitted to the authorized approver in accordance with the company's "Approval and Operation Authority" policy.

- **Preparation of supporting documents for donations.**

- The requesting department must prepare a memorandum requesting approval, specifying activity details, objectives, and amount, along with supporting documents for consideration.
- After the donation, the requesting department must collect evidence, including thank-you letters, merit certificates, receipts, e-Donation receipts, and donation photos, and submit the originals to the Accounting and Finance Department for verification and accounting records.

- **Inspection and Penalties for Non-Compliance**

- The Accounting and Finance Department is responsible for verifying the completeness of evidence. If insufficient, the requesting party must be notified to provide additional information.
- The Internal Audit Department will conduct annual audits of the donation process to assess the efficiency, effectiveness, and appropriateness of internal controls.
- If it is found that a donation does not comply with the guidelines or shows signs of corrupt behavior, the company will impose the maximum penalties.

1.2.6 Policy and Guidelines on Giving and Receiving Support

Providing support differs from charitable donations because support aims to benefit the company's brand or reputation, serving as a channel for publicizing the business operations of the company and its subsidiaries.

Therefore, the company has established a policy for giving and receiving support, adhering to the key principle that it must align with the company's objectives and operational policies. This involves a transparent consideration process, clear and verifiable procedures, absence of conflicts of interest, and must not be used as an excuse for bribery or as a channel for seeking undue benefits.

Guidelines

- **Legitimacy and transparency of support**

- The giving or receiving of support must be demonstrable as directly related to the approved project.
- Must have clear objectives, such as enhancing corporate image, brand promotion, or CSR activities through supporting initiatives that create value for the community, environment, and society as a whole, to generate sustainable positive impact and genuinely reflect the organization's social responsibility.
- Providing support in the form of trade discounts or rebates must solely be for sales promotion and business public relations activities, and must be issued as a credit note, used as a discount for future purchases, or as a check payable to the customer only.

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- Support for domestic and international study tours must aim to provide clients with business insights that can be used to improve operations.
- Support must not be used as an excuse to provide benefits to directors, executives, employees, or any individuals/entities that could lead to corruption.
- **Prohibited from giving or receiving benefits contrary to the law.**
 - Prohibited from giving, soliciting, or promising to give financial support or any other benefits to government officials, both domestic and foreign, including officials of international organizations.
 - The purpose of the support must not be to induce officials to act, omit, or delay actions contrary to their duties or the law.
 - Internal control measures must be strictly adhered to, to prevent company personnel from using support as a channel for seeking undue benefits.
- **Approval of Support**
 - A written approval request must be prepared, specifying the objective, the supporting/receiving entity, project details, and evidence of the request for support from the requesting entity, including the amount of money or items for support. This must be submitted to the authorized approver in accordance with the company's "Approval and Operation Authority" policy.
- **Preparation of documents and evidence for giving and receiving support.**
 - The requesting department must prepare a memorandum specifying project details, names of supporting and receiving entities, objectives, proof of identity for the applicant/supporter, photographs of business promotion activities, brand logos (if any), and attach supporting documents from the organization requesting support for consideration.
 - The requesting department must collect evidence of support provided, such as thank-you letters, receipts for in-kind donations, activity photos, etc., and submit the originals to the Accounting and Finance Department for verification and accounting records.
- **Inspection and Penalties for Non-Compliance**
 - The Accounting and Finance Department is responsible for verifying the completeness of evidence. If insufficient, the requesting party must be notified to provide additional information or explanations.
 - The Internal Audit Department will conduct annual audits of the financial support process to assess the efficiency, effectiveness, and appropriateness of internal controls.
 - If it is proven that financial support was not provided in accordance with guidelines or was used as a channel for corruption, the company will impose the maximum penalties.

1.2.7 Policy and Guidelines for Giving and Receiving Gifts, Hospitality, and Entertainment

The company requires all directors, executives, employees, and workers to refrain from soliciting, giving, or receiving gifts, hospitality, entertainment, or any benefits that could influence business decisions or lead to dereliction of duty, including actions that could be perceived as direct or indirect bribery to individuals, government officials, government agencies, or private entities.

(Translation)

Giving and receiving gifts, hospitality, entertainment, or other benefits is permissible provided they meet the following characteristics:

1. Conducted solely in the company's name, correctly, openly, and transparently.
2. Not contrary to moral principles, in accordance with laws, and company regulations.
3. Appropriate for the situation, festivals, and customs.
4. Do not use gifts or any benefits to support actions that constitute fraud or corruption.
5. No impact on decisions related to the company's interests, or creation of conflicts between personal and organizational interests.

