Anti-Corruption Policy

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JAS Asset Public Company Limited is committed to conducting its business with integrity, in accordance with good governance and corporate governance principles, and with responsibility to society and all stakeholder groups. The Company formally declared its intention to join the Thai Private Sector Collective Action Against Corruption (CAC) in 2022 to demonstrate that it neither accepts nor supports corruption in any form and is committed to conducting business transparently.

The Company has established this Anti-Corruption Policy to cover activities that may create opportunities for individuals or groups to improperly obtain benefits from the Company through embezzlement, concealment or distortion of information, or bribery involving money or valuable assets. This Policy provides employees at all levels with criteria for performing their duties and considering the approval of transactions with integrity, transparency and fairness throughout each process. It also aims to prevent adverse effects on the Company's reputation and stakeholders and sets out procedures for reporting and systematically handling complaints.

Accordingly, the Company announces that this Anti-Corruption Policy applies to the Board of Directors, executives and employees at all levels, as well as subsidiaries, associated companies, business representatives and business partners, all of whom shall acknowledge and comply with it.

Scope of Application of the Anti-Corruption Policy

This Anti-Corruption Policy applies to all units working directly or indirectly with JAS Asset Public Company Limited, including its subsidiaries and associated companies, business representatives and business partners, and to directors, executives and employees at all levels. It serves as criteria for their work together in strict adherence to integrity, good governance and ethical conduct.

Definitions

Corruption

Means any act contrary to law or regulations to obtain an improper benefit for oneself or another person, directly or indirectly. This includes giving, offering, demanding, receiving or accepting assets, money or any other benefit to induce a person to act or refrain from acting improperly in relation to their duties. Corruption may take the form of bribery, kickbacks, preferential treatment or abuse of position.

Fraud

Means conduct in breach of the Company's procedures or the law to obtain personal benefits or benefits for a particular group, where records or the course of conduct cannot be reconciled with applicable procedures and actual operations. It includes bribery in exchange for assets, money or non-transparent promises; unauthorized actions without approval; giving anything to induce an employee to neglect a duty; abuse of authority to threaten or demand something contrary to Company rules; and unauthorized transfer of money or assets into personal ownership or the ownership of a particular group.

Gift

Means money or valuable assets given to the Company's stakeholders to offer congratulations or good wishes on traditional holidays or customary occasions. A gift must not be given or received in exchange for a non-transparent business benefit, constitute bribery, or be given at an individual's discretion without authorization.

Customary Occasion

Means a social occasion not listed as a Thai or international calendar holiday but customarily recognized in business to convey congratulations or thanks. Participation is optional.

Hospitality

Means providing hospitality to third parties, excluding hospitality between Company supervisors and employees, through food and beverages, accommodation or lawful entertainment for business dealings or other business-related occasions only.

Sponsorship

Means business-related support for activities and mutual product promotion among the Company's stakeholders, or support for educational institutions' activities upon written request in return for promoting the Company at educational events. Sponsorship may be given or received in the form of funding, consumer goods or technology products. Its principal purpose is business-related rather than charitable; therefore, no charitable donation receipt may be requested in any case.

Charitable Donations

Means giving valuable goods or funds to foundations, charitable organizations, educational institutions or public-benefit projects without expecting money or assets in return for the business. Such donations genuinely support social activities and are unrelated to business dealings. The Company may request a charitable donation receipt, if available.

Political Contributions

Means providing assistance to political parties, the government, political groups or politically connected persons through assets, funding or political publicity. Company involvement in such assistance may harm public confidence in the Company. Political contributions do not include employees' exercise of their lawful democratic voting rights.

Conflict of Interest

Means giving priority to personal interests in the performance of duties; allowing personal feelings to influence work or decisions contrary to Company rules; seeking a benefit from an activity to which one is not entitled; or interfering in work outside one's responsibility. To avoid a conflict of interest, employees at all levels shall follow Company rules and designated approval authorities and place the Company's overall interests above personal interests or the interests of a particular group.

Facilitation Payment

Means a corrupt payment constituting bribery by giving money or valuable assets to any person or legal entity in the public or private sector to shorten or bypass prescribed procedures.

