

Anti-Corruption Policy

AddTech Hub Public Company Limited (the “Company”) realizes the importance of management and business operations under the principles of good corporate governance by adhering to the principle of operating the business with honesty, transparency, fairness, accountability, and prudence, in strict compliance with the relevant laws, regulations, and standards of Thailand, to demonstrate our intent and commitment against all forms of corruption.

The Company has established an Anti-Corruption Policy which “prohibits directors, executives, employees, and subsidiaries from engaging in any acts that may involve corruption in any form, whether for the direct or indirect benefit of themselves, their families, close associates, or any stakeholder groups, both domestically and internationally.” Furthermore, the Company has structured its organization with clear segregations of duties, operational workflows, and lines of command within each department to ensure an appropriate system of checks and balances and rigorous internal controls.

1. Definitions

Corruption refers to actions or omissions in performance of duties or exercising powers under the duty wrongfully to seek unduly benefits in various forms whether giving or accepting bribes, offering, promising to offer, requesting or demanding money, properties or any other benefits that are unsuitable for government officials, government agencies, private entities or any other person who conducts business with the Company in order for such person to perform or refrain from performing duties for the purpose of obtaining a business or for any other improper business benefits, except where it is permitted by laws, rules, announcements, regulations, local customs or trade customs.

Bribery refers to the offering, giving, or receiving of money, assets, gifts, or any other benefits to oneself, or from a person seeking to influence actions that are dishonest, illegal, or in violation of the Company’s code of ethics.

Giving or Receiving Gifts refers to any items, privileges, or other benefits given or received on various occasions in accordance with custom, tradition, or culture, provided as an act of goodwill, assistance, or tokens of appreciation.

Hospitality and Entertainment refers to providing food, beverages, or any services—including entertainment, sports, or recreational activities—to build good business relationships or, on certain occasions, as an expression of social etiquette. However, these expenses may be considered bribes if they are provided to induce a government official to perform an act in violation of their official duties.

Giving or Receiving Sponsorships refers to the giving or receiving of money, assets, or other benefits to support, promote, and publicize business activities, which positively contributes to the corporate image of the Company.

Donations refers to the contribution of money, assets, or items to agencies or organizations operating for the public benefit. Such donations aim to provide public relief and support activities beneficial to society as part of corporate social responsibility (CSR) initiatives.

Giving Items or Other Benefits refers to granting special privileges in the form of money, assets, items, or other benefits as a token of appreciation, a reward, or to foster good relationships.

Political Contributions refers to assistance provided in the name of the Company through money, items, or other benefits to support or benefit political parties, politicians, or political activities. This does not include employees participating in political activities in accordance with their personal rights and freedoms as prescribed by law. However, employees must not engage in any actions that cause the Company to lose its political neutrality or suffer damages due to political involvement.

Conflict of Interest refers to a clash between personal interests and the public or corporate interest, involving the unlawful pursuit of benefits through the misuse of one's position, authority, or confidential company information, or through exercising improper discretion that lacks morality, transparency, fairness, and independence.

Facilitation Payments refers to small, unofficial payments made to government officials as a form of gratuity whether in money, assets, or non-monetary benefits—to expedite routine, lawful processes and procedures related to the Company's business activities.

Government Officials / Public Servants refers to individuals who are or were government officials, politicians, or advisors to state agencies, who have joined a private company and may utilize their relationships or inside information to benefit that private company. This may lead to a conflict of interest and negatively impact the image, credibility, integrity, and impartiality of regulatory oversight.

2. Duties and responsibilities

2.1 **The Board of Directors** is responsible for formulating policies and supervising the implementation of an effective anti-corruption support system so that all employees in the Company understand and realize the importance of anti-corruption and cultivate it as a corporate culture.

2.2 **The Audit Committee** is responsible for reviewing financial and accounting reports, internal control systems, internal audit systems and risk management systems and ensuring the appropriateness and efficiency, as well as receiving the whistleblowing of corruption which arises from people in

the organization, being involved in the investigation of facts and submitting the matter to the Board of Directors to jointly consider punishing or finding solutions to such problems.