Guidelines

1. Receiving Gifts

1. Receiving gifts must be for a reasonable cause, not to induce decisions contrary to ethical principles or to provide undue benefits, and should be in accordance with customs and social practices, with a value not exceeding 3,000 Baht.
2. Receiving gifts with a value exceeding 3,000 Baht: If refusal or return is not possible, acceptance is permitted only in cases of necessity and where it does not affect decisions related to the company's interests. The recipient must proceed as follows:
 - The recipient must report to their supervisor using the company's prescribed form and submit it to the Chief Officer of the relevant division for approval.
 - The recipient shall deliver the gift to the Company Secretary or assigned delegate for collection and use in company activities or for charity.
 - The Company Secretary must report on the management of gifts not falling under exceptions to the Risk Management, Corporate Governance, and Sustainability Committee quarterly.
 - The Internal Audit Department will conduct annual audits of the gift-receiving process to assess efficiency and internal controls.
 - Prohibited from receiving gifts in the form of cash or cash equivalents, including checks, bonds, shares, gift vouchers, gold ornaments, or real estate.
 - If the company receives gifts, souvenirs, awards, or any items from competitions, contract signings with business partners, or inter-organizational exchanges, these may be accepted and shall be considered company assets.

2. Giving Gifts, Items, or Other Benefits

1. Giving gifts or other benefits according to custom is permissible, provided it does not violate moral principles, laws, company regulations, government agencies, state enterprises, and other relevant entities, and must not exceed 3,000 Baht per person per occasion.
2. The giving of gifts or other benefits should be standardized to prevent discrimination.
3. Do not give gifts or other benefits to spouses, children, or related parties of government officials or other stakeholders with whom contact is made, as this may constitute giving with the intent for that person to receive on behalf of another.

(Translation)

4. Giving gifts or other benefits with a value exceeding 3,000 Baht is permissible in cases of significant business occasions for the organization or entity, such as signing business contracts, founding or establishment anniversaries, customs, or any other necessary and appropriate circumstances that do not violate the law. This requires approval from the highest executive of the relevant division and must comply with the company's "Approval and Operation Authority" policy, and proceed as follows:

- The requesting department must provide gift details, such as the giving entity, quantity, value, along with supporting documents for consideration.
- Submit through the direct supervisor for screening before presenting to the authorized approver at the level specified in the company's authority matrix.
- <9iS2zZz79CPB>
- Present evidence of gift-giving to the Accounting and Finance Department, such as receipts, thank-you letters, photographs, or other supporting documents for verification.
- If evidence is incomplete, the Accounting Department will request additional information.
- The Internal Audit Department will conduct annual audits of the gift-giving process to assess the efficiency, effectiveness, and appropriateness of internal controls.
- If it is found that gift-giving does not comply with the guidelines or has hidden intentions for corruption, the company will impose the maximum penalties.

1. Hospitality and Entertainment Services

1. Hospitality or entertainment services must have clear objectives, such as meetings, business negotiations, or company visits.

2. Must not imply an exchange of business benefits, but should focus on building relationships and promoting service opportunities, such as client or partner appreciation dinners.

3. Should be held after business has been conducted. If held before business, it should only be for promoting the company's products.

4. Hospitality and entertainment services must be conducted as follows:

- Prepare a request with details: objectives, location, list of recipients, and participating company employees.
- Attach documents and request approval in accordance with the company's "Approval and Operation Authority" policy.
- Provide evidence of hospitality to the Accounting and Finance Department, such as receipts, thank-you letters, or other supporting documents for verification.
- If evidence is incomplete, the Accounting Department will request additional information.
- The Internal Audit Department conducts annual assessments for transparency and efficiency.
- If it is found that hospitality does not comply with the guidelines or has hidden intentions for corruption, the company will impose the maximum penalties.

4. Reporting and Document Retention for Giving and Receiving Gifts, Hospitality, and Entertainment

(Translation)

1. Information Reporting: All parties must inform the Company Secretary of the names of their assigned delegates, and the delegates must proceed as follows:

- Compile and summarize information on the giving and receiving of gifts, banquets, receptions, and entertainment services by the department.
- Prepare a monthly report on the last business day of the month.
- Submit the report through the Company Secretary to the Chief Executive Officer by the 10th of the following month.
- Retain copies of reports as evidence, including approval documents, lists of givers/receivers, and reports, for internal audit inspection.