Employment of Former Government Officials (Revolving Door)

Means employing a former government official who has left public office for at least two years as a consultant, senior executive or employee at any level through ordinary selection procedures. Such persons receive the same benefits as other employees and no special privileges. The Company must not use their former government connections to coordinate with public agencies or bypass government procedures.

Bribery

Means giving, offering or receiving assets, benefits or anything of value to induce an improper act or omission, causing harm to the Company or its stakeholders.

Kickback

Means returning part of a benefit to a decision-maker or person involved in a contract in exchange for rights or benefits from a transaction with the Company. It is a form of bribery.

Foreign Public Official

Means a person holding a position in a foreign government agency or its state enterprise, including an organization or entity entrusted to perform government functions.

Official of an International Organization

Means a person appointed or assigned to perform duties for an international organization, such as the United Nations, World Bank or World Health Organization.

Business Partner

Means an individual or legal entity with a business relationship with the Company, such as a supplier, contractor, consultant or agent.

Employee

Means a person working for the Company, whether a permanent, temporary or contract employee.

External Stakeholder

Means an external person or group affected by or able to affect the Company's business, such as shareholders, investors, customers, communities, government agencies and business partners.

Agent or Distributor

Means a person or legal entity appointed to conduct business activities on the Company's behalf, such as selling products, negotiating business or procuring materials and equipment.

Anti-Corruption Guidelines

1) Giving or Receiving Gifts and Hospitality

The Company does not encourage giving or receiving gifts of any kind, including cash, goods, gift baskets, technology products, preferential access to food and beverage services, or entertainment. Executives and employees at all levels shall act with integrity, transparency and openness, without seeking improper personal gain that may lead to corruption or bribery, directly or indirectly, and adversely affect the Company's credibility or its stakeholders.

Guidelines for Receiving Gifts

1. Employees and departments shall not solicit gifts or use the Company's name to obtain improper or unfair benefits.
2. Where a gift cannot be declined, the Company or its representative should first communicate with the giver to ascertain whether the gift carries any expectation of an exchange, a non-transparent promise or a business obligation amounting to corruption, whether immediately or in the future.
3. The Company or its representative shall assess whether the estimated value of the gift is appropriate for the occasion. A gift must not be unlawful or contrary to accepted social ethics. If its value is excessive for the occasion, it may be declined without breaching Company policy.
4. If the Company or its representative determines that receiving a gift would cause more harm than benefit, it may be declined without breaching Company policy.
5. After receiving any gift, whether an asset or cash, the Company's representative shall immediately, or within one to three working days, enter it into the Company asset registration process. The gift shall not be transferred before approval by an authorized approver or retained as personal property without authorization.
6. Once recorded, the Asset Registration Department shall consider whether the gift can be used within the Company. If not, it shall consider either donating or selling it.
   - 6.1. For donation: the Asset Registration Department shall record the following in the “Request to Give or Receive Donations” form:
     - 6.1.1. Name of the event, project, foundation or charitable organization.
     - 6.1.2. Date and time of donation.
     - 6.1.3. Place of donation.
     - 6.1.4. Name and telephone number of the contact person or receiving organization.

6.1.5. Purpose of donation.

6.1.6. Quantity of goods or monetary value donated.

6.1.7. Signatures of the requester, reviewer and approver, in that order.

6.2. For sale: the Asset Registration Department shall record the following in the "Assets for Sale" form:

6.2.1. Name of asset.

6.2.2. Brand, model and identifying characteristics.

6.2.3. Type of asset.

6.2.4. Quantity.

6.2.5. Estimated value before sale.

6.2.6. Signatures of the requester, reviewer and approver, in that order.

6.2.7. Signature of the purchasing individual or legal entity.

6.2.8. Following a partial or full sale, the responsible officer shall submit all payment records to the Accounting/Finance Department on the same day or no later than the following day, for issuance of a receipt and accounting entry.

6.2.9. The Accounting/Finance Department shall retain the Assets for Sale form, payment receipts and receipt documents in the accounting records for subsequent review.

Guidelines for Giving Gifts

1. Before giving a gift to a business ally or any Company stakeholder, the Company or its representative shall check whether the recipient has expressly adopted a No Gift Policy. If so, that policy should be respected and followed strictly.
2. The Company may consider giving gifts on the following occasions:
   2.1. Traditional holidays: International New Year, Thai New Year and Christmas.
   2.2. Customary congratulations: the opening of a new business, branch or project, or a business achievement.
3. The Company or its representative may give gifts to business allies or stakeholders up to a limit of 30 occasions per year.
4. Each gift must have a clear purpose and relate to an occasion specified above. Before proceeding, the Company's representative shall obtain approval from an authorized approver, who shall consider the following four factors:
   4.1. Whether the annual gift quota has been observed.