- 2.3 **The Sustainability Management Team** is responsible for overseeing, advising and monitoring compliance with the Corporate Governance Policy, Code of Conduct and Anti-Corruption Policy.
- 2.4 **The Risk Management Team** is responsible for conducting an assessment of risks associated with corruption as well as establishing measures and guidelines to prevent corruption risks to propose to the Audit Committee and the Sustainability Management Team.
- 2.5 **Internal Auditor** is responsible for auditing and reviewing operations to ensure they are executed correctly and in alignment with policies, guidelines, delegation of authority, procedures, laws, and regulatory requirements. This is to ensure that the internal control systems are appropriate and adequate against potential corruption risks within operational processes, in accordance with the audit plan approved by the Audit Committee.
- 2.6 **The Executive Committee and Chief Executive Officer** are responsible for implementing the Anti-Corruption Policy by establishing a system to support the Anti-Corruption Policy and communicate it to all employees and related parties including reviewing the appropriateness of systems, policies and measures to comply with changes in business, rules, regulations and legal requirements.
- 2.7 **Executives and Employees** have a duty to strictly comply with the guidelines set forth in this policy. In the event of witnessing any act that violates this policy, they must promptly report it to their superior or through the reporting channels designated under this policy.

3. Anti-Corruption Policy Guidelines

The Board of Directors, executives, employees, and companies within AddTech Hub Public Company Limited group must strictly adhere to the Anti-Corruption Policy and must refrain from getting involved in all forms of corruption, both directly or indirectly, as follows:

- 3.1 Do not engage in any behavior that expresses the intent of corruption, giving or accepting bribes to government and private officials, or stakeholders associated with the Company in order to obtain or maintain a business or competitive advantage or for the benefit of oneself and those involved.
- 3.2 Do not ignore or neglect when seeing actions deemed as corruption which are related to the Company. It is considered a duty to notify the supervisor or responsible person and cooperate in the investigation of facts.

- 3.3 The Company will provide fairness and protection to persons who refuse corruption or report corruption clues to the Company as stipulated in the measures to protect complainants or those who cooperate in reporting corruption.
- 3.4 Those who commit corruption, which is an unethical conduct, will be subject to disciplinary action in accordance with the regulations set by the Company and may be subject to legal penalties if such actions are illegal.
- 3.5 The Company recognizes the importance of disseminating knowledge and fostering understanding among individuals whose duties are related to or may impact the Company regarding compliance with this Anti-Corruption Policy. Consequently, the Company provides policy communication including whistleblowing and complaint-handling procedures through a variety of channels, such as orientation programs for new employees, ongoing seminars or training sessions, and internal information on the intranet. This ensures that directors, executives, and employees are fully aware of and confidently implement these measures in practice.
- 3.6 The Company has established appropriate and efficient audit processes and internal control systems on an ongoing basis to prevent corruption and for operational efficiency and to reduce risks from the nature of the business. An appropriate internal control system consists of both preventive control and detective control, which are tools that help to reduce the likelihood and incentives for wrongdoing and corruption, where there are criteria for separating work duties. In addition, there is a follow-up evaluation process whereby management is promptly reported and informed of the causes of defects or unusual circumstances as well as being able to appropriately improve the system in a preventive manner in evaluating the said internal control system, the process of which the Internal Audit Department is a crucial part.
- 3.7 The Company provides a human resource management process that reflects the Company's commitment to anti-corruption measures from recruitment, training, performance evaluation, compensation and promotion.
- 3.8 In order to clarify the operation in matters that pose a high risk of corruption, the Company directors, executives, and employees at all levels of the Group must perform their duties with caution in the following matters:
- (1) The giving or receiving of gifts and entertainment must be carried out in a manner that is transparent, lawful, in accordance with the general trade customs or traditions at reasonable value.

- (2) Giving or receiving donations or sponsorships must be carried out in a manner that is transparent and lawful, ensuring that the giving or receiving of such donations or sponsorships does not mask bribery.
- (3) The business operations, dealings, negotiations, bidding and other actions with government or private entities must be carried out in a transparent and lawful manner. In addition, directors, executives and employees of the Group must not give or accept bribes at all stages of business operations.