2. Document retention: Documents must be retained for a period of no less than 2 years from the date of creation.

1.2.8 Policies and Guidelines for Subsidiaries, Business Representatives, and Partners

“The company places the highest importance on conducting business transparently, accountably, and based on law and good ethics. Therefore, the company requires all subsidiaries, affiliates, business representatives, and partners to strictly adhere to the company's anti-corruption policy. The company does not tolerate giving bribes, receiving bribes, or any actions that constitute corruption, whether directly or indirectly, including not allowing any third party to act as an agent for any illegal activities to gain business benefits or provide undue advantages to the organization. All subsidiaries, business representatives, and partners are required to adhere to the same standards as the parent company.”

Guidelines

1. Dealing with Subsidiaries and Affiliates

- All subsidiaries must strictly adhere to the parent company's anti-corruption policy and must implement it within their own organizations, ensuring all levels of the company are aware.
- Subsidiary executives must sign an Annual Declaration of Compliance form every year.
- Provide training to employees of subsidiaries and affiliates on preventing bribery, corruption, and conflicts of interest at least once a year.
- An annual Corruption Risk Assessment must be conducted, and the report submitted to the parent company for review and follow-up.
- If a subsidiary discovers behavior that constitutes bribery or corruption, it must report to the parent company within 3 business days.

1. **Dealing with Business Representatives**

- All business representatives must sign an Anti-Bribery Agreement before commencing work.
- Business representatives must report expenses related to business activities for transparency verification and must comply with the spending limits and approval procedures set by the company.
- Business representatives are prohibited from giving gifts, cash, or any other benefits to third parties in exchange for business advantages.

(Translation)

o If a business representative is found to be involved in corruption, the company has the right to immediately terminate the contract and blacklist them to prohibit future engagement.

3) Dealing with Partners, Suppliers, and Contractors (Third Parties & Contractors)

- All partners or contractors must sign a certification of compliance with the anti-corruption policy before commencing business.
- A Third-Party Risk Assessment must be conducted every time before selection, based on the following considerations:
 - Ethical history and records regarding corruption
 - Connection with government officials or authorities.
 - Disclosure of Conflict of Interest (COI)
 - The internal audit department or external auditors have the right to randomly inspect partner documents and transactions at least once a year to prevent business risks.
 - If a partner is found to be engaging in corrupt practices, the company has the right to
 - Immediate contract termination.
 - Suspend related payments.
 - Inform regulatory authorities as per law.
 - Blacklist to prohibit future engagement.

4) Key Prohibitions

- Employees of the company, its subsidiaries, business representatives, and partners are prohibited from giving or receiving cash, gifts, or any benefits intended to facilitate business advantages.
- Third parties are prohibited from acting as intermediaries to offer bribes on behalf of the company.
- Prohibited from entering into any agreements that create a conflict of interest.
- If any suspicion of bribery or corruption is found, it must be reported immediately through the company's whistleblowing channels.

5) Monitoring and Enforcement

- The CAC Working Group reviews compliance with this policy at least twice a year and reports the results to the Audit Committee.
- The Internal Audit Department conducts audits of subsidiary and partner transactions at least once a year.
- The company prepares a Transparency Report for subsidiaries and partners at least once a year.
- If a policy violation is found, the company has the right to take disciplinary action, terminate the contract, and notify regulatory authorities if legal matters are involved. A memorandum requesting approval must be prepared in the key payment system, specifying gift details, the name of the entity to receive the gift, quantity, price, or value of the gift, along with supporting documents for consideration. This must be submitted to the authorized approver for approval in accordance with the spending limits and approval authority specified in the company's approval authority matrix.
- Approvers should review approval requests, considering the appropriate purpose, occasion, and value before granting approval.

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- The applicant for approval must present evidence of gift-giving to the Accounting and Finance Department, including receipts, thank-you letters, and other supporting documents, to the officials for retention as evidence for auditing.

1.3 Operations Related to Anti-Corruption

1.3.1 Background Checks of Personnel and Business Stakeholders

Background checks of personnel and business partners are crucial factors for effective anti-corruption measures. The company assigns the Human Resources Department to conduct background checks on personnel before employment or promotion, and the department or individuals responsible for procurement, sourcing, and hiring to conduct background checks on other individuals who will conduct business transactions with the company before commencing contracts or inter-party transactions. These checks can be performed as appropriate under relevant laws and with the consent of the personnel or business partners, as follows:

Background checks of personnel before employment. To verify the qualifications and experience of job applicants as appropriate, as well as information regarding past corruption of individuals applying for positions at the company.