4.2. Whether the recipient belongs to a Company stakeholder group.

4.3. Whether the gift's value falls within the authorized gift expenditure limit.

4.4. Whether the gift's value is appropriate for the occasion.

Guidelines for Hospitality

1. Hospitality for Company stakeholders, excluding employees, may be provided for the following purposes:
   1.1. Hospitality in connection with business dealings.
   1.2. Hospitality for AGM or EGM meetings, meetings on proposed agenda items, and press conferences.
2. The Company or its representative may provide food and beverages, accommodation and lawful entertainment within the approved annual budget. Particular care should be taken with entertainment: expenditure on any one occasion should not be excessive, even within budget, and the need for the activity should be considered.
3. For hospitality involving accommodation or entertainment, the requesting department shall submit an internal memorandum to an authorized approver in advance for consideration of the following three factors:
   3.1. Whether the request is consistent with the purpose of the type of hospitality.
   3.2. Whether the accommodation arrangements and/or overall activity details are appropriate.
   3.3. Whether the requested amount is within the budget for hospitality.
4. Once the activity is complete, the requesting department shall submit all supporting documents, whether originals and/or copies, to the relevant department within three to five working days.

2) Giving and Receiving Sponsorship

The Company may give or receive sponsorship from its stakeholders in the form of funds, consumer goods or technology products, provided that it benefits the wider group, has a transparent purpose consistent with Company objectives, and does not seek improper personal or group benefits, induce corruption or bribery, or encourage anyone to neglect a duty.

Guidelines for Receiving Sponsorship

1. The Company may receive stakeholder sponsorship for the following purposes:
   1.1. Supporting activities organized by the Company for employees.
   1.2. Product advertising and promotion or product testing by Company stakeholders.

2. Employees shall not independently solicit sponsorship without a clear purpose or verifiable basis.
3. The Company or its representative may decline sponsorship if it is inappropriate because it is intended as a bribe or an exchange for a non-transparent benefit, or falls outside Company objectives.
4. Before accepting sponsorship, the Company or its representative shall carefully review the sponsoring person or entity for any history of corruption, unlawful conduct or fines imposed by authorities, whether a matter is pending or concluded, to avoid adverse public effects on the Company and its stakeholders.
5. Upon receiving sponsorship in the form of valuable assets or funds, the Company's representative shall record the assets or funds through the asset registration process within one to three working days.
6. The Company cannot issue a charitable donation receipt to a sponsor because sponsorship is not a donation to a charitable organization, fund or foundation.

Guidelines for Giving Sponsorship

1. The Company or its representative may sponsor Company stakeholders for the following purposes:
   1.1. Supporting activities organized by stakeholder groups, including activities for pupils and students, with funds or assets of value upon receipt of a written request.
2. Monetary sponsorship shall fall within the Company's approval authority limits. Assets provided as sponsorship shall not be unlawful or contrary to accepted standards of morality.
3. Before giving sponsorship, the Company's representative shall prepare an internal memorandum with publicity materials or other verifiable information establishing that the project exists, and seek approval from an authorized approver, whether the Company proposes the sponsorship or receives a request for it.
4. After completion, the requesting department shall collect and submit all supporting documents to the relevant department for the annual sponsorship records.

3) Receiving and Making Charitable Donations

Donations may be made to support activities for public benefit without expecting a monetary business return and to gain acceptance among business stakeholders, society and communities near the Company. They may consist of money or assets of value and shall be made only in the Company's name.

The Company may give or receive charitable donations in the following categories:

- Education, such as funds to build a library, scholarships or educational equipment.

- Sports, such as funds to repair a sports field, sportswear or sporting equipment.
- Public health, such as funds toward the purchase of medical equipment.
- Social welfare, such as repairing a bus-stop sign near the Company, funding improvements to a public restroom or donating consumer goods to disaster victims.

