TMI

บริษัท ธีระมงคล อุตสาหกรรม จำกัด (มหาชน)

TEERA-MONGKOL INDUSTRY PUBLIC COMPANY LIMITED

บริษัท ธีระมงคล อุตสาหกรรม จำกัด (มหาชน)

Teera-Mongkol Industry Public Co., Ltd.

คู่มือต่อต้านการทุจริตคอร์รัปชัน

Anti-Corruption Manual

Table of Contents

Page

Announcement of Teera-Mongkol Industry Public Company Limited 2

Requirements for Making Anti-Corruption Manual 3

1) Objective 3

2) Definitions 3

Anti-Corruption-Related Policies 5

1) Political Actions

2) Giving and Receiving Gifts, Business Receptions, Entertainment Expenses, Service Fees, or Other Benefits (Facilitation Payments) 5

3) Charitable Contributions 5

4) Sponsorship 5

5) Business Relationships and Procurement with the Government (Resolving Door) 5

6) Conflict of Interest 5

Anti-Corruption Guidelines 6

1) The Setting of Anti-Corruption-Related Policies 6

2) Anti-Corruption Guidelines 6

Anti-Corruption Measures 10

1) Corruption Risk Assessment 10

2) Complaint Filing and Whistleblower Protection 11

Penalties 13

Communication and Dissemination 13

Monitoring, Evaluation, and Policy Review 13

Report Form for Giving or Receiving Gifts, Souvenirs, or Other Benefits 15

Announcement of Teera-Mongkol Industry Public Company Limited

Corruption is a severe problem not only at the organizational level but also at the local and national levels. Therefore, the Board of Directors and the management of the Company have established anti-corruption policies at all levels. These policies have clearly defined the "acceptance of gifts or other benefits that unfairly influence decision-making in the performance of duties" and "bribery" to ensure that employees and stakeholders are aware of and adhere to these policies.

The Company prohibits employees from accepting or giving any gifts for any benefit from individuals with duties or business related to the organization, whether vendors, subcontractors, or contractors. These clear guidelines prevent non-transparency and unfairness in business dealings between vendors, contractors, and subcontractors, thus preventing corruption and unfair business practices, including bidding for government projects. To further strengthen its anti-corruption efforts, the Company signed a declaration of intent to join the Thai Private Sector Collective Action against Corruption (CAC) in 2021 and has established guidelines for combating corruption in various areas. Furthermore, various channels have been established for employees or individuals with information (whistleblowers) to report corruption directly to management or to send emails to the Company secretary, executive director, audit committee member, or board member. The Company has established appropriate protective measures for whistleblowers to prevent them from facing negative consequences for their reporting.

Furthermore, the Board of Directors, management, and employees of the Group express would like to express commitment and dedication to conducting business sustainably, based on integrity, transparency, fairness, and complete non-involvement in all forms of corruption.

On behalf of Teera-Mongkol Industry Public Company Limited

Announced on December 12th, 2025

(Dr. Thanu Kulachon)

Chairman of the Board

(Mr. Teerachai Prasitrattanaporn)

Chief Executive Officer and Managing Director

(Dr. Teerasak Prasitratanaporn)

Chief of Anti-Corruption Working Group

Head Office: 46/67-69 Moo 3, Leab Klong Siwapasawad Rd., Kokkrabue, Muang, Samut Sakhon 74000
Tel. +66(0)34-854-629 Fax. +66(0)34-854-630
Sale Office: 260/2 Charoen Nakorn Rd., Samrae, Thonburi, Bangkok 10600
Tel. + 66(0)2-877-9510-22 Fax. +66(0)2-877-9522-23
For more information, please visit www.thaiballast.com

Requirements for Making Anti-Corruption Manual

Teera-Mongkol Industry Public Company Limited, together with its subsidiaries, ("the Company") has declared its intention to join the "Private Sector Collective Action Coalition Against Corruption (CAC)" on November 16th, 2021. In line with this declaration of intent to combat corruption, the Company has prepared a written "Anti-Corruption Manual," which has been approved by the Board of Directors of the Company on December 12th, 2025. The Company also mandates regular reviews of the Manual to ensure that it reflects changes in circumstances and relevant laws, and to provide clear guidelines for the performance of duties by the Board of Directors, executives, and employees across the entire group.