Background check of personnel before assigning them to key positions within the company. To verify qualifications, experience, financial credibility, references, or potential conflicts of interest arising from the new position.

Background checks of other individuals who will conduct business transactions with the company, especially sellers, contractors, and service providers to the company. To verify the credibility, financial status, reputation, and qualifications related to goods or services, as well as to review information regarding past corruption of other individuals who will conduct business transactions with the company. Additionally, the Board of Directors and executives, as defined in the announcements of the Capital Market Supervisory Board, must report their interests using the prescribed form to the Company Secretary annually and whenever there are changes.

1.3.2 Procurement, Sourcing, and Hiring

In the company's procurement, sourcing, and hiring processes, procedures are established for consideration and submission to line managers for approval. The purpose of the procurement/hiring should be specified, and approval must be in accordance with the company's operational authority. High-value procurement/hiring should involve price comparisons from other sellers/service providers. Additionally, evaluations will be conducted to select sellers, service providers, and contractors in accordance with procurement regulations, and practices will be transparent and fair to all parties.

The company has no policy to solicit or accept, offer or provide financial benefits or any other benefits to sellers or service providers in order to receive assets or materials that are substandard or do not match purchase orders, or to receive services that are of poor quality or do not meet agreements. In the event of such incidents, the supervisor must be immediately informed, and a joint solution sought, including considering not accepting or delaying acceptance if it would cause damage to the company or the

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contracting party. The company will inform sellers, service providers, and contractors of this anti-corruption policy and measures.

The company reserves the right to cancel procurement and hiring if it is found that sellers, service providers, including contractors, engage in corruption or bribery.

1.3.3 Human Resource Management

The company has established human resource management guidelines to demonstrate its commitment to promoting honest, transparent, and corruption-free business operations among its personnel, in line with good corporate governance principles, as follows:

- The company has human resource management processes covering recruitment, personnel selection, promotion, training, employee performance evaluation, and compensation. The company will not solicit or accept any benefits or remuneration in any form from job applicants, individuals involved in the application process, or employees. Employees who agree to work for the company must express their intent to accept and cooperate in preventing and combating corruption by signing the company's ethical agreement.
- For personnel recruitment, the company will plan its human resources in alignment with its business plan and organizational growth. For departments requiring additional personnel, the company will recruit both internal and external candidates based on the qualifications required by the department. Additionally, there are procedures for criminal background checks and corruption checks for personnel before they assume their positions.
- Regarding performance evaluation, the company has clear performance evaluation procedures to ensure that company personnel possess sufficient and appropriate operational skills. For career advancement and promotions, the company has established written conditions and qualifications to ensure clarity and transparency.
- Regarding compensation and welfare benefits, the company has established clear principles and procedures to ensure employees understand their rights and benefits.
- The company provides continuous training to the Board of Directors, executives, and employees, including orientation for new directors, executives, and employees, to ensure a genuine understanding of anti-corruption policies and guidelines, the company's expectations, and awareness of penalties for non-compliance.
- The company has human resource management processes that ensure fairness and protect employees who refuse or report corruption related to the company. Employees will not be demoted, punished, or negatively affected, even if such actions result in the company losing business opportunities. The company provides reliable whistleblowing channels and protection mechanisms for reporters when employees wish to report information or tips and seek advice on complying with anti-corruption measures.

1.3.4 Training and Communication

Communication and training are essential in anti-corruption measures to build knowledge, understanding, and awareness of the importance of complying with relevant policies, guidelines, and work procedures.

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The company informs and supports its subsidiaries, associates, and other controlled entities in implementing anti-corruption guidelines, including communicating and disclosing anti-corruption policies and guidelines both internally and externally to directors, executives, employees, shareholders, customers, partners, all stakeholder groups, business representatives, and the general public. This is disseminated through various channels, such as annual reports, the company's website, email notifications to all employees, annual training for personnel, orientation for new employees, or other appropriate methods. Proactive communication is also maintained, including sending letters requesting cooperation in adhering to the business code of conduct and anti-corruption policy to customers and partners annually. Additionally, messages promoting anti-corruption in all forms are added to documents such as quotations and purchase requisitions.

1.3.5 Audit and Internal Control

The internal control system comprises organization-wide controls, which are operational processes jointly established by the Board of Directors, executives, and company personnel to provide reasonable assurance that methods or actions...

