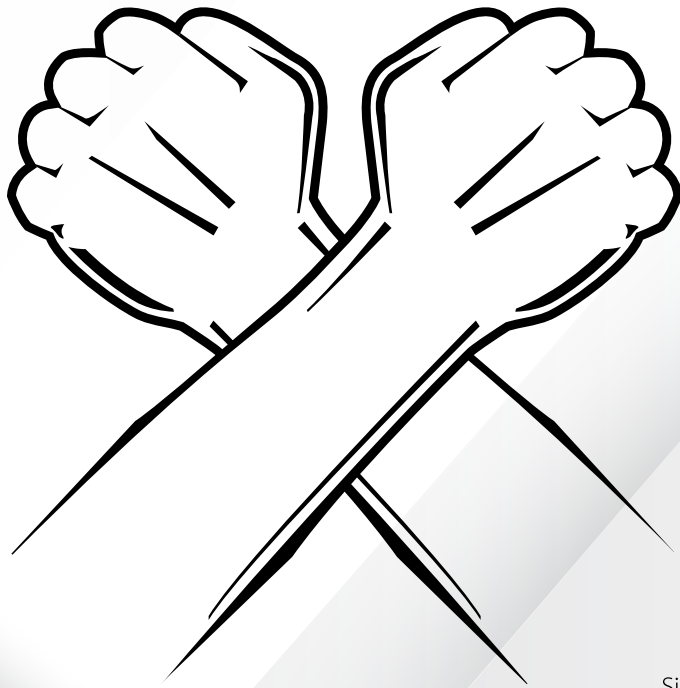




SIAM GLOBAL HOUSE PUBLIC COMPANY LIMITED
AND SUBSIDIARIES

Anti-corruption Policy



Siam Global House Public Company Limited

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Anti-Corruption Policy
Siam Global House Public Company Limited

1. Introduction

Siam Global House Public Company Limited (the “Company”) recognizes the importance of anti-corruption by conducting business with integrity, honesty, and transparency under good corporate governance principles, as well as demonstrating responsibility towards society, the environment, and all stakeholders.

To show its intention and commitment to combating all forms of corruption, the Company has established the Anti-Corruption Policy, written with a clear guideline for conducting business, particularly in areas prone to corruption risks, ensuring that all such matters are carefully and fairly considered and treated. The Company uses internal communication channels to enhance employees’ knowledge and understanding, fostering a corporate culture that actively opposes and rejects corruption. This commitment serves as a strong foundation for sustainable organizational development.

2. Definitions

Company	means	Siam Global House Public Company Limited, its subsidiaries, joint ventures, other companies over which it has control, and its business representatives
Personnel	means	the Company’s directors, executives, and employees
Executive	means	the Company’s executives at the level of Assistant Vice Chief Executive Officer or higher
Employee	means	permanent employees whose rank is below that of an executive
Corruption	means	the abuse of power in office, or the misuse of one’s position or authority for personal gain or for the benefit of others. This includes bribery: the giving or receiving of bribes in all forms, encompassing the offering, promising, giving, or soliciting of money, assets, or any other benefit. Such actions, whether direct or indirect, are directed towards government officials, state agencies, private organizations, or any person in a position of duty to induce such persons to act or refrain from acting in their duty, thereby obtaining or retaining business, specifically referring business to the Company, or securing any other undue business advantage, unless permitted by laws, regulations, announcements, rules, local customs, or commercial practices.
Money Laundering	means	transforming money or assets obtained from illegal acts or through unlawful means into seemingly legitimate money or assets
Giving or Receiving Gifts	means	giving or receiving assets, gifts, or any other benefits that can be monetized, from individuals or juristic persons. These are typically given during festivals, important dates, or as per customary traditions.

Entertainment / Hospitality Services	means	providing food, beverages, or any other form of hospitality, such as performances, sports viewing, or recreational/sports activities. These occur on special occasions as per customary tradition.
Charitable Contributions	means	donating money, things, or any other monetizable items to public organizations like schools, hospitals, temples, or foundations. These donations are made for public benefit and without expecting any returns or benefits from such activities.
Sponsorship	means	giving or receiving money, goods, or any other monetizable benefits with the objective of promoting the Company's business, brand, or reputation. It aims to build commercial credibility, foster business relationships, and is given on appropriate occasions.
Political Contribution	means	supporting political activities, both monetary and non-monetary, for politicians, party members, or political parties, whether directly or indirectly.
Conflict of Interest	means	engaging in any activity where personal interests or the interests of related individuals, whether direct or indirect, by blood relation or otherwise, influence decision-making. The influence may hinder or obstruct the Company's best interests.
Facilitation Payment	means	small, unofficial payments made to government officials to ensure that they perform routine processes or to expedite such processes
Bribery	means	offering, promising, or giving benefits in various forms that induce actions against law, ethics, or duty.
Revolving Door	means	an individual who is currently or was formerly a government official, politician, or consultant to a government agency, and has subsequently joined a private company. Such an individual may use their relationships or inside information to benefit the private company or create a conflict of interest with the performance of duties by a government agency or regulatory body overseeing the business, especially with the company under supervision. The outcome of such actions aims to gain an unfair business advantage or to influence policy-making to favor the private organizations that the former government official works for