4. Other Policies Supporting Anti-Corruption Measures

4.1 Political Contributions

The Company has a policy to conduct its business with neutrality. "Political neutrality" means not favoring or aligning with any specific political party or politician. The Company will not provide funds or any form of assistance, directly or indirectly, to any political party for the purpose of securing business advantages, which would constitute political contributions.

4.2 Giving or Receiving Gifts, Entertainment, Hospitality, and Other Expenses

The Company permits the giving or receiving of gifts and entertainment with external individuals or entities with whom it has a business relationship, provided it is done to foster goodwill and conforms to business and commercial customs. Involved executives and employees must consider the appropriateness of the format of the gift or entertainment, and such actions must not damage the Company's corporate image.

The giving or receiving of gifts, entertainment, and hospitality must be carried out transparently and accountably. Therefore, the Company has established principles and guidelines for executives and relevant employees to strictly adhere to regarding external individuals or organizations related to business operations, as follows:

Principles for Giving or Receiving Gifts, Entertainment, Hospitality, and Other Expenses

- (1) The giving or receiving of gifts must conform to general business and commercial customs for customers, business partners, or persons with commercial relationships who visit the Company, etc.
- (2) The individuals receiving gifts, entertainment, or hospitality must not be employees of the Company, unless such employees are officially assigned to take care of and entertain those customers or business partners.

- (3) Employees are strictly prohibited from demanding or taking any action that implies or leads customers, business partners, or relevant parties to understand that they are required to provide gifts of any kind.
- (4) The approval of reimbursement for entertainment expenses must strictly be approved by an authorized person in accordance with the Company's Limit of Authority (DOA) table.
- (5) Budget allocations for gifts and entertainment expenses must be clearly defined.
- (6) Valid receipts or evidence of payment for entertainment and gifts must be attached to support the reimbursement claim.

Guidelines for Giving or Receiving Gifts

- (1) Giving Gifts: Gifts must be approved by an authorized person according to the Limit of Authority table and carried out in accordance with Company regulations every time. Company procurement and disbursement procedures must be strictly followed.
- (2) Receiving Gifts: Upon receiving a gift, it must be forwarded to the Human Resources Department or a designated person to compile and present to the Chief Executive Officer (CEO). A clear gift registry must be maintained to allocate the gifts for appropriate charitable donations. In the case of perishable items (such as food, snacks, or fresh goods), they should be returned to the receiving department for internal distribution within the unit.

Guidelines for Entertainment, Hospitality, and Other Expenses

- (1) In cases where entertainment must be received or provided, the host or the representative hosting the event is prohibited from receiving or providing entertainment if it falls under any of the following conditions:
 - It violates Company rules, regulations, orders, policies, or any laws.
 - It is excessively luxurious or wasteful, supports political activities, or causes damage to the Company's reputation.
 - It constitutes corruption or bribery (to buy future business opportunities).
 - It is obscene or indecent in nature.
- (2) The maximum value of entertainment per occasion for the hosting representative is categorized clearly by position as follows:
 - Chief Officer level and above: Not exceeding THB 50,000 per occasion.
 - Manager level: Not exceeding THB 20,000 per occasion.

- Below Manager level: Not exceeding THB 5,000 per occasion.

(3) If the entertainment expense per occasion exceeds the specified limit, the hosting representative must obtain prior written approval from the next higher-ranking authority before the event takes place.

(4) The Company representative hosting the entertainment and the guests being entertained must remain present until the conclusion of the event.

4.3 Sponsorships

Sponsorships are a form of business public relations channel, which differs from charitable donations. They may be conducted for business, branding, or corporate reputation purposes. However, they carry risks as they involve payments for services or benefits that are difficult to measure and monitor. Sponsorships can also be linked to bribery. Therefore, the Company has established the following criteria for controlling sponsorships:

(1) It must be proven that the applicant for sponsorship has actually carried out the project activities, and that the sponsorship supports the project's objectives to achieve real success and benefit society, or aligns with Corporate Social Responsibility (CSR) objectives.