The requirements for the preparation of the Anti-Corruption Manual are detailed as follows:

1) Objective

The Company has developed the Anti-Corruption Manual with the objective of raising awareness about corruption and establishing guidelines and responsibilities for the Board of Directors, management, and employees of the Company, with the emphasis on the damage caused by corruption, with impacts on individuals, families, organizations, the society, and the nation, as well as having effects on reputation and economic or financial effects. The Company has composed this manual to provide a framework for its involving personnel, fostering sustainable organizational growth based on fairness, integrity, and honesty.

2) Definitions

"Company" refers to Teera-Mongkol Industry Public Company Limited, including its subsidiaries.

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

"Business Partner" refers to legal entities or individuals involved in the business of the Company or its subsidiaries.

"Corruption" refers to the pursuit of personal gain and misconduct, including the abuse of power or position to seek personal, family, or associate benefits through manipulation or trickery to obtain undue advantages. This mostly involves illegal and immoral acts such as bribery, accepting bribes, embezzlement, fraud, receiving undue benefits, abuse of power, neglect of duty, and conflicts of interest, causing damage to the organization, the society, and the country.

"Charitable Donation" refers to activities involving the spending of money without receiving monetary return.

"Public Benefit Donation" refers to activities involving the spending of money to benefit groups, communities, or the society, both directly and indirectly, which may not yield tangible returns.

"Political Support" refers to activities involving legally sanctioned political assistance, including financial and other forms of assistances, both direct and indirect ones. This refers to support related to politics, political parties, politicians, or those with political roles, which must be conducted properly, transparently, and with accountability, and must be approved by the Board or Executive Committee of the Company.

"Financial Support" refers to money paid for services or benefits that are difficult to measure and may be linked to bribery. For example, financial support may have ulterior motives, using charity as a cover in

exchange for benefits such as contracts, bidding, waiver of fees/fines, suspension of duties, assistances, or obtaining other business opportunities that are not attainable through normal procedures.

"Business Entertainment" refers to expenses for leisure activities related to the Company, including food and beverages, social gatherings, seminars, conferences, recreational or sporting activities that are customary, and for building understanding or good business relationships.

"Facilitation Payment" refers to informal expenses paid to government officials to ensure that officials follow procedures or to expedite processes, while still performing their duties within the correct scope of their authority without requiring additional discretion, and within the scope that legal entities or individuals are normally entitled to receive under the law, such as license renewals, submitting applications for various certifications, or receiving various public services.

"Bribery" refers to compensation or gifts offered or given in exchange for an action or omission that violates a person's duties and responsibilities, particularly those of government employees/officials.

Government Employees/Officials/Authorities include:

- Political office holders;
- Civil servants or government employees holding permanent positions or receiving salaries in both central and local government agencies;
- Employees or individuals working in state enterprises, public organizations, or government agencies; or
- Directors, sub-committee members, government employees, individuals, or groups of individuals empowered or authorized to carry out certain actions under the law from state enterprises, public organizations, or government agencies.

"Employment of a Government Employee" refers to a case where any of government personnel is working in a private organization, or a case where any of private sector personnel is working on policy in the government sector. This may involve risks of corruption or conflicts of interest arising from working in both sectors, leading to unfair or biased oversight, or the promotion of government policies that benefit their own sector.

"Conflict of Interest" refers to having other or external interests that conflict with the interests of the group of the Company. Such other interests may be financial interests or personal relationships that affect considerations or decisions, potentially causing damage to the organization.

Anti-Corruption-Related Policies

The Company has established clear anti-corruption measures for directors, executives, and employees to accurately comply with, as follows.