3. Policy and Practices

- 1) Company personnel must comply with the anti-corruption policy and must not engage in or be involved in corruption, whether directly or indirectly. Compliance with this anti-corruption policy shall be regularly reviewed, and the operating guidelines and requirements shall be continuously revised to ensure alignment with business changes, regulations, and legal requirements.
- 2) Company personnel and business representatives of the Company are prohibited from demanding, engaging in, or accepting corruption in any form, whether directly or indirectly, for the benefit of the company, themselves, or others (e.g., family, friends, acquaintances). This prohibition covers all businesses in all countries and all relevant entities, both public and private sectors, and prohibits any actions that would cause damage to the Company's reputation.
- 3) Company personnel must not ignore or overlook any suspected acts of corruption related to the Company. They are required to report such incidents to their supervisor or responsible person through the Company's specified channels and are expected to provide full cooperation in fact-finding investigations.

- 4) The Company is committed to creating and maintaining a corporate culture rooted in that corruption is unacceptable, in any transactions with either public or private sectors.
- 5) The Company guarantees fair treatment and protection for any personnel who refuse to engage in corruption or report corruption related to the Company. The Company implement protection measures for whistleblowers or those cooperating in reporting corruption, as specified in the Corporate Governance Manual on the section of complaints and suggestions.
- 6) The Company recognizes the importance of providing information and knowledge, and ensuring understanding among all external parties whose duties relate to the Company or who might impact it. This ensures their adherence to this Anti-Corruption Policy.
- 7) The Company establish an assessment process for compliance with the Anti-Corruption Policy. The Internal Audit Office is tasked with monitoring and summarizing Anti-Corruption Policy compliance outcomes for presentation to the Audit and Risk Management Committee, thereby ensuring the policy's implementation receives proper response from all related persons.
- 8) The Company conducts corruption risk assessments and ensure the implementation of suitable and effective investigation process and internal control systems, encompassing processes, finance, accounting, and data recording, all subject to regular review.
- 9) The Company shall encourage its suppliers, contractors, other companies under the Company's controls, and business representatives, or any individuals acting on behalf of the Company in acknowledging the principles pursuant to this policy.

4. Responsibilities

Board of Directors

The Board of Directors is responsible for policy setting and oversees a system that supports Anti-corruption effectively to ensure that employees of the Company realize the importance of anti-corruption principles and cultivate such values as a part of the organizational culture.

Audit and Risk Management Committee

The Audit and Risk Management Committee is responsible for reviewing the financial reports and accounting system, internal control system, internal audit system, and risk management system in order to ensure their compliance with international standards as well as their prudence, suitability, and effectiveness. The Audit and Risk Management Committee is also in charge of handling submission of information, whistle blowing regarding corruption involving the company's personnel, conducting fact-finding investigations, and presenting the matter to the Board of Directors to consider a disciplinary action or resolve such problems, as well as giving consultation and ensuring compliance with this Anti-corruption Policy.

Sustainability and Corporate Governance Committee

The Sustainability and Corporate Governance Committee is responsible for considering, establishing, reviewing, and improving policies and practices related to Anti-corruption, as well as overseeing compliance with policies and practices related to anti-corruption.

Executive Committee

The Executive Committee is responsible for promoting and supporting anti-corruption policies, communicating to employees and all stakeholders, and reviewing the appropriateness of systems and measures to align with changes in business, regulations, and legal requirements.

Internal Audit Office

The Internal Audit Office has duties and responsibilities to audit and review the performance of work in accordance with the policy, guidelines, in order to ensure that the control system is appropriate and adequate for any potential corruption risk. And directly reporting to the Audit and Risk Management Committee and fulfilling the duties assigned by the Audit and Risk Management Committee regarding the examination of corruption-related matters concerning the company, beyond the scheduled audit plan.

Risk Management Working Group

The Risk Management Working Group is responsible for conducting risk assessments related to the corruptions and proposing measures and practices regarding Anti-corruption adequately to the Sustainability and Corporate Governance Committee, and the Audit and Risk Management Committee.

The Company's Employees at all levels

The Company's Employees at all levels have responsibilities to do understand and perform their duties in accordance with the anti-corruption policies and measures.

