

Anti-Corruption Policy

Moshi Moshi Retail Corporation Public Company Limited

Anti-Corruption Policy

Moshi Moshi Retail Corporation Public Company Limited (“the Company”) recognizes the importance of anti-corruption and is committed to conducting business with integrity under the framework of good corporate governance based on good corporate governance principles. The Company aims to conduct business ethically, transparently, fairly, and verifiable, including strictly complying with regulations, rules, and laws to ensure that the Company and its personnel, subsidiaries and their personnel do not tolerate corruption. Therefore, the Company has established a written anti-corruption policy to prevent corruption in all business activities both domestically and internationally, and to ensure that any business decisions and actions that may be at risk of corruption are reviewed and carefully considered and followed in accordance with this policy in order to provide clear practical guidelines for doing business and developing into a sustainable organization.

1. Definitions

“**Corruption**” means to the abuse of authority to obtain undue benefits, giving or accepting bribes in any form by offering, promising, pledging, demanding, giving, or receiving money, property, or other benefits that are not valid to government officials, government agencies, private entities, or persons who have a duty, whether directly or indirectly, to enable such persons to act or refrain from performing their duties or to obtain or maintain illegitimate business interests.

“**Charity**” means an activity that involves spending money without tangible returns.

“**Donations for the public interest**” means spending money on projects and activities for the benefit of the community, society, and the public that the Company may not receive tangible returns.

“**Political Contributions**” means the provision of assistance on behalf of the Company, regardless of finance or in any other form, to support political activities. Financial assistance includes lending money and other forms of assistance (in-kind), such as providing objects or services, advertising to promote or support political parties, purchasing tickets to events organized to raise funds or donating money to organizations with close ties to political parties, unless it supports a democratic process that can be done by law.

“**Sponsorships**” means money paid for services or benefits that are difficult to measure and monitor, which may be linked to bribery. For example, financial support may have a hidden purpose by using charitable sports or charitable organizations as a disguise to gain an advantage in the consideration of government officers or those involved (examples of advantageous considerations include contracting, business opportunities, or auction, reduction or cancellation of fees; giving, assistance, or cancellation of requirements needing licenses, which is incorrect according to the normal government decision-making

process, cancellation or reduction of legal requirements, or giving or assisting in accessing government officials).

“Public officer” means a “public officer” according to the meaning set forth in the Law on the Prevention and Suppression of Corruption and includes civil service officer, state enterprise official, employee, agent, or other persons representing the following agencies:

- Ministries, bureaus, departments, or government agencies (Customs Department, Immigration Bureau, etc.)
- International organizations (for instance, the World Bank; International Monetary Fund)
- Political parties, political office holders, or candidates (both government and opposition parties), local executives
- Regulatory authorities (Securities and Exchange commissions, Bank of Thailand, Stock Exchange of Thailand, etc.)
- State enterprises or other companies or organizations owned or controlled by the government agencies.

2. **Anti-Corruption Policy**

2.1 Directors, executives, and employees at all levels of the Company shall not demand or take any action that directly or indirectly grants or receives or accepts any form of corruption, whether it is for the benefit of the organization, family, friends, and acquaintances or for business benefits. It covers both domestic and foreign businesses, as well as all related departments of the Company and its subsidiaries.

2.2 Business operations and procurement must be transparent, honest, and in accordance with relevant laws.

2.3 The Company shall require a regular review of compliance with this anti-corruption policy, as well as reviewing practical guidelines and operational requirements in accordance with business changes, regulations, and legal provisions. If there is any act of corruption, supporting, assisting, or cooperating with corruption, it will be punishable in accordance with the Company's regulations.

3. **Duties and Responsibilities**

3.1 The Board of Directors has duties and responsibilities to formulate an anti-corruption policy by providing effective anti-corruption support systems to ensure that the Company's personnel at all

levels are aware of the importance of anti-corruption and have implemented it into the corporate culture, including advising and monitoring compliance with the anti-corruption policy.

