



# ANTI-CORRUPTION POLICY

Version 2/2025 VNG-GOV-AC-PL-02

Effective Date: 11 November 2025



## **Anti-corruption Policy**

### **Vanachai Group Public Company Limited and Subsidiaries**

Vanachai Group Public Company Limited and its subsidiaries (“the Company”) recognize the importance of preventing unlawful and unethical acts that undermine public trust, obstruct economic development, and expose the organization and individuals to legal, financial, and reputational risks. The Anti-corruption Policy aims to foster integrity, responsibility, and fairness by establishing clear standards of conduct, providing employee education, and creating mechanisms for reporting and addressing violations.

At the societal level, anti-corruption plays a vital role in upholding justice and human rights. It prevents the erosion of legal systems, fairness, and social cohesion, while strengthening public confidence in institutions and democratic processes – foundations of national stability. Furthermore, it promotes fair competition by preventing bribery and market misconduct and enhances the efficiency and integrity of public resource management for the greatest benefit of the people.

At the organizational level, this policy safeguards the Company against legal and financial harm arising from breaches of law or bribery, protects the Company’s reputation from unethical behavior, and reinforces trust among investors, business partners, and customers who value transparency and business ethics. It also nurtures a corporate culture of accountability and openness, ensuring that all employees understand their roles and responsibilities and feel confident to raise concerns when encountering unethical practices.

#### **1) Objectives**

- This policy establishes clear, transparent, and standardized guidelines applicable across the entire organization, with the following key objectives:
- To prevent and combat all forms of corruption, whether direct or indirect
- To promote a corporate culture founded on integrity, transparency, and business ethics
- To establish a strong internal control system capable of preventing, detecting, and effectively managing corruption-related risks
- To ensure that all employees, management, and business partners understand the importance of conducting business in full compliance with applicable laws
- To safeguard the Company’s reputation, credibility, and image as a highly ethical and well-governed organization

#### **2) Policy Alignment and International Standards**

The Company’s Anti-corruption Policy has been developed in alignment with the principles of Good Corporate Governance (GCG) and internationally recognized governance

standards to ensure transparent, accountable, and trustworthy business operations that earn the confidence of all stakeholders.

This policy is guided by the following key frameworks and standards:

- **Global Reporting Initiative (GRI):**
  - **GRI 205:** Anti-corruption – Identification and assessment of corruption risks, employee training, and disclosure of anti-corruption performance results.
  - **GRI 102-16, 102-17** – Promotion of corporate values, ethics, and mechanisms for seeking advice or reporting misconduct.
- **UN Global Compact Principle 10 and SDG 16** – Promoting transparency, justice, and strong institutions in business operations.
- **ISO 37001: Anti-Bribery Management System (ABMS):** The international standard for establishing, implementing, maintaining, and improving an anti-bribery management system, enabling effective and tangible internal control.
- **UN Global Compact – Principle 10:** Encourages businesses to act against all forms of corruption, including extortion and bribery.
- **OECD Guidelines for Multinational Enterprises:** Provides responsible business conduct guidance for multinational enterprises to operate transparently, fairly, and without discrimination.
- **Securities and Exchange Commission (SEC) and Stock Exchange of Thailand (SET) Governance Code:** Defines good governance principles for Thai listed companies to promote transparency and prevent corruption at all levels.
- **FTSE Russell ESG Indicators:**
  - **GAC01-02:** Anti-Bribery and Corruption – Establishing clear anti-bribery and corruption policies and controls.
  - **GAC05:** Whistleblowing and Reporting Mechanisms – Ensuring secure and transparent whistleblowing channels.
  - **GAC03-04:** Board Oversight and Ethical Governance – Reinforcing board-level supervision and ethical leadership
  - **GAC08:** Training for staff on anti-corruption policy
  - **GAC09-10:** Corruption risk assessment and anti-corruption procedures in operations

### 3) Scope

This policy applies to:

- **All levels of employees:** including permanent, contract-based, daily wage, and trainee employees.
- **All business units and operations:** including factories, headquarters, distribution centers, and all domestic and international subsidiaries.