Performing duties as prescribed will help the company achieve its objectives. Therefore, internal control is considered the company's primary tool for preventing corruption in the operational processes of all departments. The company has established written standard operating procedures or key operational processes, emphasizing clear segregation of duties in assigning personnel responsibilities for carrying out operational steps or processes, to ensure transparent, independent operations that can help prevent or detect corruption risks. Furthermore, management in each department should regularly review operational steps or processes, or when there are significant changes affecting operations, to ensure that current operational steps or processes align with good internal control principles.

The company designates the Internal Audit Department to assess the adequacy, appropriateness, efficiency, and effectiveness of the organization's internal control system, and to provide recommendations and solutions for improving/developing internal controls to be efficient and effective, capable of preventing and detecting potential risks, especially corruption risks. This includes establishing an internal audit plan and conducting audits to ensure that the company has sufficient and appropriate internal control systems, as well as discussing audit results with the management of the audited units to understand and find suitable and practical ways to improve and develop internal controls, and regularly reporting audit results to the Audit Committee. Each unit's management is responsible for implementing the recommendations for improvement and development as suggested by the Internal Audit Department.

1.3.6 Accounting Audit and Data Retention

The company has processes for reviewing accounting entries and ensuring appropriate approval before recording entries into the accounting system. These reviews will be conducted in accordance with company policies, official regulations, relevant laws, contracts or agreements, and must comply with appropriate accounting standards and policies.

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Operating expenses and capital expenditures must be properly and completely documented and approved according to the spending limits by the authorized approvers specified in the company's approval authority matrix.

Financial reports must be prepared accurately, truthfully, reliably, and must disclose material information completely and correctly, including intercompany transaction data.

The company has adequate and secure controls for storing accounting documents for immediate inspection. There are controls over access to accounting data and secure storage of backup files.

1.3.7 Monitoring and Review

2. Corruption Detection Measures

Good anti-corruption preventive measures can help reduce the likelihood of corruption to a certain extent. However, the company must also establish corruption detection measures to help promptly detect and report potential corrupt acts. Therefore, the company has established reliable and independent channels for reporting corruption tips, allowing everyone, whether company personnel or external individuals, to report. Furthermore, a whistleblower protection process is in place to protect reporters from harm or intimidation, thereby encouraging company personnel to feel confident and secure in reporting incidents or tips related to corruption.

2.1 Whistleblowing and Complaint Mechanisms

When there is doubt, belief, or good faith reason to believe that there has been dishonest or non-transparent conduct, or

There has been a violation of good practices regarding

- Company policies, procedures, regulations, requirements, or rules.
- Good Corporate Governance, Code of Conduct, and Ethics.
- Laws, official regulations

Therefore, company personnel have a duty to report incidents or tips of corruption through the channels designated by the company. The company will penalize personnel who know or have information about potential corruption but fail to inform the responsible parties. The company has measures to protect whistleblowers who report truthfully and in good faith, and will consider compensation for damages that complainants or whistleblowers may incur. However, the company will penalize those who intentionally provide false information or tips.

Whistleblowers who do not disclose their identity must provide sufficient information for fact-finding consideration, as follows:

- Name of suspected person
- Date and time of the incident
- Location of the incident
- Overall circumstances of the incident

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- Likelihood of the incident occurring.

The company has established channels for reporting incidents or tips when company personnel or external individuals have doubts about actions that violate or fail to comply with company policies, regulations, and orders, through the following channels:

- Suggestion and complaint box within the company.
- Whistleblowing and direct complaints to
 - Supervisors at all levels whom one trusts.
 - Human Resources Department
 - Company Secretary
 - Audit Committee
 - Board of Directors
 - Email
 - Chairman of the Audit Committee: whistle_blowing@premiertankcorp.com
 - Internal Audit Department: internal_audit@premiertankcorp.com
 - Company Secretary: company_secretary@premiertankcorp.com
 - On the company's website www.premiertankcorp.com
 - By mail: Directly to the Chairman of the Board or the Chairman of the Audit Committee.

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Huai Khwang District, Bangkok 10310

For all whistleblowing and complaint channels, the Company Secretary will be responsible for coordinating the receipt and transmission of matters, following up on investigation results, and compiling cases. In the event that the Head of Internal Audit is the subject of a complaint, the company's Audit Committee will appoint a Fact-Finding Committee (Investigation Committee) to perform duties as appropriate.

In cases where the company has additional channels for reporting incidents or tips, the Company Secretary must establish the whistleblowing procedures and the operating methods for the recipients, as well as regularly review and update these procedures. Furthermore, regular training must be provided to personnel responsible for receiving incidents or tips, covering operational procedures, confidentiality, ethical practices, and other related policies.