1) Political Actions

The Company is politically neutral and supports any actions that is in line with the democratic system with the constitution with monarchy and the governances of the countries in which the Company conducts business. The Company encourages its directors, executives, and employees to exercise their political rights under the law, so that the Company can conduct business free from political and public pressure.

2) Giving and Receiving Gifts, Business Receptions, Entertainment Expenses, Service Fees, or Other Benefits (Facilitation Payments)

The Company stipulates that the giving and receiving of gifts, business receptions, entertainment expenses, service fees, or other benefits related to business operations may be done within reasonable limits according to customs and traditions to maintain business relationships. However, these actions must not be intended to induce neglect of duty or intentionally commit corruption, nor must they influence the Company's decision-making in a way that could lead to corruption.

3) Charitable Contributions

The Company requires that “charitable contributions” be supported by evidence or verifiable proof that they are for the public benefit. Donations must be properly and completely documented in the Company's name and must not be tainted by any hidden benefits that could lead to corruption.

4) Sponsorship

The Company allows "the actions of giving of Company’s money or assets" that have the goal of supporting projects or activities that enhance the Company's positive image and reputation.

5) Business Relationships and Procurement with the Government (Resolving Door)

The Company requires that government procurement adhere to proper regulations and procedures, be conducted under transparent and fair competition, and not involve bribery to influence the decision-making of relevant government officials.

Furthermore, the Company does not hire or appoint current government employees/officials to work within the organization. For former government employees/officials, a two-year waiting/suspension period is required. This hiring process is in accordance with Articles 126 and 127 of Prevention and Suppression of Corruption Act B.E. 2561 (A.D. 2008).

6) Conflict of Interest

The Company requires directors, executives, and employees to perform their duties with honesty and accountability, and to protect the Company's interests, to prioritize the Company's best interests and to refrain from activities that may create a conflict of interest.

Anti-Corruption Guidelines

As the Company has declared its intention to join the Thai Private Sector Collective Action Against Corruption (CAC) to demonstrate its commitment to transparent business operations based on good governance principles, the Company has established anti-corruption policies and guidelines as detailed below:

1) The Setting of Anti-Corruption-Related Policies

To ensure that the performance of duties by directors, executives, and employees is in accordance with anti-corruption principles, the Company has established the following anti-corruption policies and guidelines.

1.1) Corporate Values

The Company prioritizes business conducts that are based on sustainable growth, with emphasis on fairness, integrity, honesty, and responsibility towards oneself, society, and the environment. This requires unity and cooperation (T: Team Spirit), diverse skills (Modern Skill), and continuous innovation (Innovative Mind) to drive the organization towards its defined goals.

1.2) Code of Conduct

The Board of Directors and executives have established a code of business ethic (Code of Conduct) for directors, executives, and employees at all levels to adhere to. This ensures that operations are conducted ethically, with integrity, transparency, respect for the rights of all stakeholders, and equal and fair treatments, which are subject to scrutiny.

1.3) Anti-Corruption Policy

The management and Board of Directors of the Company have established anti-corruption policies at all levels. These policies clearly define "The acceptance of gifts or other benefits that unfairly influence decision-making in the performance of duties" and " bribery," to ensure that employees and stakeholders are aware of and adhere to such policies.

It is stipulated that directors, executives, and employees are prohibited from accepting or giving any gifts for any benefit from individuals with duties or business related to the organization, including vendors, subcontractors, contractors, and those involved in bidding for government projects, and from hiring government employees. The Company has clearly defined these guidelines prevent a lack of transparency, conflicts of interest, and unfair trade practices among vendors, contractors, and technicians, which could lead to corruption.

Furthermore, the Company has established appropriate internal control systems, a complaint system, and whistleblower protection, including appropriate sanctions in accordance with regulations of the Company and relevant laws.

2) Anti-Corruption Guidelines

The Company has established anti-corruption guidelines in the different areas as follows.

