



Anti-Corruption Policy and Guidelines

3rd Revision (B.E. 2568 /2025)

Policy:

Sritai Superware Public Company Limited “the Company” is firmly committed to conducting its business with integrity, ethics, transparency, and fairness to all stakeholders. The Company places great importance on the prevention of corruption in all forms. The policy applies to the board of directors, executives, and employees of the Company and its subsidiaries, as well as encourages customers, business partners, contractors, and subcontractors involved with the Company to adhere strictly to this policy and guidelines, including relevant rules, regulations and laws of Thailand regarding anti-corruption.

The Company conducts regular reviews of its Anti-Corruption Policy and Guidelines to ensure their continued relevance and effectiveness as a framework for business operations. This is to affirm that the Company has clearly defined responsibilities, procedures, and operational requirements that are appropriate and effective in preventing corruption across all Company activities

1. Definitions:

- Company refers to Sritai Superware Public Company Limited.
- Srithai Group refers to Srithai Superware Public Company Limited and its subsidiaries.
- Directors/Executives/Employees refers to the board of directors, executives at all levels, and employees of Sritai Superware Public Company Limited.
- Policy and Guidelines” refers to the Anti-Corruption Policy and Guidelines.
- Corruption refers to any act or omission in the performance of duties, or the misuse of official power, for personal gain in various forms. This includes giving or receiving bribes, offering or promising to offer, requesting or demanding benefits in the form of money, property, or other benefits unrelated to assets, inappropriately involving government officials, private entities, or others doing business with the Company to induce such individuals to act or refrain from acting in a manner that benefits or creates an unfair advantage for the business, create conflicts of interest or provide other improper business advantages, whether directly or indirectly. This includes the following acts:
 1. Offering, giving, or receiving cash, goods or any services in exchange for bribery to or from relevant persons, with the purpose of:
 - 1.1 Facilitating or expediting business operations or service requests.
 - 1.2 Gaining a competitive advantage over other business competitors, or securing certainty in being awarded a business contract or being selected to supply goods or services.
 - 1.3 Causing unfair procurement or engagement with business partners, suppliers, or contractors as a result of conflicts of interest in procurement and biased decision-making.
 2. Offering, giving, or receiving gifts, presents, or any assistance that is beyond the normal customary practice, even on traditional or charitable occasions.

3. Offering, giving, or receiving a position, job, or shares in any business venture where one can misuse their official position for personal gain.

2. Duties and Responsibilities:

- 2.1 The Board of Directors is responsible for setting policies and overseeing the establishment of an effective anti-corruption system, ensuring that employees at all levels understand and are aware of the importance of anti-corruption efforts, making it part of the Company's corporate culture. The Board also serves as the representative of the Company's image in declaring its commitment and encouraging the Company to join alliances or initiatives against corruption.
- 2.2 The Audit Committee is responsible for reviewing financial reporting, accounting systems, internal controls, internal audit systems, and risk management systems to ensure their appropriateness, effectiveness, and efficiency in detecting irregularities, deficiencies, or indicators that may lead to corruption in a timely manner. The Committee shall also acknowledge, monitor, and consider information from the Whistleblower system in collaboration with the Good Corporate Governance and Sustainable Development Committee.
- 2.3 The Good Corporate Governance and Sustainable Development Committee oversees, provides advice, and ensures compliance with corporate governance policies, business ethics, and this Anti-Corruption Policy and Guidelines. The Committee shall review this Policy and Guidelines as appropriate to ensure alignment with changes in business operations, regulations, rules, and applicable laws. It is also responsible for receiving reports of suspected fraud and corruption involving internal personnel, investigating or establishing an investigation committee, and reporting to the Audit Committee for acknowledgment or joint consideration, as the case may be, before submitting the matter to the Board of Directors for consideration of disciplinary actions or corrective measures.
- 2.4 The Risk Management Sub-Committee is responsible for assessing corruption-related risks, establishing preventive measures, and presenting recommendations to the Audit Committee and the Good Corporate Governance and Sustainable Development Committee for consideration and approval.
- 2.5 The Managing Director, as the highest-ranking executive, together with the Executive Management, is responsible for strictly, consistently, and concretely implementing this Policy and Guidelines in all departments. They shall support the anti-corruption policy, communicate it to all employees and relevant parties, and act as role models for subordinates. They shall also regularly review the appropriateness of practices and measures to ensure their effectiveness and alignment with changes in business operations, regulations, rules, and legal requirements.
- 2.6 The Internal Audit Department is responsible for auditing and reviewing operations to ensure compliance with this Policy and Guidelines, operating procedures, and delegated authority, as well as with applicable laws. The Department shall ensure that the Srithai Group has sound internal control systems and adequate, appropriate practices to prevent or mitigate the risk of fraud and corruption, and shall report the results to the Audit Committee on a quarterly basis.



