

Anti-Corruption Policy

PrukSA Holding Public Company Limited and its Subsidiaries

Anti-Corruption Policy

1. Introduction

Pruksa Holding Public Company Limited and its subsidiaries (the “**Company**”) recognize that corruption undermines and impedes the nation’s social and economic development. It constitutes unethical conduct that fosters business injustice, erodes ethical standards, weakens competitiveness, and damages the Company’s reputation both nationally and internationally. Such misconduct can also diminish the confidence of shareholders, investors, and other stakeholders in the Company. Accordingly, the Company strictly adheres to Thailand’s anti-corruption laws. This Policy serves as a fundamental guideline for conducting business without supporting any enterprise, group, or individual engaged in the pursuit of unjust benefits through the abuse of authority, whether directly or indirectly.

2. Objective

This Anti-Corruption Policy serves as a guiding framework for all directors, executives, and employees at every level to perform their duties with integrity, free from corruption and the abuse of official position for undue personal gain. This Policy is therefore fundamental to safeguarding and enhancing the Company’s reputation.

3. Definition

Company	means	Pruksa Holding Public Company Limited and its subsidiaries.
Corruption	means	the abuse of power or position for improper gain, including the giving or receiving of bribes in any form. This includes offering, promising, requesting, soliciting, giving, or accepting money, property, or any other benefit whether directly or indirectly to or from a government official, government agency, private entity, or any individual with decision-making authority, with the intent to improperly influence actions or omissions, or to obtain or retain an unfair business advantage.
Political Contributions	means	contributions made in the name of the Company, whether financial or in any other form, to support political activities. Financial contributions may include loans and various forms of in-kind support, such as the provision of goods or services, advertising or promotional activities for political parties, the purchase of tickets for fundraising events, or donations to organizations

closely affiliated with political parties. Such activities are strictly prohibited, except where permitted by law in support of democratic processes.

Bribery	means	offering or providing anything of value or other forms of benefit to government authorities or individuals/groups with the intent to improperly influence their decisions whether to act or refrain from acting in their official capacity, regardless of whether such actions fall within the scope of their lawful duties for personal gain or for the benefit of the Company.
Gift / Gratuity	means	any item of value such as goods or services offered, given, or received directly or indirectly. This includes preferential pricing on purchases or sales, as well as the payment of expenses related to services, such as travel or accommodation.
Whistleblowing	means	the act of reporting to the Company any conduct that may constitute, or be suspected of constituting, misconduct or wrongdoing arising from non-compliance with applicable laws, anti-corruption regulations, or the Company's Code of Conduct.
Whistleblower	means	Directors, Executives, Employee, Stakeholder including internal or external personnel.
Director	means	a director of the Company
Management	means	Chief of Group Executive Officer / Managing Director / Executive Vice President / Senior Vice President / Vice President / Associate Vice President / Senior Manager / Manager / Assistant Manager / Senior Supervisors / Supervisor II / Supervisor I of the Company.
Employee	means	individuals employed by the Company on a monthly, daily, or fixed-term contractual basis with agreed compensation, including any person acting on behalf of the Company.
Business Agent	means	any juristic person or natural person who is not a Company employee but is engaged or authorized by the Company to conduct transactions or liaise with third parties on its behalf.
Customers	means	buyers/service users of the Company.

Business Partner	means	any individual or entity that engages in transactions with the Company to support or promote its business operations, including suppliers, brokers, and service providers.
Relative	means	a person who has a de facto relationship by blood or by legal status, such as parents, siblings, spouse, either on de facto or legal status, including spouses of one's children.
Charitable contributions or public donation	means	donation of money, goods, or other benefits made for public benefit, with assurance that such contributions will not be used as a form of compensation or bribery.
Contribution and grants	means	funds disbursed with the objective of supporting the Company's brand image, or corporate reputation.
Facilitation payment	means	informal or unofficial payments made to government officials to expedite routine administrative procedures or to accelerate actions that the officials are already required to perform as part of their official duties.
Revolving Door	means	hiring of individuals from the public sector into private sector roles in a manner that poses a risk of corruption. This situation may lead to conflicts of interest due to the individual's involvement in both organizations and may compromise the neutrality and integrity of official duties.
Entertainment	means	hospitality, including meals, beverages, banquets, and recreational activities such as festivals and sports events.
Conflict of Interest	means	a situation in which an individual's personal interests wrongfully conflict with the common interests. Such conflicts may result in the misuse of authority, biased decision-making, or actions that undermine ethical conduct, transparency, fairness, and independence in the performance of duties.
Nominee	means	a person or legal entity appointed to act on behalf of the actual owner, where the real owner retains the right to the benefits.
Other benefits	means	other benefits not expressly specified in this Policy.