5. Related Measures and Practices

5.1 Giving or Receiving Gifts, Assets, Entertainment, and Hospitality related to Company Business

- 1) The Company's personnels must not request, accept to participate in social activities, sports events, hospitality, reception, gifts, or incentives for benefits of themselves or others from persons involved in the business.
- 2) If it is unavoidable, managers and employees may accept benefits or gifts for business advertising or customary practices in case the value of the benefits or gifts does not exceed 3,000 Baht. In cases where the value exceeds 3,000 Baht, managers and employees must notify supervisors in writing and submit the benefits or gifts to the Company.
- 3) In the event that managers and employees act as representatives of the Company and join entertainment events or social activities of business partners or travel for off-site training or work-related activities, and receive benefits or gifts exceeding 3,000 Baht, whether obtained through raffles, draws, or commemorative items, they are to adhere to the same guidelines as mentioned above.
- 4) Expenditures for entertainment and business hospitality, such as hosting meals and beverages, hosting sporting events, and other related business or trade customs, are permissible as long as they are reasonable and do not compromise decision-making in the performance of duties. Such expenses should not result in conflicts of interest and must comply with legal regulations, following the certification criteria specified by the Company.

5.2 Charitable Contributions and Sponsorship

The giving or receiving of donations or sponsorships to any organization with objectives for the benefit of society, carried out on behalf of the company, must be transparent, following the company's procedures and complying with the law. Additionally, it must be ensured that the donated funds or sponsorships are not misused for corrupt purposes, adhering to the code of conduct and business ethics of the Company.

5.3 Political Contributions

- 1) Company shall maintain political neutrality and shall not act in the interest of or provide financial or other support to political parties, political coalitions, political figures, or political candidates, either directly or indirectly, either at the local, regional, or national level.
- 2) The Company's personnel shall strictly comply with Code of Conduct of the Company.

5.4 Conflict of Interests

- 1) The Company's personnel must perform their duties with honesty, avoiding any actions that could create conflicts of interest with the company. And refrain from conducting any action that may compromise the company's interests or seek personal and/or related-party benefits, adhering to the business ethics and code of conduct of the company.
- 2) The Company has policies for the recruitment or selection of personnel, promotions, training, performance evaluations, and compensation that are fair and sufficient to prevent conflicts of interest that may lead to internal corporate corruption.
- 3) The Company's personnel are prohibited from engaging in making decisions involving transactions in which they or related parties have a personal interest or stand to gain or lose in the matter.

5.5 Facilitation Payment

The Company does not have a policy of providing any form of facilitation payment, either directly or indirectly. By not engaging in any action and will not accept any conduct in exchange for business facilitation.

5.6 Giving or Receiving Bribes (Bribery)

Company personnel and business representatives are prohibited from:

- 1) Offering, promising, or giving bribes to government officials, state agencies, private organizations, or other private sector officials, whether directly or indirectly, on behalf of or for the business benefit of the Company.
- 2) Requesting, soliciting, or accepting bribes for personal gain or for the benefit of related parties, including family members, friends, or any other associated individuals.

5.7 Anti-Money Laundering (AML)

The Company adheres to all applicable anti-money laundering laws and regulations, committed to preventing anyone from using the Company as a channel or tool to transfer, conceal, or disguise the illicit origins of assets.

- 1) The Company only conducts business with suppliers operating legally, who do not engage in practices that could be money laundering. Company personnel must exercise due diligence in selecting suppliers and thoroughly review their backgrounds.
- 2) Company personnel are expected to actively prevent and monitor for transfers to unknown accounts or the receipt of unusually structured payments. If any unusual transactions are observed, they must be immediately reported to their supervisor.
- 3) The Company encourages understanding and knowledge of anti-money laundering practices among all employees.

5.8 Employment of Government Officials (Revolving Door)

The Company maintains a policy of not hiring government officials, unless it is absolutely necessary given specific circumstances. The Board shall consider the selection criteria based on appropriateness to ensure that there is no conflict of interest prior to the appointment. Additionally, the Company will disclose the background information of such individuals in its published documents, following the guidelines of the relevant regulatory authorities.

5.9 Procurement

The Company is committed to transparent and auditable procurement practices, strictly adhering to its procurement policies and regulations. The Company sets clear budget limits and approval authorities for purchases, along with a distinct division of responsibilities to ensure appropriate checks and balances. Furthermore, all transactions must be supported by complete and clear documentation, which will be regularly audited to verify accuracy.

5.10 Risk Assessment

Bribery risk assessment involving government officials is a crucial step for the Company to establish appropriate internal control measures. The Company designates the risk management working group to assess the risks associated with various transactions between the Company and government agencies, which may involve procedures or processes for providing benefits and corruption. The risk assessment is conducted at least annually, along with a review of the existing risk management measures to ensure that the risks are maintained at an acceptable level.