- **All stakeholder groups directly or indirectly involved in the Company's operations:** such as shareholders, employees, customers, consumers, business partners, suppliers, creditors, government agencies, communities, and competitors.
- **All Company activities that may impact stakeholders:** across economic, social, and environmental dimensions.
- **Stakeholder relationship management:** including communication and response to material concerns raised by stakeholders.  
*(Aligned with GRI 102-40, FTSE Russell SRSO2, and SDG 17 – Partnerships for the Goals)*

#### 4) Definitions and References

- **Corruption:** The abuse of entrusted power, authority, or position for personal or third-party gain, whether direct or indirect, including giving, receiving, or soliciting bribes and all forms of improper advantage.
- **Bribery:** The offering, promising, giving, or receiving of money, property, services, or any valuable item to induce a person to act or refrain from acting in violation of their duties or business ethics.
- **Conflict of Interest:** A situation where an individual's personal interests could improperly influence their judgment, decisions, or actions, potentially conflicting with the Company's best interests.
- **Money Laundering:** Any act intended to disguise or conceal the origins of assets obtained through illegal means, making them appear legitimate.
- **Fraud:** Any deliberate act of deception, misrepresentation, or concealment of facts committed to obtain financial or personal benefit, causing loss or damage to the Company or others.
- **Extortion:** The use of force, intimidation, or abuse of power to compel another person to provide money, benefits, or favors.
- **Facilitation Payment:** A small, unofficial payment made to government officials or others to expedite routine administrative or business procedures, which constitutes a form of bribery.
- **Stakeholders:** Individuals or groups directly or indirectly affected by the Company's operations, such as shareholders, customers, partners, employees, government agencies, and communities.
- **Whistleblowing:** The act of reporting suspected or actual misconduct, corruption, policy violations, or unethical behavior through designated Company reporting channels.
- **Vanachai Integrated Materiality and Risk Assessment (V-IMRA):** An internal assessment framework used by the Company to identify, assess, and prioritize sustainability-related impacts, risks, and opportunities across its operations and value chain. V-IMRA integrates both impact materiality and financial materiality considerations and provides

structured inputs to the Enterprise Risk Management (ERM) system, strategic planning, and management decision-making.

*(Aligned with FTSE Russell GAC01–GAC07, GRI 205, ISO 37001, COSO Framework, UN Global Compact Principle 10, SDG 16, and SDG 17.)*

## 5) Governance and Accountability

- **Board of Directors:** Approves and oversees the implementation of the Anti-Corruption Policy, setting the overall direction, strategy, and governance framework to ensure that the Company’s operations are lawful, transparent, and aligned with international standards and best practices.
- **Audit Committee:** Monitors, reviews, and evaluates compliance with this policy, reports findings and recommendations to the Board of Directors, and ensures the effectiveness of the Company’s anti-corruption risk management processes.
- **Sustainability Committee:** Serves as the Policy Owner, responsible for driving the implementation of this policy in alignment with the **Company’s sustainability strategy, “Forest | Future | Together – for a Sustainable Living.”** The Committee regularly reports progress and performance updates to the Board of Directors.
- **Executive Management:** Communicates, implements, and demonstrates a strong Tone at the Top in compliance with the Anti-corruption Policy. Executives are responsible for fostering an organizational culture grounded in integrity, transparency, and ethical business conduct.
- **Internal Audit Unit:** Conducts regular reviews to verify compliance with this policy and reports findings directly to the Audit Committee, ensuring transparency, accountability, and mitigation of corruption risks.
- **All Employees:** Every employee—whether permanent, contract-based, daily wage, or trainee—has the duty and responsibility to strictly comply with this policy by:
  - Understanding and adhering to the Anti-corruption Policy and related procedures.
  - Refusing to participate in any activity that may involve bribery, corruption, or unethical business conduct.
  - Reporting any suspected or observed cases of corruption through the Company’s whistleblowing channels without fear of retaliation.
  - Cooperating fully with internal investigations and providing truthful information.
  - Supporting the promotion of a transparent and ethical work environment by performing duties with honesty and respect for human rights.