4. Roles, Duties and Responsibilities

To ensure clarity and effective implementation of the Company's anti-corruption policies and measures, the roles, duties, and responsibilities of all relevant parties are defined as follows.

4.1 Board of Directors

- 4.1.1 To establish, approve, and uphold the anti-corruption policy and measures.
- 4.1.2 To approve and review the implementation of the Anti-Corruption Policy.
- 4.1.3 To ensure that an effective system is in place to support anti-corruption practices and to oversee the enforcement of the policy throughout the organization.

4.2 Audit Committee

- 4.2.1 To ensure that the Company has sufficient internal audit.
- 4.2.2 To ensure that the Company perfectly complies with the anti-corruption policy and measures.

4.3 Chairman of the Executive Committee and Group Chief Executive Officer

- 4.3.1 To promote, support, and oversee compliance with the anti-corruption policy and measures, including all applicable regulations, among all employees, staff, and related stakeholders, and to communicate related matters to all employees and all concerned parties.
- 4.3.2 To ensure that all systems and measures remain aligned with changes in business operations, regulatory requirements, and applicable laws.
- 4.3.3 To oversee the continued effectiveness and relevance of systems supporting anti-corruption practices within the organization.
- 4.3.4 To disclose any conflicts of interest and to ensure that the Chief Executive Officer and the Group Chief Executive Officer are not involved in procurement, recruitment, project monitoring, enforcement, or acceptance of work within their areas of responsibility, including any direct or indirect actions carried out through nominees.

4.4 Executives at the Vice President level and above

- 4.4.1 To oversee and ensure that the anti-corruption policy and measures are effectively implemented, and that related risks and issues can be identified, assessed, and managed in a timely and appropriate manner.

- 4.4.2 To support the development of processes and personnel to ensure the successful achievement of the objectives outlined in the anti-corruption policies and measures.
- 4.4.3 To strictly adhere to the anti-corruption policies and measures, and to refrain from soliciting, engaging in, or accepting any form of corrupt activity for personal gain or for the benefit of family, friends, or associates. All executives are required to disclose all conflicts of interest with the Company. They must also refrain from involvement in procurement, recruitment, project monitoring, enforcement, or acceptance of work within their areas of responsibility, including any direct or indirect actions carried out through nominees.

4.5 Employees

- 4.5.1 To understand and comply with the anti-corruption policies and measures and other applicable measures. To participate in training and annual assessments as specified by the Company.
- 4.5.2 To immediately report to the Company for any suspected corruption. To cooperate in the investigation pertaining to suspected corruption.
- 4.5.3 Employees are prohibited from being involved in corruption, whether directly or indirectly. Employees must strictly adhere to the Company's measures and procedures, especially those involved in the roles that carry corruption risks, such as procurement, credit, sales, human resources, support division, and investment.
- 4.5.4 To strictly adhere to the anti-corruption policies and measures, and to refrain from soliciting, engaging in, or accepting any form of corrupt activity for personal gain or for the benefit of, friends, or associates. All employees are required to disclose all conflicts of interest with the Company. They must also refrain from involvement in procurement, recruitment, project monitoring, enforcement, or acceptance of work within their areas of responsibility, including any direct or indirect actions carried out through nominees.

4.6 Internal Audit Division

- 4.6.1 To audit and review work performance and ensure accuracy and compliance with applicable policies, measures, regulations, and laws, and to confirm that appropriate and sufficient internal controls are in place. All related matters must be reported to the Audit Committee.

4.7 Corporate Governance Division

- 4.7.1 To provide consultation and guidance regarding anti-corruption matters.
- 4.7.2 To monitor the performance of the implementation of anti-corruption measures
- 4.7.3 To coordinate with relevant entities to promote and disseminate knowledge on anti-corruption.
- 4.7.4 The Corporate Governance Division is an independent entity that reports work performance and other performance in relation to anti-corruption to the Corporate Governance and Sustainable Development Committee.

4.8 Enterprise Risk Management and Sustainability Division

- 4.8.1 To develop tools for assessing corruption risk and assign relevant departments within the organization to conduct such assessments.
- 4.8.2 To report the results of the corruption risk assessments to the Risk Oversight Committee.
- 4.8.3 To compile risk control measures from each division and conduct an annual review of corruption-related risks.

4.9 Corporate Human Resource Division

- 4.9.1 To manage human resources in accordance with the Company's anti-corruption policies and measures.
- 4.9.2 To establish and implement processes for recruitment, orientation, training, and disciplinary action related to anti-corruption practices.
- 4.9.3 To promote a culture of integrity and anti-corruption and to refrain from any act that may be considered corruption.