5.11 Internal Control and Audit

The Company has established an internal audit and control system to ensure that the specified processes or operational procedures will help prevent corruption in the business operations. This includes efficient storage and maintenance of data, supporting documents, financial reports, and financial data backups in a computer system, ready for auditing and verification to comply with anti-corruption measures.

5.12 Human Resources Management

- 1) The anti-corruption policy applies to all human resources management processes: recruitment, selection, promotions, training, performance evaluations, and compensation, to ensure transparent and fair operations of Human Resources that align with the anti-corruption measures.
- 2) New employees will receive an orientation on the 1st and 16th of each month to acknowledge business ethics and code of conduct, including Anti-Corruption Policy. This ensures all employees of all levels understand and recognize the importance of adhering to the policy.
- 3) All employees will receive regular training on anti-corruption and anti-bribery practices to enhance knowledge, understanding, and apply correctly. The training also emphasizes the reporting channels for raising concerns, reporting cases, or suspicions of giving or receiving benefits or engaging in corruption.

5.13 Communication

- 1) All employees can access the anti-corruption policy through the Company's internal communication channel (SharePoint) and the website www.globalhouse.co.th. The Company will notify employees of any significant changes to the information.
- 2) The Company will communicate this policy to suppliers, business representatives, service providers, contractors, and other stakeholders through the Company's website and the annual report (56-1 One Report).

6. Whistleblowing and Whistleblower Protection Measures

Channels for Whistleblowing and Reporting Complaints

Channels	Details	Person in charge
E-mail	secretary@globalhouse.co.th	Company Secretary
Company's website	https://globalhousenews.com/whistleblower-with-complaints/	Company Secretary
Complaint submission box	Complaint, suggestions submission box in store	Company Secretary
Post Mail	Audit Office Siam Global House Public Company Limited 232 Moo 19, Rob Mueang, Mueang, Roi Et, Thailand 45000	Audit Office

Whistleblower Protection Measures

- Whistleblowers or complainants can choose not to disclose their identity if they believe it may impact their job responsibilities or if they feel that disclosure may not be safe. In cases where the name is disclosed to the company, the company will report progress and provide the facts to the complainants.
- The Company will keep related information confidential, considering the safety and well-being of the complainant. Protection measures have been established for the whistleblower or complainant and/or the information provider and/or the cooperating party in verifying the facts. They will be protected against unfair practices, such as changes in job position, job nature, workplace, be suspended from job, harassment, interference with work, termination, resulting from the reporting of complaints.

Process for Handling Whistleblowing Reports

1) Receiving Reports and Fact-Gathering

When receiving a report of misconduct or a complaint, the recipient in various channels should notify the whistleblower or complainants, in case the whistleblower reveals their identity. Additionally, the recipient should gather relevant facts and forward the matter to the investigation committee for further inquiry. The investigation process should be completed within 45 days from the date of receiving the report or complaint.

2) Investigation and Action Against the Alleged Person

The investigation committee is responsible for conducting a factual examination, processing, and screening all information received to assess the impact of each case and determine the appropriate processes and management methods. The committee must then report the results of their investigation into reported misconduct or complaints to the Audit and Risk Management Committee and/or the Executive Committee for their consideration. All investigations and factual conclusions must be completed within 45 days from the date the complaint or report of misconduct is received. The Audit and Risk Management Committee reviews the summary of the investigation results regarding complaints or tips on misconduct, submitting it to the Board of Directors for consideration of disciplinary action.

The factual investigation process outlines measures to suspend or address breaches and non-compliance with the Business Code of Conduct and to mitigate harm to affected individuals, considering the overall impact and distress caused. Additionally, necessary measures are in place to protect complainants, whistleblowers, and individuals cooperating in factual investigations who may face repercussions.

3) Summary and Reporting

The investigation committee reports findings to the complainant or whistleblower (if they identified themselves) within 7 business days from the date the findings are finalized.

7. Disciplinary Action

Company personnel who engage in corruption are in violation of the Business Ethics and the Code of Conduct. Such actions will result in disciplinary action in accordance with the Company's regulations. Furthermore, they may face legal penalties if their actions are found to be unlawful.

Nevertheless, the Company will not demote, penalize, or yield negative consequences to directors, executives, and employees who refuse to engage in corruption, even if such actions result in the company losing business opportunities. Disciplinary measures imposed by the Company's regulations will be considered final decisions by the Board of Directors.

8. Policy Review

The Company reviews and updates its Anti-Corruption Policy at least once a year to ensure that the anti-corruption measures and guidelines remain appropriate and aligned with any evolving corruption risks.

This Anti-Corruption Policy was reviewed and approved by the Sustainability and Corporate Governance Committee, and subsequently approved by the Board of Directors at Meeting No. 3/2025 on July 25, 2025.

The policy is effective from July 25, 2025, onwards.



(Mr. Apisit Rujikeatkamjorn)

Chairman of the Board of Director
Siam Global House Public Company Limited



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