3. Anti-Corruption Practices:

The Srithai Group does not tolerate any form of corruption, which applies to all business activities both domestically and internationally. The board of directors, executives, and employees of the Srithai Group have the duty and responsibility to comply strictly with this Policy and Guidelines, refraining from involvement in any form of corruption, either directly or indirectly. This includes:

- 3.1 No behavior should be displayed indicating an intention to engage in corruption, including giving or receiving bribes to/from government or private officials or any stakeholders related to the Company, to secure or maintain business advantages, or to benefit personally or on behalf of others.
- 3.2 Employees must not ignore or overlook corruption-related activities involving the Company. It is their duty to report such matters to supervisors or responsible departments, and to cooperate in fact-finding investigations.
- 3.3 The Company undertakes to treat fairly and protect individuals who refuse to participate in fraud or corruption, or who report, submit evidence, or provide information about behaviors or incidents that may lead to fraud or corruption, in accordance with the Company's Whistleblower Protection Measures. This also applies to individuals who cooperate in reporting, investigating, or expanding the scope of examinations into fraud or corruption.
- 3.4 Any employee proven to have committed or been involved in fraud or corruption regardless of whether or not they have gained any benefit will be subject to disciplinary action under the Company's Employee Discipline Regulations, and may also face legal penalties if the act is unlawful.
- 3.5 The Company has a policy of not demoting, penalizing, or retaliating against employees who refuse to engage in corruption, even if such actions may result in business losses for the Company.
- 3.6 The Company places importance on The Company places great importance on communicating, disseminating knowledge, and ensuring understanding among all parties involved in any of the Company's business activities regarding compliance with this Policy and Guidelines, as well as the potential impacts on the Company and all stakeholders involved.
- 3.7 The Company ensures there are sufficient and appropriate internal controls and audit processes, overseen by the Audit Committee, to prevent and detect corruption-related activities.
- 3.8 The Company ensures that its human resource management processes reflect its commitment to anti-corruption practices, including recruitment, training, performance evaluations, compensation, and promotions.
- 3.9 The Company may consider granting recognition or rewards to employees who provide information, report, or submit useful evidence that leads to the detection, prevention, or deterrence of fraud or corruption, in order to foster a sense of shared responsibility in protecting the Company's interests and reputation.



3.10 To ensure clarity in handling matters with a high risk of fraud or corruption, it is stipulated that all Directors, executives, and employees at all levels of the Company carry out their duties with caution in the following matters.

3.10.1 Political Contributions

This refers to providing financial support, goods, and/or participating in activities, as well as encouraging employees to engage in political activities on behalf of the Company to gain business or commercial advantages.

The Company is committed to political neutrality and has a policy of not providing direct or indirect political support to political parties, party officials, election candidates, or organizations or individuals involved in politics, to prevent the use of such support for bribery purposes. Additionally, the Company does not permit executives or employees to engage in any political activities during their tenure with the company, nor does it allow the use of company resources for such purposes. The following guidelines are established to govern these practices.

- 1) The Company does not support or contribute financial or material resources to any political party, candidate, or election campaign for business advantage.
- 2) Employees have the right and freedom to participate in political activities under the provisions of the Constitution. However, they must not falsely claim to represent the company or use any company property, equipment, or resources for political purposes. If participating in political activities, employees must exercise caution to ensure that their actions do not create the impression that the company supports or is aligned with any particular political party.

3.9.2 Charitable Donations and Financial Support

The Company may make charitable donations or provide financial support as part of its corporate social responsibility activities, aimed at promoting and enhancing the Company's positive image. These donations should not be made with the expectation of receiving business returns. Such activities may include providing education, supporting cultural activities, social and environmental initiatives, and supporting educational and sports programs. The following guidelines are established for these practices.