4.10 Accounting and Taxes Division

- 4.10.1 To record and maintain information and documentation related to income, expenditures, and taxation.
- 4.10.2 To implement financial and accounting procedures in accordance with Generally Accepted Accounting Principles (GAAP).

- 4.10.3 To control and oversee expense disbursements in compliance with the established rules, procedures, and approval manuals.

4.11 Corporate Communication Division

- 4.11.1 To communicate and disseminate information regarding the Company's anti-corruption policy and measures, and other related activities to raise awareness on work ethics and integrity.
- 4.11.2 To communicate and report the Company's anti-corruption practices to the public.

5 Framework and Guideline on the Application of the Anti-Corruption Policy and Measures

5.1 Internal Control

The Company has established operational regulations, including the allocation of responsibilities based on the organizational reporting structure and defined approval authority levels. An internal control and audit system has been implemented to align with the Company's anti-corruption policy. These regulations are subject to review by the Internal Audit Division. In addition, all employees are required to perform their duties in strict compliance with the Company's regulations and operational standards.

5.2 Guidelines on the Application of the Anti-Corruption Policy and Measures

The Company has established clear steps and guidelines to mitigate the risks of corruption, as follows:

5.2.1 Giving and Receiving Bribery

- 5.2.1.1 All directors, executives, and employees at all levels are strictly prohibited from unlawfully soliciting or accepting any form of benefit or property that could influence their actions or omissions, or that may compromise the Company's legitimate interests.
- 5.2.1.2 All directors, executives, and employees at every level must refrain from offering or giving any interest or property to a third party in order to influence that individual to act or refrain from acting in ways that are illegal or improper in relation to their official duties.
- 5.2.1.3 The Company maintains a strict policy against facilitation payments, whether directly or indirectly. The Company does not

engage in or accept any actions in exchange for facilitating business operations.

The Company maintains a strict policy against bribery and the offering of gifts or gratuities to government agencies and other stakeholders.

5.2.2 Giving or Receiving Gift / Gratuity, Business Entertainment, or Other Benefits

When giving or receiving gifts, including souvenirs and business entertainment allowances, it is essential to adhere to the relevant rules and regulations. This includes following anti-corruption principles while ensuring that the gifts are reasonable and verifiable. Both the giver and the receiver must maintain transparency throughout the process.

5.2.2.1 All directors, executives, employees, and their family members are strictly prohibited from giving and receiving gifts or other benefits to and from business partners or entities associated with the Company's business, including their supervisors, subordinates, or colleagues.

5.2.2.2 All employees are prohibited from giving or receiving gifts or any benefits to or from business partners or entities associated with the Company's business. There are exceptions for gifts given in accordance with cultural traditions or festivals, provided that these gifts are of low value and do not involve any reciprocal benefits. Recipients of such gifts must consider their appropriateness and consult with their supervisors.

5.2.2.3 Gift giving is permitted in certain circumstances, such as: gifts bearing the Company's logo; gifts given in accordance with cultural traditions or festivals; gifts provided for sales promotion; or gifts intended to foster business relationships, offer congratulations, express gratitude, extend a welcome, convey condolences, or provide social assistance.

The Company regularly communicates its No Gift Policy to partners, contractors, business associates, and other relevant parties during festivals. If a gift poses a risk of damage or incurs excessively high delivery costs, the individual involved must

maintain a register to document the giving and receiving of gifts. Gifts received should be allocated fairly and transparently among employees. Additionally, the gift register, which also details how gifts are allocated, must be submitted to the Human Resources division.

5.2.2.4 All employees must refrain from giving or receiving entertainment that may be perceived as excessive or inappropriate in the context of standard business relationships. Engaging in entertainment or meals with the intention of influencing business decisions, supporting political activities, or violating regulations that could be construed as bribery is strictly prohibited. Exceptions may be made for entertainment or meals intended for business networking or knowledge sharing, provided that the associated costs are reasonable and not excessively extravagant.

5.2.2.5 Any acceptance of invitations to participate in meetings, conventions, or observations organized by customers, business agents, or partners must be approved by the highest executive of the respective division. The objectives and details of these activities should be clearly defined and planned in advance. Additionally, the results of the activities must be presented to the highest executive in that division. Employees should exercise discretion when accepting invitations to events with a hidden primary agenda on tourism/leisure, without any tangible business knowledge or benefits.

5.2.3 Political Contributions

The Company remains politically neutral in its business operations and does not provide any support or contributions to political parties, groups, or politicians, either directly or indirectly. Additionally, the Company does not allocate its financial resources, assets, or properties to these activities.