2.1) Political Actions

Directors, executives, and employees at all levels have the right to freedom of political participation and can participate in political activities under the provisions of the Constitution. The following guidelines apply:

(1) Directors, executives, and employees should avoid serving as committee members of political parties, representing political parties in public activities, or becoming members of local

government organizations, or displaying in any way that leads others to believe that the Company is involved in, supports, or favors polity or any political party.

(2) Directors, executives, and employees must not use the status as an employee or use any asset, equipment, or tool of the Company for any political activity.

(3) Directors, executives, and employees should avoid expressing political opinions at the workplace or during work hours that may lead to ideological conflicts.

2.2) Facilitation Payments (Gifts, Entertainment, Services, Business Receptions, or Other Benefits)

Directors, executives, and employees should be cautious in accepting or giving benefits that are incentives, or instructing others, including spouses and relatives of employees, to receive or give benefits on their behalf, which may affect business decisions made on behalf of the Company, or for the purpose of career advancement or annual performance review, including gifts, souvenirs, money, property, or any other benefit that can be calculated in monetary terms, such as debt reduction or a gratuitous debt reduction, interest-free loans, services provided free of charge or without interest, or services to others with fee charged at a rate lower than the normal rate in commercial practice, and other actions that result in a benefit that can be calculated in monetary terms or without incurring any expenses, with the following guidelines:

(1) Directors, executives, and employees must not demand or accept inappropriate, dishonest, or excessive monetary benefits or items from those involved in the Company's business;

(2) Directors, executives, and employees must not demand or accept monetary benefits or items from individuals or legal entities with whom they conduct business, whether demanding or receiving for themselves or others;

(3) In cases where a legal entity or external individual involved in business with the Company gives items or benefits to an executive or an employee as a token of appreciation, that executive or employee must exercise discretion in considering the appropriateness, suitability, and/or compliance with general customs and practices;

(4) In the case of giving gifts, entertainment expenses, or various service fees to external legal entities or individuals, such an action must be carried out on behalf of the Company as authorized or assigned only;

(5) Any gift the value of which is greater than the value of gift that sane people shall give to each other between a chief and a subordinate in whatsoever occasion should not be given or received;

(6) Directors, executives, and employees, as well as their families, must avoid giving or receiving gifts or benefits from business partners or those involved in the Company's business, except for the benefit of normal business operations or during festivals or traditional customs.

2.3) Charitable Contributions

Charitable donations must be supported by evidence or proof that they are for public benefits. There must be proper and complete documentation of the donation in the Company's name, and it must not be a donation with other benefits hidden leading to corruption. The following guidelines apply to charitable donations:

(1) Charitable donations must be reviewed by the Assistant Managing Director, Deputy Managing Director, or the Executive Committee according to the approval authority structure only;

(2) The coordinator or designated person must verify the credibility of the recipient organization, check the amount or value of the donated money or items, and request for relevant documents such as a donation notification letter;

(3) The coordinator or designated person presents the information to the approving authority as per Item (1) for consideration of the necessity and value of the donation;

(4) Upon approval, the coordinator or designated person requests expense reimbursement from the purchasing department or items from the warehouse department for donation, and submits the donation along with a donation acknowledgment document or receipt in the Company's name; and

(5) The coordinator or designated person notifies the accounting department for tax processing.

2.4) Sponsorship

Giving money or assets of the Company is permitted where the objective must be to support projects or activities that enhance the Company's positive image and reputation, with the following guidelines:

(1) Disbursements for support must have clear project objectives and details, and must be reviewed and considered in the correct and complete procedures in accordance with regulations of the Company; and

(2) The support for any project or activity must be in the name of the Company only and must be aimed solely at building a positive reputation and image for the organization.

2.5) Business Relationships and Procurement/Purchasing with the Public Sector (Resolving Door)

The Company mandates that procurement/purchasing with the public sector must adhere to proper procurement regulations and procedures, and be conducted under transparent and fair competition. Furthermore, the Company does not hire or appoint current government employees/officials to work within the organization. For former government employees/officials, a two-year waiting/suspension period is required. This hiring process is based on Articles 126 and 127 of Prevention and Suppression of Corruption Act B.E. 2561 (A.D, 2018), with the following guidelines:

(1) In case of a participation in government project bidding, the Company instructs relevant parties to monitor bidding announcements from various agencies where the Company can provide services or goods, and to prepare documents and submit bids correctly according to the procedures of each agency. Bribery or giving gifts to obtain information that gives an unfair advantage to competitors or undermines competitors is prohibited. Fair and just competition conditions must be followed.