The Company actively encourages participation from all levels of employees in preventing corruption, recognizing integrity and transparency as core values essential to sustainable business operations.

*(Aligned with FTSE Russell GAC07 – Board Oversight and Ethical Governance, GAC02 – Whistleblowing, GRI 205-2, and SDG 16 – Peace, Justice and Strong Institutions.)*

## **6) Commitments and Principles**

The Company is committed to conducting business with integrity, transparency, and fairness, upholding the principles of good corporate governance and business ethics to prevent and combat all forms of corruption, whether direct or indirect. The following commitments and principles guide the Company's anti-corruption operations:

### **6.1 Compliance with Laws and International Standards** *(FTSE Russell GAC01, GRI 205-2, SDG 16.5):*

- The Company complies with all relevant laws, regulations, and practices related to anti-corruption in both domestic and international contexts – including the Anti-corruption Act, laws on bribery of government officials, and the rules and guidelines of the Stock Exchange of Thailand.
- The Company also adheres to international frameworks such as the UN Global Compact Principle 10, OECD Guidelines for Multinational Enterprises, and GRI 205: Anti-corruption.
- Furthermore, the Company ensures that all employees and business partners clearly understand and strictly comply with these legal and ethical requirements.

### **6.2 Corruption Risk Prevention and Mitigation** *(FTSE Russell GAC01, GAC07, GAC09, GRI 205-1, SDG 16.6):*

- The Company conducts an annual corruption risk assessment and integrates the results into the Enterprise Risk Management (ERM) framework to establish robust internal controls preventing bribery, embezzlement, misuse of insider information, or conflicts of interest.
- The Company applies Due Diligence guidelines and forms for the selection and evaluation of business partners to ensure that all partners maintain ethical standards and effective control systems.

### **6.3 Conflict of Interest Management and Business Transparency** *(FTSE Russell GAC01, GRI 205-2, SDG 16.6):*

- The Company encourages all directors and employees to disclose any personal interests that may conflict with the Company's interests and has implemented internal verification mechanisms to prevent misuse of position or confidential information.
- All processes related to procurement, donations, sponsorships, and business decision-making must be transparent, auditable, and properly approved by authorized persons in accordance with Company regulations.

**6.4 Communication, Training, and Organizational Culture** (FTSE Russell *GAC07*, GRI 205-3, SDG 16.10):

- The Company provides accurate, clear, and verifiable information regarding its products and operations, complies with consumer protection laws, and assumes responsibility for any potential impacts arising from product use.
- The Company also promotes awareness and training programs to strengthen the organizational culture of integrity and accountability while supporting sustainable consumption and production practices.

**6.5 Disclosure, Whistleblowing, and Protection of Whistleblowers** (FTSE SRS07, GRI 102-43, SDG 17):

- The Company maintains a secure and confidential Whistleblowing System that enables employees, partners, and stakeholders to report suspected unethical or corrupt behavior without fear of retaliation.
- The Company guarantees the confidentiality and anonymity of whistleblowers, protects their personal data, and conducts all investigations in a fair, transparent, and timely manner, with findings reported to the Audit Committee.

**6.6 Ethical Governance and Integrity in the Supply Chain** (FTSE Russell *GAC01*, *GAC07*, GRI 205-2, SDG 12.6, SDG 17):

- The Company expects all business partners and suppliers to operate with integrity, transparency, and ethical conduct in accordance with the Supplier Code of Conduct and the Company's Anti-corruption Policy.
- Regular audits and evaluations of suppliers are conducted, along with training and capacity-building initiatives to promote ethical governance and drive a sustainable, transparent, and responsible supply chain.

## **7) Risk, Impact, and Dependency Management**

The risks, impacts, and dependencies associated with the matters addressed in this policy are identified, analyzed, and prioritized through the Company's Vanachai Integrated Materiality and Risk Assessment (V-IMRA) process. V-IMRA is an internal assessment framework that considers both impact materiality and financial materiality across the value chain.