Conditions and Consideration of Tips or Complaints

- Details of the tip or complaint must be truthful, clear, or sufficient to investigate the facts for further action.
- The information received will be treated as confidential, and the names of whistleblowers or complainants will not be disclosed to the public without their consent.
- Response time to the complainant should not exceed 3 business days after receiving the complaint.

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- The processing time for a complaint depends on the complexity of the matter, the sufficiency of documents and evidence received from the complainant, as well as documents and explanations from the accused, but shall not exceed 30 business days.

Whistleblower or Complainant Protection Mechanism

- Establish a database system to maintain the confidentiality of whistleblowers or complainants, the accused, and victims of rights violations, and define penalties for officials responsible for such data if it is disclosed.
- Access to the database system is restricted to the Chairman of the Board or the Chairman of the Audit Committee only.
- The company will disclose information only as necessary, taking into account the safety and potential harm to the whistleblower, complainant, or victim of rights violation, the source of the information, or related individuals.
- It is the duty of all supervisors or heads of departments of the accused and victims of rights violations to exercise appropriate discretion in issuing orders to protect complainants, victims of rights violations, witnesses, and individuals providing information in investigations from suffering any danger, distress, or injustice arising from complaints or rights violations, testifying, or providing information.
- The company will not take any unfair actions against whistleblowers, complainants, or victims of rights violations, whether by changing positions, job descriptions, workplaces, suspending work, intimidating, interfering with work, terminating employment, or any other actions that constitute unfair treatment towards whistleblowers, complainants, victims of rights violations, or those cooperating in corruption investigations.

2.2 Reporting Corruption

The fact-finding committee must summarize cases of corruption or misconduct, as well as resolutions, inform the complainant, and notify the Secretary of the Risk Management, Corporate Governance, and Sustainability Committee to compile corruption cases and present them to the Risk Management, Corporate Governance, and Sustainability Committee for reporting to the Audit Committee and the Board of Directors at least once a year. Immediate reporting is also required for urgent or severe cases that require prompt resolution.

All information in the report must be kept confidential and reported only to the designated authorized persons. Sharing information in any form with unrelated departments or individuals is prohibited.

3. Corruption Response Measures

The company has established corruption response measures to address the impacts of corruption and to prevent similar types of corruption from recurring. These corruption response measures include investigation, penalties and remedial actions, corruption reporting, and information disclosure, with the following guidelines:

3.1 Investigation

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When an incident or tip of corruption is reported, or when a corruption incident occurs, the Internal Audit Department and/or Human Resources Department will conduct a preliminary fact-finding investigation. If there is merit, a fact-finding committee will be appointed.

Fact-Finding Investigation

When an incident or tip of corruption is reported, the Internal Audit Department and/or Human Resources Department will conduct a fact-finding investigation. The company has measures to protect whistleblowers and related parties as follows:

1. The company will keep the information and details of whistleblowers or complainants and the accused confidential, or may disclose them only to those involved in the investigation or a limited circle of related individuals. Any disclosure of information will be carefully considered by the company, taking into account the safety and potential harm to the whistleblower or complainant, the source of the information, or related individuals.
2. The company will appoint an investigation committee to jointly consider tips and complaints with thoroughness, caution, and fairness to all parties.
3. In cases where the complainant or those cooperating in the fact-finding believe they may be unsafe or suffer distress or damage, they may request management to

Appointment of the Investigation and Fact-Finding Committee

In cases where a complaint is made against the Chief Executive Officer, the Audit Committee shall be responsible for protecting the whistleblower or complainant, witnesses, and individuals providing information in the fact-finding investigation from suffering any distress, harm, or injustice arising from reporting, complaining, testifying, or providing information. Complainants are requested to submit their complaints directly to the Audit Committee, and the Audit Committee will consider appointing an investigation and fact-finding committee to collect evidence and undertake any actions necessary to investigate the facts of the tip or complaint, as well as recommend solutions for managing the complaint.

In cases where a complaint is made against an executive from the Chief Officer level downwards, the Chief Executive Officer has the duty to exercise discretion to issue appropriate orders to protect the whistleblower or complainant, witnesses, and individuals providing information in the fact-finding investigation from suffering any distress, harm, or injustice arising from reporting, complaining, testifying, or providing information. The Chief Executive Officer is also responsible for considering the appointment of an investigation and fact-finding committee to collect evidence and undertake any actions necessary to investigate the facts of the tip or complaint, as well as recommend solutions for managing the complaint. The investigation process must be transparent and fair.