1) Charitable Donations in Cash or Company Assets

Charitable donations must be made on behalf of the Company only. The recipients of the donations should be foundations, charitable organizations, temples, hospitals, healthcare facilities, or organizations that operate for the benefit of society, which are certified or credible and can be verified.

Charitable donations or support, whether in the form of money, assets, or activities/projects for charitable causes, must be carried out transparently and in compliance with the law. The name of the donor or the entity making the donation should be listed as "the Company" only, and the payment must go through the company's approval process as specified in the Company's regulations.

2) Charitable Donations in Personal Capacity

Directors, executives, and all employees may donate cash or assets in their personal capacity. However, such donations must not be associated with or raise suspicions of



misconduct, including bribery, corruption, or any unethical intentions that could harm the Company's integrity.

3.9.3 Gifts and Entertainment Expenses

The Company acknowledges the importance of maintaining good business relationships. However, the giving and receiving of gifts, hospitality, or entertainment must follow clear guidelines to avoid corruption risks:

- 1) The type of gift or entertainment, including its value, must be appropriate for the situation or in accordance with customary practices for specific occasions or festivals.
- 2) It must not be an act of coercion, inducement, or providing a reward to any individual to engage in inappropriate actions in order to gain an advantage or provide assistance or benefits to the Company or creating a conflict of interest or biased decision-making.
- 3) It must be given on behalf of the company, not on behalf of directors, executives, or employees, and must be conducted transparently.
- 4) It must comply with the Company's rules and regulations.

3.10.4 Facilitation Payments

Facilitation payments refer to any monetary or non-monetary expenditures made informally to public officials to ensure that they carry out actions in accordance with the process, or to expedite such actions. These processes do not require the discretion of the public official but are based on the proper performance of their official duties and the rights that any individual is entitled to under applicable law.

The Company has a strict policy of not making facilitation payments in any form, whether directly or indirectly. The Company will neither engage in nor accept any action in exchange for facilitating business operations. However, legally sanctioned expedited processes that are available to all individuals (e.g., fast-track lanes at airports, expedited visa or passport services) are acceptable, provided that no payment is made directly to any specific individual. Fees paid under such legitimate expedited processes shall not be considered facilitation payments.

3.10.5 Hiring of Government Officials

Government officials refer to political officeholders, civil servants, or local employees with permanent positions or salaries; employees or personnel working in state enterprises or government agencies; local executives; and members of local councils who are not political officeholders; officials under local administrative law. This definition also includes directors, subcommittees, employees of government agencies, state enterprises, or government bodies, and any individual or group authorized or assigned to exercise administrative powers under the law, whether established within the civil service, state enterprises, or other government-related entities. The operational guidelines regarding the engagement of government officials are as follows:

- 1) Do not hire or appoint government officials who are currently holding office, except in the case of state enterprises where the establishing agency's regulations allow representatives from government agencies to perform duties within the Company.

- 2) Establish a cooling-off period of 2 years for the appointment of former government officials who have left their positions, or individuals who have previously worked for regulatory agencies directly related to the Company.
- 3) The Company shall conduct due diligence on individuals being recruited or appointed as directors, advisors, or executives to identify any potential conflicts of interest prior to appointment.
- 4) The aforementioned government officials are prohibited from exercising their authority improperly, particularly in situations involving conflicts of interest, such as disclosing confidential information of the government agency in which they currently serve or previously served, attempting to influence decision-makers through improper allocation of benefits, or being assigned to interact with their former government agency.
- 5) Disclose the names and background information of former government officials appointed as advisors, directors, or executives, along with the rationale for their appointment, in the Company's public documents to ensure transparency in the appointment process.

3.10.6 Business Relationships and Procurement with Government Agencies

The giving or receiving of bribes in any business process is strictly prohibited. All interactions or coordination with government agencies must be conducted with transparency, honesty, and integrity, and in strict compliance with applicable laws and regulations.

3.10.7 Conflicts of Interest

A conflict of interest refers to any action that may cause an individual in a responsible position to perform duties, make decisions, give instructions, approve, or authorize in a manner that is not impartial, biased, or deviates from what a reasonable person would decide or from proper practice, for personal gain, and which adversely affects the interests of the agency or organization.