- **The results of V-IMRA** are integrated into the Enterprise Risk Management (ERM) system to support policy formulation, strategic decision-making, the setting of risk appetite, and the creation of long-term sustainable value.
- **Risk Identification and Assessment:** The Company conducts corruption risk assessments across all stages of business operations – including procurement, sales, financial management, donations, recruitment, and data management. Specific risk levels and preventive measures are defined to mitigate bribery, abuse of authority, and breaches of business ethics.

- **Impact Assessment:** The Company evaluates the potential impacts of corruption across multiple dimensions, including:
  - Legal and Financial: Exposure to lawsuits, penalties, or financial losses.
  - Reputation and Trust: Loss of confidence among shareholders, investors, and business partners.
  - Social and Environmental: Erosion of transparency within the value chain and unfair or unsustainable use of resources.

The results of these assessments are used to prioritize risks and develop appropriate internal control measures.
- **Dependency Management:** Recognizing the interdependence between organizational transparency and that of its business partners, the Company requires all partner selection and evaluation processes to comply with ethical standards and anti-corruption principles. This ensures that the entire supply chain operates with transparency, accountability, and shared responsibility.
- **Integration into Enterprise Risk Management (ERM):** Findings from corruption risk assessments are incorporated into the Company's overall ERM framework and reported annually to both the Audit Committee and the Sustainability Committee. This ensures continuous monitoring, improvement, and proactive development of the anti-corruption control system.
- **Monitoring and Reporting:** The Company monitors and reports progress on corruption risk management to the relevant committees at least once per year. The results are used to refine control measures, design targeted employee training, and update the policy in response to evolving business and regulatory conditions.  
*(Aligned with FTSE Russell GAC01 – Anti-Bribery and Corruption, GAC07 – Governance Oversight, GRI 205-1, GRI 205-3, and SDG 16 – Peace, Justice and Strong Institutions.)*

## 8) Targets and Metrics

The Company has established clear targets and key performance indicators (KPIs) to continuously monitor and evaluate the effectiveness of its anti-corruption initiatives. These indicators are designed to ensure that performance outcomes are tangible, transparent, and verifiable, covering all three dimensions of anti-corruption management – Prevention, Detection, and Response.

### **Short-Term Goals (Within 1 Year):**

- Ensure that 100% of employees complete annual training on anti-corruption and business ethics.
- Require all departments to conduct annual corruption risk assessments and develop clear, actionable risk management plans.
- Maintain accessible, secure, and well-communicated whistleblowing channels for all relevant stakeholders.

- Review and update all communications and training materials on business ethics annually to ensure relevance and effectiveness.

**Medium and Long-Term Goals** (*Medium-Term Targets 3–5 years and Long-Term Target 5 years and beyond*):

- Achieve zero proven cases of corruption or bribery within the organization.
- Embed a culture of integrity and transparency as part of the Company’s core values and organizational DNA (Core Values Integration).
- Gain industry-wide recognition as a “Transparent and Ethical Organization” known for high standards of governance and accountability.

### Key Performance Indicators (KPIs)

Category	Indicators	Monitoring Frequency	Responsible Unit
<b>Prevention</b>	Percentage of employees who have completed anti-corruption training	Annually	Human Resources Department / Sustainability Development Task Force
<b>Detection</b>	Number of whistleblowing reports received and fully investigated	Quarterly	Internal Audit Unit / Audit Committee
<b>Response</b>	Number of disciplinary actions taken or preventive measures improved following an incident	Annually	Audit Committee / Legal Department
<b>Partnership Integrity</b>	Percentage of business partners assessed for ethics and corruption risk	Annually	Procurement Department / Organizational Development Department
<b>Disclosure Transparency</b>	Disclosure of anti-corruption performance in the Sustainability Report (GRI 205)	Annually	Sustainability Development Task Force

- **Performance Integration:**

- Anti-corruption performance indicators are integrated into the Executive Key Performance Indicators (Executive KPIs) to promote shared accountability and strengthen leadership commitment to ethical and transparent management.
- Performance results are regularly reported to the Audit Committee and the Sustainability Committee to review progress, identify areas for improvement, and ensure the continuous enhancement of the policy’s effectiveness.