(2) Concerning hiring or employing government officials/employees:

- The Company does not hire government officials/employees to work within the organization.

- Employee recruitment documents clearly indicate any relationship with government officials/employees or their position as government officials. The Company will carefully consider this relationship information when evaluating employment to prevent conflicts of interest.
- The appointment of directors and advisors is clearly disclosed, allowing for transparent verification of the background of each director and advisor, and eliminating conflicts of interest.

2.6) Conflict of Interest

Any decision-making or action regarding the Company's affairs by directors, executives, and employees must be in the best interest of the Company, and free from the influence of personal, family, or close associates' desires. The following guidelines apply.

(1) Directors, executives, and employees must protect the Company's interests and refrain from any action that would harm the Company's interests or misappropriate Company benefits for personal gain or for clients.

(2) Directors, executives, and employees must not accept any money or personal compensation from clients, business partners, or any other person for work performed on behalf of the Company.

(3) Any business activity that is conducted by directors, executives, or employees must not affect their duties and working hours for the Company.

(4) Directors, executives, and employees must not become partners, shareholders with decision-making power, or directors or executives in any business that competes with or is similar to the Company. However, if it is unavoidable, they must report the case their superiors immediately. If directors, executives, and employees become involved in any business or event that may create a conflict of interest, they must report to their superiors immediately.

(5) Directors, executives, and employees must not seek for benefits for themselves or any related party using any information of the Company that has not been publicly disclosed, and must not engage in any action that may create a conflict of interest with the Company.

(6) As for any business activity with the Company personally, or in the name of family or any juristic person that any of the directors executives, and employees holds any stake, the stake must be disclosed to the Company before the activity is done or any action is carried out in the name of the Company.

(7) Any of directors, executives, and employees with a stake is prohibited from approving any transaction or taking any action on behalf of the Company.

(8) Any party acting on behalf of the Company has a duty to verify the relationship of the business partner to ensure it does not involve any of directors, executives, or employees before entering into the transaction, in order to prevent any potential conflict of interest.

Anti-Corruption Measures

The company has set out anti-corruption measures with the following details.

1) Corruption Risk Assessment

1.1) Objective

To identify various corruption risks, the likelihood of occurrence and their impacts on various aspects, as well as to consider appropriate preventive and remedial approaches, including the determination of penalties and related regulations.

1.2) Scope of Assessment

This assessment covers the identification of the root causes of corruption problems, ways to prevent similar risks from recurring, and solutions to problems that have already occurred, including determining penalties and reviewing various measures.

1.3) Stakeholders

(1) The Board of Directors: Responsible for approving and overseeing anti-corruption policies and guidelines to ensure they are accurate, clear, practical, and verifiable.

(2) The Audit Committee: Responsible for reviewing anti-corruption assessment documents, financial and accounting reports, internal control and audit systems, and ensuring that the Company complies with relevant regulations.

(3) The Risk Management Committee: Responsible for managing corruption risks and strategies in accordance with the actual situation, and reporting progress and results of corruption risk management to the Board of Directors.

(4) The Executive Committee: Responsible for implementing anti-corruption policies, enforcing guidelines in operations, and reviewing and modifying guidelines and measures to fit business, circumstances and rules and regulations.

(5) Internal Audit Department: Responsible for auditing and reviewing operational systems to ensure compliance with anti-corruption guidelines, maintaining effective internal controls to prevent corruption, and reporting anti-corruption audit results to the Audit Committee; and

(6) Anti-Corruption Working Group: Responsible for developing anti-corruption policies and guidelines for submission to the Audit Committee, conducting anti-corruption training, handling complaints, and reporting findings from investigations to the Audit Committee

1.4) Main Steps in Corruption Risk Assessment:

(1) To define risk measurement criteria in terms of likelihood and impact.