The Company's policy is to prioritize the best interests of the Company. All activities or actions must not involve or create conflicts of personal interest for directors, executives, employees, as well as customers, business partners, and competitors. The guidelines for practice are as follows:

4. Measures and Channels for Reporting Whistleblowing or Complaints

The Company has established measures to address reports or complaints related to legal violations, business ethics, or behavior that may indicate corruption or misconduct. The Company provides multiple communication channels to enable employees and stakeholders to report concerns or complaints conveniently and appropriately. These reports can be submitted through the designated channels as follows:

- 4.1 Via the complaint channel (Whistleblower) on the Company's website, of which the complainer can choose to send the information to an independent director or all of them comprising

Mr. Enghug Nontikarn: enghug_non@srithaisuperware.com

Mr. Suchat Boonbanjerd Sri: suchat_boo@srithaisuperware.com

Mr. Supachok Liamkaew: supachok_liam@srithaisuperware.com

Ms. Siriporn Sailasoot: siriporn_sai@srithaisuperware.com



4.2 Via Direct letter to independent director by specifying the name of the independent director and the address of Srithai Superware Public Company Limited, 15 Suksawat Road, Soi 36, Bangpakok, Rat Burana, Bangkok 10140, Thailand or P.O. Box 84, Ras Burana District, Bangkok 10140, Thailand.

The whistleblower is not required to disclose their identity when making a complaint or reporting a tip. However, if the identity is disclosed, it will enable the company to ask for further details or provide feedback on the outcome of the investigation.

The Company will keep the name, address, or any information that could identify the whistleblower or informant confidential, safeguarding the identity of the whistleblower and informant. Access to this information will be restricted solely to individuals with the responsibility for investigating the complaint.

The Company has designated the Secretary of the Investigation Committee, appointed to investigate and determine the facts, as responsible for maintaining the confidentiality of the information, complaints, and evidence provided by the whistleblower and informant. The information will not be disclosed to anyone not involved in the process, except when disclosure is required by law. The Company will also implement protective measures for whistleblowers, complainants, witnesses, and individuals providing information during the investigation, ensuring they do not face retaliation, harm, or any unjust treatment arising from their whistleblowing or complaint.

Whistleblowers or individuals reporting cases of fraud or corruption shall be afforded protection as stipulated by the Company.

5. Investigation Process and Penalties

- 5.1 The Company will appoint an Investigation Committee to examine corruption allegations. This committee will conduct fact-finding investigations and provide periodic updates to the whistleblower (if identity is disclosed). The findings will be reported to the Good Corporate Governance and Sustainable Development Committee for further consideration.
- 5.2 If the investigation reveals that the information or evidence provides reasonable grounds to believe that the accused has committed corruption or fraudulent activities, the company will grant the accused the right to be informed of the allegations and to defend themselves by providing additional information or evidence that demonstrates their lack of involvement in the alleged corrupt activities.
- 5.3 If the investigation confirms corruption, the individual responsible whether a director, executive, or employee will face disciplinary action under this Policy and Guidelines and the Company's Code of Conduct. If the act violates the law, legal action will also be taken accordingly.

6. Training and Communication

- 6.1 The Company provides communication and dissemination this Policy and Guidelines, including channels for reporting whistleblowing or complaints, to internal personnel via various methods, such as new employee orientations, training sessions, seminars, bulletin boards, Information Systems, emails, and the Company's website and other channels. This communication also extends



to employees within Srithai Group to ensure that all individuals understand and are fully aware of their duties and responsibilities in strict compliance with this Policy and Guidelines.

- 6.2 The Company communicates and disseminates this Policy and Guidelines, including channels for reporting clues or complaints, to external parties, the public, subsidiaries, joint ventures, business partners, and stakeholders via various channels, such as the Company's website, annual reports, and SEC filings. This is to foster understanding and encourage adherence to the standards of social and national responsibility in the collective fight against corruption, in alignment with the Company's commitment.

7. Review of the Policy and Guidelines

The Good Corporate Governance and Sustainable Development Committee shall review the Policy and Guidelines as deemed appropriate to ensure alignment with and responsiveness to changes in business operations, regulations, rules, and applicable laws, prior to seeking approval from the Board of Directors.

This Policy & Guidelines was approved in the Board of Directors Meeting No. 4/2568, on August 11, 2025.

-- Mr. Sanan Angubonkul --

(Mr. Sanan Angubolkul)
Chairman