*(Aligned with FTSE Russell GAC01 – Anti-Bribery & Corruption, GAC07 – Board Oversight, GRI 205-3, and SDG 16.5 – Substantially reduce corruption and bribery in all their forms.)*

## 9) Supply Chain and Partner Responsibility

- Partner Selection and Evaluation** (*FTSE Russell GAC01, GRI 205-1, SDG 16.5*): The Company selects and evaluates business partners based on key criteria such as ethics, transparency, and good governance, which are integral to the procurement process. High-risk partners are subject to **comprehensive due diligence** covering legal, financial, and business integrity aspects to ensure they are not involved in bribery, money laundering, or other unlawful activities. Partner evaluation results are periodically reviewed to ensure ongoing compliance with ethical and anti-corruption requirements.
- Compliance with the Supplier Code of Conduct** (*FTSE Russell GAC01, GAC07, GRI 205-2, SDG 8.7, SDG 12.6*): All suppliers and business partners are required to comply with the Company's **Business Code of Conduct for Business Partners**, which encompasses business integrity, legal compliance, anti-bribery practices, human rights protection, fair labor management, and environmental stewardship. The Company reserves the right to **audit or request supporting documentation** from partners to verify compliance. In cases of non-compliance or violations, the Company may **suspend or terminate the business relationship** immediately.
- Training and Capacity Building** (*FTSE Russell GAC07, GRI 205-2, SDG 17 – Partnerships for the Goals*): The Company prioritizes developing partners' understanding of governance and ethical business conduct by offering **training and advisory programs** on anti-corruption practices, transparent reporting, and responsible operations. Furthermore, the Company fosters joint development initiatives with partners, such as **sustainable supply chain risk management projects** and the adoption of **digital technologies** to enhance transparency and traceability in procurement processes.
- Auditing and Performance Monitoring** (*FTSE Russell GAC01, GRI 205-3, SDG 16.6*): The Company conducts **regular audits and monitoring** to ensure partner compliance with the Anti-Corruption Policy. These may include **on-site inspections or document-based reviews** to verify data accuracy and transparency. Audit findings are reported to the **Audit Committee**, and where risks or violations are identified, appropriate **Corrective Action Plans** are implemented to ensure resolution and continuous improvement.
- Promoting Ethical Business Networks** (*FTSE Russell GAC07, GRI 102-43 – Stakeholder Engagement, SDG 17 – Partnerships for the Goals*): The Company aims to build a **network of ethical business partners** committed to principles of good governance. It encourages suppliers and stakeholders to join the Company's **Anti-corruption Pledge**, promoting collective industry transparency. The Company also collaborates with **government agencies, trade associations, and international organizations** to support and exchange **best practices** in anti-corruption and ethical business conduct.
- Communication and Reporting** (*FTSE Russell GAC07, GRI 205-3, SDG 16.10 – Access to Information*): The Company **discloses information** regarding anti-corruption activities within its supply chain through **the Annual Vanachai Sustainability Move Report** and other corporate communication channels. This allows stakeholders to monitor progress, provide feedback, and engage transparently in policy improvement. Records of **audits,**

**training programs, and partner assessments** are compiled and reported annually to the Sustainability Committee to inform decision-making and continuous policy enhancement.

## 10) Integration with Corporate Strategy

The Anti-Corruption Policy is a core component of the Company's governance and sustainability strategy, aligned with the corporate vision "Forest | Future | Together – for a Sustainable Living."