(2) To determine the acceptable risk level for the organization and the level requiring corrective or urgent action.

(3) To analyze the risk situation and its impact, comparing existing anti-corruption measures within the organization and considering additional preventive measures.

(4) To develop additional risk prevention measures in order to reduce the risk of each issue; and

(5) To prepare a record of the risk assessment results and all related information and to submit the report to the relevant parties

2) Complaint Filing and Whistleblower Protection

2.1) Key Procedures for Complaints/Whistleblowing

Directors, executives, and employees have the duty and responsibility to report clues or file complaints when they witness any illegal activity or corruption, or when they find deficiencies in the internal control system for preventing corruption. The following actions constitute violations against the anti-corruption guidelines:

(1) The failure to comply with the anti-corruption guidelines or committing illegal acts;

(2) Advising, encouraging, or supporting others to disregard the anti-corruption guidelines;

(3) Neglecting or ignoring violations or non-compliance with the anti-corruption guidelines that they are aware of or should be aware of;

(4) The failure to cooperate or the obstruction to the investigations into alleged violations or non-compliance against the anti-corruption guidelines; and

(5) Acting unfairly towards others in cases where an event of non-compliance against the anti-corruption guidelines is reported.

2.2) Recipients of Complaints and Clues

Any directors, executive or employee that witnesses violations against the law or non-compliance against the anti-corruption guidelines may submit questions or complaints to the following individuals:

Recipient	Channels for Complaint Filing	
Trusted Head at Any Level	Direct Contact/ E-mail	Teera-Mongkol Industry Public Company Limited 260/2 Charoen Nakhon Road, Samrae Sub-district, Thonburi District, Bangkok 10600
Manager	Direct Contact/ E-mail	
Director	E-mail: md@thaiballast.com	
Internal Auditor	E-mail: corp.sec@thaiballast.com	
Audit Committee	E-mail: auditcommittee@thaiballast.com	
Executive Committee	E-mail: directors@thaiballast.com	
Secretary	Telephone Number: 0 2877 9510-21 Extension 350 E-mail: corp.sec@thaiballast.com	

2.3) Complaint Management Process

(1) Fact Gathering

The recipient of the complaint will either personally gather the facts relating to the violation or non-compliance against the anti-corruption guidelines or assign this task to a suitable person.

(2) Data Processing and Filtering

The recipient of the complaint will process and filter the data to determine appropriate steps and methods for handling each matter. This may involve:

- Acting personally or delegating the task to another person within the recipient's authority; or

- Reporting to the person authorized to act and involved in the matter.

(3) *Determining Actions*

The person acting under (2) will determine appropriate measures to mitigate the violation or non-compliance against the anti-corruption guidelines, including termination or dismissal according to regulations of the Company. In a significant case, the recipient of the complaint will report the results to the Audit Committee and/or the Board of Directors, such as matters affecting the Company's reputation, image, or financial standing, conflicts with the Company's business policies, or involvement of senior management.

(4) *Reporting Results*

The recipient of the complaint is responsible for informing the complainant of the results under (3) if the complainant discloses their identity. and report to higher-level superiors.

2.4) Rights or Protection of Complainants or Whistleblowers

The Company protects the rights of complainants or whistleblowers who act in good faith. The Company will listen to all complaints equally, ensure fairness to all parties, and keep the information of complainants or whistleblowers confidential. They will be protected from harassment, both during and after the investigation. Reporters, complainants, whistleblowers, or those cooperating in the investigation will receive the following protections.

(1) Reporters, complainants, whistleblowers, or cooperators may choose not to disclose their identity if they believe that disclosure would compromise their safety or cause any harm. However, disclosing their identity will allow the Company to report progress and provide factual information more easily and quickly.

(2) The Company will treat relevant information as confidential one and will disclose it as necessary only, considering the safety and potential harm to the reporter, the source of the information, or related individuals.