The investigation and fact-finding committee consists of representatives from three company departments or units:

1. Human Resources Department

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2. The department of the accused or complainant.
3. Other independent departments or units, such as the accounting department, etc.

However, if the company has insufficient resources or deems it appropriate to procure experts to conduct the investigation, company personnel may consider hiring qualified external individuals.

In the investigation process, the fact-finding committee must operate fairly and not disclose information to unrelated parties, and must report the investigation results to the Risk Management, Corporate Governance, and Sustainability Committee. In cases where the fact-finding committee encounters obstacles in its operations that may affect the company, the fact-finding committee must report such matters to the Risk Management, Corporate Governance, and Sustainability Committee to find timely solutions.

Furthermore, the fact-finding committee must record the investigation results and submit relevant physical and/or electronic evidence to the Human Resources Department for retention until the statute of limitations expires, to ensure that the company has sufficient evidence if it needs to be used in court.

3.2 Penalties and Remedial Measures

To demonstrate its commitment and dedication to resolving corruption issues and to clearly state the company's stance on corruption to both its personnel and stakeholders, the company has established strict and decisive penalties, as well as remedial measures for corruption, which the company must prioritize and implement promptly.

Penalties

Upon completion of the investigation, the fact-finding committee shall prepare a summary of the investigation results. In cases of tips and complaints regarding company policies, procedures, regulations, requirements, or rules, good corporate governance, code of conduct and ethics, and laws, official regulations, the Company Secretary shall proceed as follows:

1. If the accused is not guilty, or if the matter arose from a misunderstanding or appropriate advice has been given to the accused or related parties, and no penalties are imposed, the investigation committee shall summarize the findings and report them to the Chief Executive Officer. A copy shall be sent to the Secretary of the Risk Management, Corporate Governance, and Sustainability Committee to compile corruption cases and present them to the Risk Management, Corporate Governance, and Sustainability Committee and the Audit Committee (Independent Directors).
2. If the accused is found to have committed corruption or illegal acts against the company, disciplinary action shall be considered in accordance with company regulations. If such offense causes damage to the company and/or any other person, civil and criminal proceedings shall be initiated as per the resolution of the fact-finding committee, and presented to the Chief Executive Officer or assigned delegate for approval. If the consideration of penalties has not reached a conclusion, it shall be presented to the Chief Executive Officer for decision. Once a conclusion is reached, the fact-finding committee shall summarize the investigation results and inform the Secretary of the Risk Management, Corporate Governance, and Sustainability Committee to compile and present them to the Risk Management, Corporate Governance, and Sustainability Committee and the Audit Committee (Independent Directors). However, if the complaint

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is at the level of the Chief Executive Officer, the investigation results must be reported directly to the Audit Committee (Independent Directors).

3. In cases of anonymous complaints where insufficient additional information can be obtained, the matter shall be reported to the Chief Executive Officer for consideration and instruction.

In cases of employee grievances, the company's grievance procedure shall be followed.

Remedial Measures

Upon completion of the investigation, the fact-finding committee, in conjunction with the management of the originating department and relevant agencies, shall jointly consider remedial measures for the corruption incident, such as revising or supplementing company policies, improving or adding internal controls, or changing operational procedures. Remedial measures shall be defined for each case, along with implementation timelines, to be presented to the highest executive of the department, the originating department, and relevant agencies for implementation as prescribed.

3.3 Information Disclosure

The company designates the Chairman of the Risk Management, Corporate Governance, and Sustainability Committee, or personnel assigned by the Risk Management, Corporate Governance, and Sustainability Committee, as the person responsible for disclosing important information regarding anti-corruption measures, as well as decisions to disclose information related to various corruption incidents to external agencies, including regulatory bodies (e.g., the Securities and Exchange Commission and the Stock Exchange of Thailand), or to the public.

The company prohibits individuals who are not authorized or assigned by the Risk Management, Corporate Governance, and Sustainability Committee from disclosing anti-corruption information or any corruption incidents to company personnel, the media, or any other entities. Furthermore, the company will consider penalizing violators without exception.

Malicious Complaints

Reporting complaints, providing tips, giving statements, or providing any information, if proven to be done in bad faith, or with malicious intent to harass, defame, or distort facts, will result in disciplinary action for employees in accordance with the company's employment regulations and rules. In cases involving external individuals, including actions by company employees, that cause damage to the company, the company may consider legal action, as appropriate.