Guidelines for Receiving Donations

1. The Company may receive charitable donations for the following purposes:
   1.1. Acting as an intermediary or host in collecting donations of money or assets for donation only within the categories specified by the Company.
2. The Company shall not solicit donated money or assets obtained through fraud or corruption, or donations from persons or entities involved in corruption or any unlawful activity.
3. After receiving a donation, the responsible Company representative shall complete the "Record of Charitable Donations Received and Made" form and transfer all donated money and assets to the project. No portion may be transferred into personal ownership.

Guidelines for Making Donations

1. A donation may be made only after approval by an authorized approver and within the Company's donation approval limits.
2. Before making a donation, the Company's representative shall seek prior approval and clearly record the following details in the "Record of Charitable Donations Received and Made" form:
   2.1. Name of the event, project, foundation or charitable organization.
   2.2. Place of donation.
   2.3. Name and telephone number of the contact person or receiving organization.
   2.4. Start and end dates of the donation.
   2.5. Purpose of the donation.
   2.6. Quantity of goods or monetary value donated.
   2.7. Signatures of the requester, reviewer and approver, in that order.
3. If goods must be purchased or manufactured for donation, the requester shall follow the Company's procurement procedures after approval of the donation form.

4. After completion, the requesting Company representative shall collect supporting documents, including tax invoices and charitable donation receipts, if any, and submit them to the relevant department within three to five working days.

4) Political Contributions

The Company does not support political activities in any form, including publicity for a political party or the provision of funds or assets. It values democratic principles and political neutrality in its work, and supports every employee's equal exercise of lawful democratic rights as a responsible citizen.

Guidelines for Political Contributions

1. The Company prohibits political campaigning and the display of political notices or advertising, online or offline, on any Company premises.
2. Employees shall not use their status as Company employees to provide political assistance or support in any form, to avoid reputational harm, differences of opinion or public misunderstanding concerning the Company and its stakeholders.
3. Employees at all levels may freely exercise their lawful democratic rights. They should avoid strongly worded political views in the workplace or during working hours, overt political affiliation, and attempts to persuade colleagues to join political activities, to avoid differences of opinion and protect colleagues' freedom of choice.
4. Department heads shall not use their authority to induce or compel employees to participate in political activities.

5) Conflict of Interest

The Company is committed to conducting business honestly, transparently, equally and fairly toward all stakeholders, with the Company's interests as a priority, while avoiding unfair conflicts of interest. Directors, executives and employees shall carefully review processes and transactions that may involve related parties or give rise to conflicts of interest, in accordance with good corporate governance principles.

Guidelines for Conflicts of Interest

1. The Company shall accurately and fully disclose matters required under the rules of the Securities and Exchange Commission and the Stock Exchange of Thailand, without distorting information.

2. Employees at all levels shall perform their duties to the best of their ability within their respective responsibilities and shall not interfere with work outside those responsibilities.
3. Authorized approvers shall strictly follow Company rules and requirements when approving any action and shall not abuse their position for improper personal gain that creates overlapping interests or a conflict of interest affecting the Company or any stakeholder group.
4. Employees at all levels shall not use Company information to pursue activities that compete directly or indirectly with the Company. Confidential operational information of one department shall not be disclosed to unrelated departments where this may adversely affect work processes.

6) Facilitation Payments

The Company does not make facilitation payments to public or private sector entities to expedite or bypass procedures relating to its business, projects or other processes, to treat wrongful conduct as permissible, or to obtain an unfair business advantage.

Guidelines for Facilitation Payments

1. The Company does not give or accept facilitation payments under any circumstances, regardless of any proposed benefit or convenience to the Company. Payments through a third party are likewise prohibited.
2. Directors, executives and employees shall not create opportunities for anyone to demand facilitation payments in any form or disregard circumstances that may lead to such conduct.
3. The Company shall deal and transact with public and private sector entities in accordance with applicable rules, without giving or accepting facilitation payments.

7) Employment of Former Government Officials (Revolving Door)

The Company does not employ persons who still hold public office. Persons who have left public office for at least two years may be appointed as directors, executives, employees or consultants, provided that they undergo the same recruitment and selection procedures as applicants who have not worked in government.