(3) If a complainant believes they may be unsafe or suffer harm, they may request the Company to implement appropriate protective measures. Alternatively, the Company may implement protective measures without a request from the complainant if it deems that there is a likelihood of harm or insecurity.

(4) Reporters, complainants, and whistleblowers or cooperators who suffer harm or damage will receive relief through an appropriate and fair process.

Penalties

The Company has established penalties for cases where complaints are received or where there is evidence of violations or non-compliance against regulations resulting in damage to the organization. Such actions shall be deemed a violation against the Company's work regulations, as appropriate, to allow for corrective action, warnings, or orders for improvement or development, as a case may be. Those who violate regulations or laws will be subject to disciplinary actions in accordance with Company's regulations with fairness. If found guilty, they may also face legal penalties, particularly if the act is deemed illegal, such as the penalties in accordance with Anti-Corruption Act B.E. 2561 (A.D. 2018).

Article 176:

Whoever gives, offers, or promises to give property or other benefits to a government official, a foreign government official, or an official of an international organization to induce them to act, refrain from acting, or delay acting in a manner contrary to their duty, shall be liable to imprisonment for a term not exceeding 5 years or a fine not exceeding 100,000 baht, or both.

In cases where the offender under Paragraph One is a person associated with a legal entity and acts for the benefit of that legal entity, and that entity lacks appropriate internal control measures to prevent such offense, that legal entity shall be guilty under this Article and shall be subject to a fine of not more than 1 times but not exceeding 2 times the damages incurred or benefits received.

A juristic person referred to in Paragraph Two shall mean a juristic person established under Thai law and a juristic person established under foreign law that conducts business in Thailand.

A person related to a juristic person as referred to in Paragraph Two shall mean a representative of the juristic person, an employee, an agent, an affiliated company, or any person who acts for or on behalf of that juristic person, whether or not having the duty and authority to do so.

Communication and Dissemination

The Company shall communicate and disseminate this manual on the Company's website: <www.thaiballast.com> under the heading of <About Us / Content> to demonstrate its commitment to combating all forms of corruption to directors, executives, employees, shareholders, business partners, external parties, or all stakeholders, so that they are aware of and can use it as guidelines.

In addition, the Company shall require directors and executives to review the anti-corruption manual through a joint review meeting at least once a year and shall also require employees to learn and review this manual through annual training at least once a year, as well as discuss it in smaller meetings.

Monitoring, Evaluation, and Policy Review

The Company has established procedures for monitoring the compliance with anti-corruption guidelines at all levels, i.e., directors, executives, and employees. The Company has incorporated the anti-

corruption manual into its self-learning resources through various learning materials and communicates these guidelines on various occasions, emphasizing the importance of anti-corruption principles in performing duties.

Furthermore, the Company has set out that monitoring is the responsibility of all supervisors at every level, considering it part of employee discipline. The Executive Committee, Risk Committee, Audit Committee, and Board of Directors oversee compliance at each level of the organizational structure to ensure consistent adherence to the anti-corruption manual. Policies and practices are reviewed at least once a year.

Report Form for Giving or Receiving Gifts, Souvenirs, or Other Benefits

Date: .....

I, [Name-Surname] ..... [Position] ..... [Department/Division] ..... would like to report on the giving/receiving of gifts, souvenirs, or other benefits as follows:

Order	Date	Received from, Presented to (Name of Other Company and Business Relationship with the Company)	Objective (Please Specify)	Details of Gift, Souvenir or Other Benefit	Quantity	Total Value (Baht)

*Please cross irrelevant statements or words out.

I have reported the receipt/giving of gifts, souvenirs, or other benefits as listed above, in order to ensure that all transactions are conducted honestly, clearly, transparently, and verifiably, in accordance with the Company's policy.

Signed .....Reporter
(.....)
...../...../.....

Signed..... Head/Chief
(.....)
...../...../.....

Signed ..... Managing Director
(.....)
...../...../.....