- **Forest – Governance and Environmental Responsibility:** The Company operates with transparency across all processes, emphasizing the efficient and ethical use of resources while preventing improper benefits or corrupt practices. Integrity and fairness are promoted throughout the supply chain to strengthen responsible and sustainable business conduct.
- **Future – Innovation and Transparent Management Systems:** The Company develops robust internal control systems, monitoring mechanisms, and digital risk management technologies to elevate transparency and accountability standards. These efforts extend beyond internal operations to include business partners and stakeholders, reinforcing trust and responsible innovation.
- **Together – Building a Culture of Integrity with Stakeholders:** The Company fosters collaboration with employees, communities, government agencies, and business partners to promote a transparent, corruption-free society grounded in ethics. Every employee is encouraged to act as an ethical ambassador, exemplifying honesty and responsibility in their professional conduct.

*(Aligned with FTSE Russell GAC07, GRI 102-43 – Stakeholder Engagement, SDG 16.5, and SDG 17 – Partnerships for the Goals)*

### Integration into Corporate Systems

- **Corporate Sustainability Strategy:** Anti-corruption principles are integrated into all levels of **strategic planning, investment, procurement, human resource management, and operations**, ensuring that all business decisions are based on ethics, legality, and transparency. This policy serves as a key mechanism for advancing **Corporate Governance (CG) and supporting Responsible Business Conduct (RBC)** throughout the organization.

*(Aligned with FTSE Russell GAC07 – Board Oversight and Governance Integration, GRI 205-2, SDG 16.6)*

- **Contribution to the Sustainable Development Goals (SDGs):**

The Anti-Corruption Policy directly supports the Company's commitment to the United Nations Sustainable Development Goals (UN SDGs) through the following:

- **SDG 16:** Peace, Justice, and Strong Institutions
- **SDG 8:** Decent Work and Economic Growth

➤ **SDG 17: Partnerships for the Goals**

The Company regularly monitors and discloses progress through its Annual Sustainability Report, demonstrating transparency, progress, and continued commitment to ethical and sustainable business practices.

*(Aligned with FTSE Russell GAC07, GRI 205-3, SDG 8, SDG 16, and SDG 17)*

## 11) Implementation and Management Tools

- **Integration into Management Systems** *(FTSE Russell GAC07 – Board Oversight, GRI 205-2, SDG 16.6)*: The Company integrates the Anti-Corruption Policy into its corporate management systems, including the Enterprise Risk Management (ERM) framework, Internal Control System, and Sustainability Management System, as well as the Audit Committee’s oversight practices. This ensures that all business units operate under consistent governance and compliance standards.
- **Training and Awareness Programs** *(FTSE Russell GAC02 – Whistleblowing and Awareness, GRI 205-2, SDG 4.7, SDG 16.5)*: The Company organizes training programs and awareness-building activities for employees and management at all levels to promote understanding of stakeholder engagement, business ethics, and transparent communication. These initiatives aim to foster a corporate culture of shared responsibility and integrity.
- **Whistleblowing Channels and Systems** *(FTSE Russell GAC02, GRI 205-3, SDG 16.10 – Access to Information)*: The Company provides multiple secure and confidential whistleblowing channels, such as email, website submission, or written communication to the Audit Committee. These channels allow employees and stakeholders to report suspected misconduct or corruption with confidence. All information received is treated as strictly confidential, and whistleblowers are protected from retaliation, discrimination, or harassment.
- **Auditing and Monitoring** *(FTSE Russell GAC07, GRI 205-3, SDG 16.6)*: The Internal Audit Unit and Audit Committee are responsible for continuously monitoring, reviewing, and evaluating compliance with the Anti-Corruption Policy. Findings and recommendations are reported to the Board of Directors and the Sustainability Committee, ensuring continuous improvement and system enhancement across all levels of the organization.
- **Public Communication and Reporting** *(FTSE Russell GAC07, GRI 205-3, SDG 16.6, SDG 17)*: The Company discloses information on its anti-corruption performance and compliance progress through the Annual Sustainability Report and internal communication platforms. This proactive transparency builds stakeholder confidence and reinforces the Company’s commitment to ethical, responsible, and accountable business operations.