Guidelines for Employment of Former Government Officials

1. Only persons who have left public office for at least two years may apply for any position with the Company.

2. When recruiting a former government official, the Recruitment Department shall carefully check the applicant's background to avoid adverse effects on the Company.
3. The Company shall not exploit an employee's former government position for Company benefit. Former officials employed by the Company shall not disclose Company information to government agencies or use previous connections to facilitate Company transactions with those agencies.

Oversight and Monitoring of Policy Compliance

The Board of Directors oversees effective implementation of the Anti-Corruption Policy and assigns the Audit Committee to monitor compliance, assess risks, recommend improvements to anti-corruption internal controls, and report regularly to the Board.

The Chief Executive Officer (CEO) is responsible for overseeing the practical implementation of anti-corruption measures by all departments and continuously promoting awareness of this Policy among employees at all levels.

Roles and Responsibilities of Executives

Senior executives shall set an example of integrity in business conduct (Tone at the Top), communicate this Policy to employees at all levels so that they understand it, and promote appropriate internal controls to prevent fraud and corruption within the organization.

Disclosure and Communication of the Anti-Corruption Policy

1. The Company requires the Training Department to include anti-corruption content in orientation for new employees at all levels so that they are aware of the Policy and comply with it.
2. The Company provides anti-corruption training delivered by subject-matter specialists at appropriate intervals to reinforce awareness among employees at all levels.
3. The Company publishes the Policy on its website so that the general public, customers, business partners, investors, shareholders and employees can readily access it.
4. The Company discloses the Policy in its annual report (Form 56-1 One Report) on its website, where the general public, customers, business partners, investors, shareholders and employees can readily access it.
5. The Company displays anti-corruption information boards in visible areas of its premises to promote values and attitudes that discourage employees from involvement in corruption.
6. The Company informs employees by email whenever the Anti-Corruption Policy is revised.

Whistleblowing and Complaints

The Company provides secure and confidential channels for employees and stakeholders to report observed or suspected corruption. The committee responsible for investigating misconduct is directly responsible for such reports.

Scope and Conditions for Whistleblowing and Complaints

1. A whistleblower or complainant may report misconduct or circumstances potentially amounting to corruption in breach of this Policy. A report should contain sufficient information to establish a link to facts or evidence enabling further investigation.
2. A whistleblower or complainant should not submit a report based solely on feelings without careful consideration of the relevant criteria and reasons, so that the process remains effective and credible.
3. A whistleblower or complainant may be a person subjected to unfair treatment, directly or indirectly affected by corruption, or threatened or coerced into wrongdoing by a person or group connected with the Company.

Persons Eligible to Report Concerns or Make Complaints

1. Primary stakeholders: employees at all levels, employees' families, shareholders, investors, customers, creditors and communities near the Company's premises.
2. Secondary stakeholders: the general public, competitors, and prospective customers or employees.

Whistleblowing and Complaint Channels

1. Email: ir@jasasset.co.th; whistleblowing@jasasset.co.thir@jasasset.co.thwhistleblowing@jasasset.co.th
2. Website: https://www.jasasset.co.th/th/investor-relations/corporate-governance/whistleblowinghttps://www.jasasset.co.th/th/investor-relations/corporate-governance/whistleblowing
3. Post: To the “Audit Committee”, 187, 189 J Mart Building, Ramkhamhaeng Road, Rat Phatthana, Saphan Sung, Bangkok 10240; or to “JAS Asset Public Company Limited”, 87 The JAS Ramintra Building, Room A315, 13th Floor, Lat Pla Khao Road, Anusawari, Bang Khen, Bangkok 10220.

Protection of Whistleblowers and Complainants

1. To protect their rights and safety, the Company shall keep whistleblowers' and complainants' personal information confidential.
2. The Company shall carefully investigate sensitive matters to avoid adverse effects on whistleblowers and shall treat both whistleblowers and persons complained against fairly and without discrimination.
3. Where a whistleblower or complainant has suffered harm due to fraud or corruption, the Company shall provide appropriate and fair assistance to alleviate that harm in relevant respects.