(2) It must be proven that providing the sponsorship or any other quantifiable benefit (such as accommodation and food) does not involve reciprocal benefits for any individual or organization, except for standard business recognitions/accolades.

(3) To act as a sponsor, a request memo must be prepared stating the name of the recipient and the purpose of the sponsorship, attached with all supporting documents, and submitted to the authorized person for approval in accordance with the Company's level of authority.

4.4 Charitable Donations

Charitable donations involve giving money, assets, or items without tangible returns, which could potentially be used as a pretext or a channel for corruption. Therefore, to ensure that charitable donations do not have hidden agendas or raise suspicions, the Company has established the following guiding principles and practices:

(1) It must be proven that the charitable project actually exists and operates to support the project's success. It must support community and social development to improve quality of life, strengthen local economies, and generate genuine societal benefits, backed by clear documentary evidence in accordance with Company regulations.

- (2) It must be proven that the donation does not involve reciprocal benefits to any specific individual or entity, except for public relations to build corporate reputation according to standard practices (e.g., displaying the corporate logo or announcing the Company's name at the venue or in other PR media).

The Company will exercise extreme caution regarding donations made at the request, suggestion, or recommendation of government officials or business partners. This is because donations to such organizations may be construed as indirect bribery to secure or retain business contracts, government permits, or unfair business advantages.

4.5 Conflicts of Interest

The Company considers it an essential policy that Directors, Executives, and connected persons must not use opportunities arising from their positions to seek personal gains. Therefore, the following rules have been established:

- (1) Avoid entering into transactions related to oneself that may cause a conflict of interest with the Company.
- (2) In cases where a transaction is necessary for the benefit of the Company, it must be conducted on an arm's length basis (as if trading with an external party). Directors, Executives, or connected persons who have a vested interest in that transaction must not participate in the review and approval process.
- (3) Any commercial transaction made under the same conditions that a person of ordinary prudence would make with a general counterparty in the same situation utilizing commercial bargaining power free from the influence of one's status as a Director, Executive, or connected person—must seek principle and monetary limit approvals in accordance with the Company's Connected Transaction regulations.

4.6 Facilitation Payments

The Company has a strict policy prohibiting the payment of facilitation fees in any form, whether directly or indirectly, to government officials or private sector employees. The Company will not take any action, nor tolerate any action, in exchange for facilitating business operations.

4.7 Hiring of Government Employees

The Company has a policy regarding the hiring of current or former government employees or public officials to hold positions as Directors, Executives, employees, or consultants. The selection, hiring approval, and compensation determination processes must strictly comply with Internal Control and Human Resources procedures. This ensures that the hiring of such individuals is not a reward for securing advantages

for the Company and does not damage the credibility and integrity of public duty, which poses a corruption risk. The Company has established the principles and guidelines as follows:

- (1) The Company implements a background check process for individuals being recruited as Directors, Executives, or employees. Potential conflicts of interest must be thoroughly reviewed prior to appointment or employment, in compliance with Company regulations.
- (2) The approval of employment and compensation for hiring government employees or public officials for positions at the Executive level and above must be carefully reviewed and justified according to Company regulations.
- (3) The approval to recruit and set compensation for a government employee or public official to serve as a Company Director must be carefully reviewed and justified by the Nomination and Remuneration Committee before being proposed to the Board of Directors or shareholders for approval.
- (4) Appointing or hiring individuals who have left public office—where the Company’s business falls under the regulatory oversight of the government agency they previously belonged to—is permitted only if such employment is not prohibited by the laws, rules, or regulations of that agency.
- (5) The Company will transparently disclose information regarding the hiring of government employees or public officials in the Company's Annual Registration Statement/Annual Report (Form 56-1 One Report), if applicable.

4.8 Procurement

- (1) The Company mandates a standard operating work instruction for the procurement process to serve as a guideline and measure for purchasing, vendor selection, and evaluation, ensuring transparency and preventing corruption.
- (2) The Company maintains a clear contracting process for procurement, which includes anti-corruption clauses strictly prohibiting suppliers from giving, offering, or promising to give assets, benefits, or any sum of money to the Company's executives, employees, staff, representatives, or consultants.
- (3) The Company consistently communicates its Anti-Corruption Policy and business ethics guidelines to suppliers to foster and promote anti-corruption alliances in line with Company policies.