Appendix: Laws Related to Anti-Corruption

Organic Act on Anti-Corruption B.E. 2561 (2018)

- **Section 176** No person shall give, offer, or promise to give any property or other benefit to a Thai government official or a foreign government official to induce them to act, refrain from acting, or delay an action contrary to their duty. Such an act is considered an offer or giving of a bribe, which does not require successful completion or actual receipt to constitute an offense immediately upon the offer. The penalty is imprisonment for not more than 5 years or a fine not exceeding 100,000 Baht, or both. If the act is for the benefit of a legal entity and the legal entity lacks sufficient internal control measures, such as having

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no anti-bribery policy or system, the company shall also be held liable, with a fine ranging from 1 to 2 times the damages incurred or the benefits received by the company from such act.

3 Sections related to Conflict of Interest under the Organic Act on Anti-Corruption B.E. 2561 (2018)

- **Section 126** Government officials are prohibited from engaging in any actions that may create a conflict between personal interests and public interests. If an official has decision-making authority or duties related to approval, licensing, control, or inspection, and discovers that they, their relatives, or close associates have an interest, whether in investments, business benefits, or personal matters, their involvement in deciding on that matter will immediately constitute a conflict of interest. Common examples include procurement where the official has a shared interest with a bidder, or approving budgets for projects in which close associates have an interest.
- **Section 127** After leaving office, government officials with the authority to supervise, approve, or control private organizations are prohibited from taking positions as directors, advisors, representatives, employees, or workers of that private organization within 2 years from the date of leaving office. This section aims to prevent pre-emptive favoritism or using public office to lay the groundwork for oneself or a particular company to receive future benefits. For example, a high-ranking executive in a government agency responsible for approving licenses for a private entity, who soon after retirement or resignation takes a job at a company they previously oversaw, would be considered in violation of this section.
- **Section 128** Government officials are prohibited from accepting property or any other benefits from external individuals that can be valued in money, except in cases received according to custom, which are subject to clear regulations, such as a value not exceeding the amount stipulated by law, or gifts given without hidden intentions of reciprocity. Giving gifts, hospitality, sports tickets, airline tickets, or anything of value or other facilities, if intended to induce government officials to respond by abusing their authority, such as expediting approvals, waiving inspections, or showing favoritism, will be considered a legal offense. Both the giver and receiver may be prosecuted, and in some cases, liability may extend to the giver's organization if there are insufficient control systems or anti-bribery measures.

Examples of actions constituting bribery or corruption

Actions constituting facilitation payments.

Example 1: An employee of Company A Co., Ltd. went to request a standard certificate from a government agency. After the official completed the service, the employee gave a small amount of cash to the official, claiming it was "a token of appreciation for expediting the matter for timely use."

Example 2: While processing import customs clearance, an employee of Company B Logistics Co., Ltd. gave a gift card to a customs official to expedite the release of goods and avoid detailed inspection.

Actions falling under the "Revolving Door" category

Example 1: Company C Consult Co., Ltd. hired a recently retired high-ranking executive from a government agency who was previously responsible for procurement. He was brought in as a government relations consultant to help coordinate with the former agency, where the company frequently participates in bidding.

(Translation)

Example 2: Two months before retirement, a high-ranking official in an industry regulatory agency received an offer from Company D Technology Co., Ltd. to become a board advisor with a regular compensation contract, after the company had just submitted a license application to the agency where that official had approval authority.

Use of external intermediaries (Third Party) in a non-transparent manner.

Company K Supply Co., Ltd. hired an "external consultant" without a clear professional license or role to help monitor the progress of factory permit approvals. The consultant was paid an unusually high monthly fee, and there were no clear performance reports. It was also found that this "consultant" had close ties with officials in the permitting agency.

Actions constituting an offer of a bribe.

A sales employee of Company A Co., Ltd. offered a rare and high-value ticket to a football final match to a client, with the condition that the client must decide to use the company's services first to receive the ticket. Offering a gift with such a condition is considered an attempt to improperly induce business benefits and may constitute an offer of a bribe under the law, as its purpose is to secure a business contract or agreement.

Actions constituting the receipt of a bribe.

Company B Co., Ltd., a major distributor for the organization, contacted and requested that a relative of a management-level employee within the organization be hired by Company B, without going through the normal recruitment process. Company B clearly expressed the expectation that if this offer was accepted, Company B would receive continued business from that organization. If the employee accepts this offer, it could be considered receiving a bribe, as it implies personal gain from a business partner in exchange for facilitating business advantages.