Complaint Handling Procedure

1. The Audit Committee shall regularly collect whistleblowing reports and complaints from all channels to prevent delays.
2. The Audit Committee shall classify reports and complaints in the "Annual Whistleblowing and Complaints Register".
3. The Audit Committee shall contact the whistleblower or complainant, where possible, to confirm and verify the details, recognizing that some may be anonymous or unwilling to be contacted.
4. Review attached documents and supporting evidence, if any, to assess their sufficiency.
5. If supporting materials are insufficient, the Audit Committee shall conduct an on-site review where necessary or seek additional witnesses to obtain information as fully as possible.
6. The Audit Committee shall inform the supervisor of the person complained against or the department concerned of the reported matter.
7. The Audit Committee shall contact the person or department complained against to allow them to explain the facts and ensure fairness to both sides.
8. The Audit Committee shall review the details, assess the matter and determine sanctions within 14 working days.
   - 8.1. Where no wrongdoing is found, or the matter resulted from a misunderstanding:
     - 8.1.1. The Audit Committee shall record the outcome as "No wrongdoing" in the "Annual Whistleblowing and Complaints Register".
     - 8.1.2. The Audit Committee shall notify the whistleblower or complainant of the outcome, if contact is possible.
     - 8.1.3. The Audit Committee shall prepare an outcome report for the relevant departments.
   - 8.2. Where wrongdoing is established:

8.2.1. The Audit Committee shall record the outcome as “Wrongdoing established” or “Wrongdoing partially established” in the “Annual Whistleblowing and Complaints Register” for annual statistics, state the sanction and clearly explain and document the reasons for it.

8.2.2. The Audit Committee shall prepare a “Sanctions for Misconduct” document.

8.2.3. The Audit Committee shall submit the matter to the chief executive for acknowledgment.

8.2.4. The Audit Committee shall explain the outcome to the offender's supervisor and the offender.

8.2.5. The Audit Committee shall forward the “Sanctions for Misconduct” document for signatures in the following order:

8.2.5.1. The Audit Committee signs to certify the finding of wrongdoing.

8.2.5.2. The offender's supervisor signs to acknowledge the finding.

8.2.5.3. The offender signs to acknowledge the finding.

8.2.5.4. If the offender disagrees with the outcome, they may file an objection with the Audit Committee requesting a review.

8.2.6. The Audit Committee shall notify the whistleblower or complainant of the outcome, if contact is possible.

8.2.7. The Audit Committee shall prepare an outcome report for the relevant departments.

8.2.8. If the wrongdoing involves a work process, the Audit Committee shall inform the relevant department so that it can improve the process.

Scope of Sanctions for Fraud and Corruption

The Audit Committee shall determine sanctions in each case according to the severity of the impact on the Company in the following three areas:

1. Reputational impact on public confidence in the Company.
2. Loss of Company assets or money.
3. Impact on internal work processes.

Types of Sanctions for Fraud and Corruption

1. Suspension for a specified period.
2. Compensation for losses in an amount agreed between the Company and the offender.

3. Termination of employment with the Company, with no re-employment by its subsidiaries or group companies.
4. Pursuit of legal action to the fullest extent.

Sanctions for Non-Compliance with the Anti-Corruption Policy

1. If a person subject to this Policy intentionally fails to comply and causes adverse effects on the Company, the Company may promptly consider sanctions of the types specified for fraud and corruption.
2. A person subject to this Policy cannot rely on lack of awareness of the Policy to justify corruption, as the Company communicates the Policy to employees through various channels.
3. If an employee commits wrongdoing and the employee's supervisor disregards it or fails to seek compliance with this Policy, the supervisor may face disciplinary action up to and including termination of employment.
4. If a business representative or business partner intentionally disregards or violates this Policy, the Company may terminate the contract or business transactions with that party.

Review and Revision of the Anti-Corruption Policy

The department responsible for the Anti-Corruption Policy shall update the details of each process annually or whenever a significant change occurs, and submit the revised Policy to the Board of Directors for approval.

Effective from 7 November 2025.

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Approved by: Mr. Sukon Kanjanahattakit

Chairman of the Board of Directors

Revision History

Revision	Responsible Department	Review Date	Effective Date	Summary of Changes
REV01	Investor Relations	Board of Directors Meeting No. 5/2024, 7 November 2024	20 October 2023	Annual policy review for 2024. No changes to the content; the 2023 version remained effective until the Policy was revised.
REV02	Investor Relations	Board of Directors Meeting No. 7/2025, 7 November 2025	7 November 2025	• Added definitions covering all processes • Added Oversight and Monitoring of Policy Compliance • Added Roles and Responsibilities of Executives