- 3.2 The Audit Committee has duties and responsibilities for adequately reviewing the accounting system and financial reports, internal control system and review of operations in accordance with the announcements, regulations, and related laws.
- 3.3 The management has the duties and responsibilities to implement the anti-corruption policy by establishing a system to promote, support, supervise, and communicate to employees to ensure that employees and all related parties comply with the anti-corruption policy, including reviewing the appropriateness of systems and measures to be consistent with business changes, regulations, and legal requirements.
- 3.4 The Internal Audit Department has the duty and responsibility to examine and monitor the performance to ensure that it is correct, consistent with the policy, practices, and relevant laws to ensure that there is an appropriate and adequate internal control system to prevent potential corruption risks, including preparing an assessment of risks related to corruption and reporting to the Risk Management Committee.
- 3.5 Directors, executives, and employees at all levels of the Company shall comply with the anti-corruption policy without being involved in corruption, whether directly or indirectly.

4. Scope and Practical Guidelines

- 4.1 The Company assigns directors, executives, and employees at all levels shall work with caution to prevent corruption in all forms as follows:
 - **Giving and receiving bribes**

No bribery shall be given or accepted in any form in return for the granting of business interests, and no person shall be assigned to or receive bribes on their own behalf.
 - **Gifts, receptions, and other benefits**

Giving or receiving any gifts, receptions, or benefits to or from customers, partners, government officers or persons affiliated with the Company must comply with the Company's regulations and act with transparency and verifiability and in accordance with the custom.
 - **Political assistance**

The Company, including the directors, executives, and employees, shall conduct business activities neutrally without supporting politicians and financial or material support to political parties, political coalition, political authorities, or political candidates at local, regional, and national levels. If the directors, executives, and employees wish to participate in activities

according to their individual rights, they shall not impersonate the personnel or representatives of the Company or its subsidiaries or use any property, equipment, and instruments of the Company or any of its subsidiaries for the benefit of any political action.

- **Receiving donations, charitable donations, donations for the public interest, and giving or receiving subsidies**

The Company requires that donations, charitable donations, donations for the public interest, and giving or receiving subsidies must meet the following requirements:

- (1) It must be transparent, lawful and not contrary to morals, including not taking any action that will have a detrimental effect on society as a whole.
- (2) It must not be relevant or not used for bribery.
- (3) It must comply with the procedures for reviewing and approving charitable donations, public interest donations, or subsidies according to the Company's regulations.
- (4) In the case of suspicion of acting in a manner contrary to this practice, written advice from the legal department shall be sought, or if it is an important matter, the management shall consider it.

4.2 The directors, executives, and employees at all levels of the Company should not neglect or ignore when witnessing acts of corruption involving the Company and its personnel, they shall inform the responsible person and cooperate in various fact-checking.

4.3 The Company shall provide channels for whistleblowing or receiving complaints from persons within the organization and third parties and shall provide fairness and protection to employees denying or reporting corruption related to the Company and its personnel without reducing positions, punishing, or giving negative consequences to such employees even if such actions cause the Company to lose business opportunities.

4.4 The Company will provide training and orientation to new executives or employees on the anti-corruption policy to be acknowledged and implemented.

4.5 The directors and executives at all levels of the Company and its subsidiaries shall demonstrate integrity and be a good role model in compliance with the anti-corruption policy by requiring the Company Secretary to be responsible for disseminating knowledge, creating understanding, and encouraging employees at all levels to take the anti-corruption policy seriously until it becomes the corporate culture.

- 4.6 This anti-corruption policy covers the personnel management process, from recruitment or selection, promotion, training, and performance appraisal of employees. The supervisors at all levels are required to communicate and understand with the employees under their responsibilities acknowledge and supervise compliance with the policy effectively.
- 4.7 The Company will implement the anti-corruption policy, applicable laws, including the Company's operating procedures and manuals and any other guidelines that the Company will establish later.
- 4.8 The Company will regularly review the anti-corruption policy at least once a year.

In this regard, witnesses of corruption related to the organization can report corruption whistleblowers through the channels specified by the Company under the whistleblowing policy regarding wrongdoing. The Company will provide measures to protect against corruption whistleblowers.

5. Dissemination of the Anti-corruption Policy

In order for everyone in the organization, including business partners and persons with business contacts, to be informed of the anti-corruption policy, the Company will take the following actions:

- 5.1 The Company will post its anti-corruption policy in a prominent place so that it can be read by everyone in the organization.
- 5.2 The Company will publish the anti-corruption policy through the Company's communication channels, such as the Company's website, annual report, and 56-1 One Form.

The subsidiaries shall adopt this anti-corruption policy mutatis mutandis.

This Anti-corruption Policy shall come into force from July 6, 2022, onwards.

(Dr. Woraphatr Todhanakasem)

Chairman of the Board of Directors

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