5.2.4 Revolving Door

The Company does not employ government officials or individuals from the public sector if such employment would result in any undue benefit to the Company. In cases where former public officials are appointed as advisors or executives, the Company discloses their information through official communication channels to ensure transparency. The employment and remuneration of any public official for an executive-level position or higher must be justified by necessity, exercised with the highest level of discretion, and carried out in full compliance with the Company's regulations.

5.2.5 Charitable Contributions, Donations for Public Benefit, and Grants

5.2.5.1 Donations of funds, properties, and grants intended for charitable or public benefit purposes must adhere to principles of transparency, legality, and ethical conduct, without any adverse impact on society.

5.2.5.2 The giving or receiving of charitable funds, property, or grants must not be used as a pretext for bribery.

5.2.5.3 Disbursements for charitable contributions and grants must comply with the Company's regulations on operational expense disbursement and delegation of authority. Relevant details must be submitted to the designated division for review and consolidation prior to providing recommendations to supervisors for approval. All disbursements must clearly state their objectives and be supported by verifiable documentation.

5.2.5.4 If there is any suspicion that an activity may violate the Company's anti-corruption policies or measures, written consultation must be sought from the Corporate Governance Division. Any other significant matter shall be subject to the discretion of the Management.

5.3 Employee Rotation

The Company encourages the rotation of employees assigned to positions with a high risk of corruption, such as those in procurement or land acquisition functions.

5.4 Guidelines on Monitoring/Assessing Compliance with the Anti-Corruption Policy and Conducting Employee Training

The Company reviews and updates its anti-corruption policy and measures annually, or whenever significant changes occur. It communicates with all personnel through various channels to ensure that the entire organization adheres to this policy. Training on anti-corruption practices is conducted for employees who oversee or are responsible for anti-corruption efforts. Additionally, the Company's personnel participate in third-party training sessions from both the public and private sectors. Anti-corruption topics are also included in the orientation training for new employees. Furthermore, regular anti-corruption training is provided to employees at all levels. Finally, the Company monitors compliance with the policy by requiring executives and employees to pass tests on the code of conduct, gift policy, whistleblowing procedures, and anti-corruption standards.

5.5 Guidelines for Governance and Control to Prevent and Monitor Corruption Risks

The Company has implemented a system to monitor and evaluate corruption risks by integrating it into the Company's standard operating procedures. Additionally, the Company has established whistleblowing channels to allow employees, partners, agents, the general public, and government officials to submit complaints.

6 Guideline on whistleblowing/complaint of Corruption

All employees must not ignore or overlook any action that is suspected or known to violate the Company's regulations, or any suspected actions related to corruption within the Company. Employees are required to report such actions to their supervisors or a designated responsible party, or through the Company's whistleblowing channels. Additionally, employees must cooperate with any investigations and strictly follow the Company's regulations regarding whistleblowing and corruption. If any employee has doubts or questions, they may seek advice from their supervisor or consult the Corporate Governance Department and the Internal Audit Department. If the issue involves an executive or a director, it must be reported directly to the Chairman of the Audit Committee.

The Company is committed to ensuring fairness and safeguarding all whistleblowers who report suspected corruption involving the Company, as well as employees who refuse to participate in unethical or unlawful conduct. Such protection is provided in accordance with the whistleblower protection measures outlined in the Company's Whistleblower Policy. The Company will not demote, penalize, or otherwise retaliate against any individual who declines to engage in corrupt practices, even if such refusal may result in a loss of business opportunity for the Group.

7 Recording of Business Information and Document Retention

All business, financial, and accounting records/documents must be accurately and completely prepared, reviewed, and maintained in accordance with the Company's procedures and accounting standards. Financial reports and related processes must also align with the Company's Anti-Corruption Policy. All relevant documents shall be securely stored in compliance with the Company's document retention policies.

8 Disciplinary Action

The Company is committed to fostering a culture of transparency, integrity, and zero tolerance for corruption among its directors, executives, and employees at all levels, whether directly or indirectly. This Anti-Corruption Policy is regularly communicated to all directors, executives, and employees, and is also made publicly available to promote awareness and ensure strict compliance.

Non-compliance with this policy constitutes a violation of the Company's rules and regulations. Individuals found to be in breach may be subject to disciplinary action. Claims of ignorance shall not be accepted as a defense. In cases where misconduct constitutes a legal offense, the Company reserves the right to pursue legal action against the offender.

Announced and Enforced on May 13, 2025

-Signed-

(Mr. Roongrote Rangsiyopash)

Chairman of the Board of Directors

Notice: This English translation of the Anti-Corruption Policy is provided for reference and ease of understanding. In the event of any discrepancies, the Thai version shall prevail and be deemed the legally binding document.