## 12) Monitoring, Reporting and Transparency

- **Monitoring and Evaluation** *(FTSE Russell GAC07 – Board Oversight, GRI 205-3, SDG 16.6)*: The Company ensures regular monitoring and evaluation of its Anti-Corruption Policy

implementation. The Internal Audit Unit and Audit Committee are responsible for reviewing the effectiveness of internal controls, preventive measures, and compliance with legal and regulatory requirements. They also provide recommendations for improvement based on changing business contexts and emerging risks.

- **Reporting to the Board and Management** (FTSE Russell GAC07, GRI 205-3, SDG 16.6): The results of monitoring, audits, and whistleblowing cases are reported to the Audit Committee and the Sustainability Committee at least once a year. These reports support the evaluation of the policy's effectiveness and inform strategic decisions related to corporate governance and ethical business conduct.
- **Public Disclosure** (FTSE Russell GAC07, GRI 102-43 – Stakeholder Engagement, SDG 16.10 – Access to Information): The Company discloses its anti-corruption performance and progress through the Annual Sustainability Report and other public communication channels, such as the corporate website. This transparency enables stakeholders to review and monitor the Company's actions and achievements in preventing corruption.
- **Internal Communication** (FTSE Russell GAC02 – Whistleblowing, GRI 205-2, SDG 16.6): The Company communicates anti-corruption updates, performance outcomes, and policy improvements through internal channels, including the intranet, newsletters, and monthly meetings. These communications aim to enhance employee understanding and engagement in fostering a transparent and integrity-driven organizational culture.
- **Data Verification and Assurance** (FTSE Russell GAC07, GRI 102-56 – External Assurance, SDG 16.6): The Company conducts data verification and assurance of disclosed information through internal audits or independent external auditors. This process ensures the accuracy, completeness, and reliability of governance and anti-corruption data presented in reports and public disclosures.

### 13) Review and Continuous Improvement

- **Policy Review** (FTSE Russell GAC07 – Board Oversight and Governance Integration, GRI 102-33, SDG 16.6): The Company reviews and updates the Anti-Corruption Policy **at least every two years**, or whenever there are changes in laws, regulations, or governance standards. This ensures the policy remains effective, relevant, and responsive to stakeholder expectations and evolving business contexts.
- **System Effectiveness Evaluation** (FTSE Russell GAC01, GRI 205-3, SDG 16.5): The Audit Committee and Internal Audit Unit regularly assess the effectiveness of policy implementation by considering audit findings, identified risks, whistleblowing reports, and disciplinary actions. The results are used to strengthen internal controls and improve risk management processes across the organization.
- **Continuous Improvement** (FTSE Russell GAC07, GRI 205-2, SDG 4.7, SDG 16.6): The Company promotes continuous learning and enhancement of governance management systems by encouraging the adoption of digital tools, transparent communication

practices, and practical training programs. These efforts aim to strengthen employees' capabilities and understanding of anti-corruption measures at all levels.

- **Knowledge Sharing and Best Practices Exchange** (*FTSE Russell GAC07, GRI 102-43, SDG 17 – Partnerships for the Goals*): The Company supports knowledge sharing and exchange of best practices among internal departments, subsidiaries, and business partners. This collaboration fosters mutual learning and helps elevate ethical standards and anti-corruption practices to be consistent with international benchmarks.

#### 14) Anti-corruption Policy Revision History

Version	Date	Policy Owner	Approved by	Key Changes / Comments
1.0	26 February 2025	Sustainability Development Task Force	Board of Directors	Developed the Company's first Anti-corruption Policy to establish a foundational framework for corporate governance and transparency.
2.0	11 November 2025	Sustainability Committee	Board of Directors	Revised the policy to align with FTSE Russell GAC01–GAC07, GRI 205, and SDG 16, incorporating enhanced details on governance oversight, risk assessment, supply chain management, and whistleblowing systems, while integrating it into the Company's strategic framework "Forest   Future   Together – for a Sustainable Living."

This policy is approved and issued for acknowledgement and implementation by all relevant parties.