5. Measures and channels for whistleblowing or submitting complaints

The Company provides measures for whistleblowing or complaints regarding illegal actions, violations of the Code of Conduct or behaviors that may imply corruption of directors, executives or employees of the Group. Various communication channels have been established to allow employees and stakeholders to report clues or complaints to the Company conveniently and appropriately. The whistleblower or the complainant must specify the details of the matters of which clues and complaints they are submitting along with their names, addresses and telephone numbers that are reachable to the communication channels specified by the Company.

5.1 Channels for receiving whistleblowing or corruption complaints

- By E-mail to Audit Committee: audit.committee@addtechhub.com
- Via Company's website: www.addtechhub.com

5.2 Measures to protect and maintain confidentiality

In order to protect the rights of complainants and informants acting in good faith, the Company will conceal names, addresses or any information that can identify the complainants or informants and keep the information of the complainants and informants confidential. Such information will be accessible only to those who are responsible for investigating complaints.

In the event of corruption complaints on executives, the Audit Committee will be responsible to protect whistleblowers or complainants, witnesses and persons who provide information in the investigation of the facts from any suffering, harm or injustice arising from whistleblowing, complaints, witnessing or providing information.

Persons responsible for the performance of duties related to complaints are responsible for keeping information, complaints and documentary evidence of complainants and informants confidential. It is prohibited to disclose information to persons whose duties are unrelated, unless the disclosure is required by duty as stipulated by law.

6. Investigation procedures and penalties

6.1 Upon receipt of a whistleblowing, the Audit Committee will assign an internal auditor or appoint a fact investigation committee to moderate the investigation and notify the investigation results to the whistleblower or the complainant periodically.

6.2 If the investigation reveals that the information or evidence obtained gives reasonable grounds to believe that the alleged person was actually involved in corruption, the Company will grant the accused person the right to be informed of the allegations and to defend themselves by providing

additional information or evidence demonstrating that they were not involved in the alleged corruption.

- 6.3 If the accused was actually engaged in the act of corruption, whether the person is a director, executive or employee, he or she is considered to have violated the Company's Anti-Corruption Policy and Code of Conduct and will be subject to disciplinary action according to the regulations set by the Company. If the act of corruption is against the law, the offender may be subject to legal penalties as well. In this regard, the disciplinary action according to the Company's regulations and the decision of the Audit Committee are deemed final.

The Company has no policy of demoting, penalizing or negatively affecting employees who reject corruption, even if doing so would cost the Company a business opportunity.

7. Training and communication

- 7.1 The Company arranges to provide communication and dissemination of Anti-Corruption Policy, including channels for whistleblowing or complaints to personnel within the Company for acknowledgement through various channels such as orientation for new directors and employees, posting announcements in public relations boards, e-mails or Company websites, in order for everyone in the Company to understand, agree and abide by the Anti-Corruption Policy seriously.
- 7.2 The Company communicates and disseminates Anti-Corruption Policy including whistleblowing or complaint channels to the public, subsidiaries, associates, as well as business representatives, related business partners and stakeholders through channels such as the Company website, Annual Report and Annual Registration Statement, to create understanding and promote compliance with social responsibility standards for anti-corruption in the same manner as the Company.

8. Penalties

Directors, Executives, and employees who violate the Anti-Corruption Policy will be subject to disciplinary action in accordance with the Company's established regulations. Furthermore, they may face legal penalties if the violation constitutes a breach of applicable laws.

9. Review, Audit, and Improvement

The Company will review, audit, and update the measures under the Anti-Corruption Policy at least once a year. This ensures that the policy remains appropriate, up-to-date, and aligned with changes in business operations, as well as the statutory requirements, rules, and regulations in force at any given time.

This Anti-Corruption Policy has been considered and approved by the Board of Directors' Meeting No. 3/2026 on 13 May 2026 and is effective immediately.