

Anti-Corruption Policy

Symphony Communication Public Company Limited

(Revised Edition 2025)

(Approved by the resolution of the Board of Directors' Meeting No. 6/2025 held on 14 November 2025 and takes effect from 14 November 2025 onwards.)

Anti-Corruption Policy

1. Significance

Symphony Communication Public Company Limited (hereinafter referred to as “**the Company**”) has ideology and is committed to conducting its business with honesty, fairness, transparency and accountability, while upholding social and environmental responsibility and considering the interests of all stakeholders, under the framework of good corporate governance and sound business ethics.

The Company places great importance on anti-corruption practices, recognizing that corruption is illegal, damages business credibility, and is an obstacle to the sustainability of the organization and the development of the nation. The Company, therefore, has strong intention and commitment to not accept and oppose corruption.

The Company has signed a declaration of intent and joined the “*Thai Private Sector Collective Action Against Corruption (CAC)*” initiative. Moreover, the Company has established clear Anti-Corruption Policy and Practices to serve as operational guidelines for its business conduct, strictly prohibiting personnel of the Company and its subsidiaries from engaging in, accepting, or supporting, being involved in, or participating in any actions that may be considered or constitute corruption, as well as promoting values of integrity and accountability in the performance of duties of personnel.

2. Objective

This Anti-Corruption Policy has been established to serve as a framework for the Company’s operations, with the objective of ensuring that the Company clearly defines duties, responsibilities, and appropriate practices to prevent corruption in all business activities. The policy aims to ensure that all business operations and decisions involving potential corruption risks are conducted with prudence, transparency, and in accordance with the good corporate governance principles, thereby promoting integrity, ethical conduct, and sustainable responsibility in the Company’s business operations.

3. Scope

This Anti-Corruption Policy shall apply to all business operations of the Company and its subsidiaries; and all personnel at every level within the Company and its subsidiaries are required to strictly comply with this Policy.

4. Definitions

Personnel	refer to	the Company’s directors, executives, and employees, including consultants, representatives, authorized persons, workers, or any other individuals who perform work on behalf of or act in the name of the Company.
Subsidiary	refers to	a company having any of the following characteristics:

		<ol style="list-style-type: none">(1) a limited company or a public limited company in which the Company owns or holds, directly or indirectly, more than fifty percent (50%) of the voting shares; or(2) A limited company or a public limited company over which the Company has the power to control the financial and operating policies in order to obtain benefits from the activities of such company or legal entity.
Fraud	refers to	any act committed to obtain an unlawful or improper benefit for oneself or others.
Corruption	refers to	offering, promising, providing, or agreeing to provide a bribe to any government or private sector official, representative, or organization, whether directly or indirectly, in order to improperly influence such person to act or refrain from acting in the performance of their duties for the purpose of obtaining or retaining any undue benefit. Corruption also includes receiving or soliciting a bribe by any government or private sector official, representative, or organization, whether directly or indirectly, in order to improperly influence such person to act or refrain from acting in the performance of their duties for the purpose of obtaining or retaining any undue benefit.
Bribe	refers to	any gift, reward, incentive, or other benefit, whether monetary or non-monetary, including any remuneration or facilitation payment, that is intended to influence or induce a person to act, or refrain from acting, in the performance of their duties for the purpose of obtaining or retaining any undue benefit.
Gift	refers to	money or any non-monetary item given as a gesture of goodwill on various occasions.
Other benefit	refers to	anything of value, whether or not it can be monetarily quantified, such as discounts, entertainment, services, training, or any similar form of benefit
Charitable donation	refers to	the provision of money, goods, services, or any other contribution to organizations or entities for charitable or public benefit purposes aimed at supporting society, communities, or those in need, without seeking any benefit or return in exchange.
Sponsorship	refers to	money provided to customers, suppliers, business partners, or other stakeholders for commercial

		purposes, or to promote business relationships, reputation, and the positive image of the Company.
Political contribution	refers to	providing support to any political party, political coalition, political authority, or political candidate, whether monetary or non-monetary, directly or indirectly. This includes activities such as advertising, lending or donating equipment, and providing technology services free of charge, etc.
Political participation	refers to	participating in political activities, whether directly or indirectly.
Facilitation payment	refers to	informal payments which are made to government or private sector officials, representatives, or agencies to expedite routine administrative processes or to facilitate the performance of their regular duties.
Conflict of interest	refers to	any situation or action in which personal interests interfere with, or could interfere with, the impartiality of decision-making or the proper performance of duties as company personnel, as a result of prioritizing one's own interests or the interests of others over those of the company.
Stakeholder	refers to	any person, group of persons, or legal entity that is directly or indirectly affected by the Company's or its subsidiaries' business operations, or that has any interest in the business operations of the Company or its subsidiaries, or that has influence over person or entity in a manner that may impact the business operations of the Company or its subsidiaries. Stakeholders include, but are not limited to, employees, customers, suppliers, business partners, shareholders, investors, creditors, competitors, government agencies, regulatory authorities, as well as communities and society at large.
Supplier	refers to	any supplier or vendor of goods and services to the Company, including professional consultants, designers, contractors, subcontractors, service providers, lessors, or leasing providers.
Business partner	refers to	any business organization or legal entity that collaborates with the Company by leveraging each party's strengths in resources, expertise, or customer base in order to achieve shared business objectives. Such collaboration may include, but is not limited to, the development of products and services, innovation

creation, sales growth, risk and cost reduction, market expansion, capability enhancement, or the creation of competitive advantage.

5. Roles, Duties and Responsibilities

To ensure that the Company implements comprehensive anti-corruption practices across the entire organization and maintains clear oversight, the Company has defined roles, duties, and responsibilities to relevant units and personnel as follows:

- 5.1 **The Board of Directors** has the duty and responsibility to define and approve the anti-corruption policy and measures, oversee to ensure that the Company has an effective system to support anti-corruption, and demonstrate leadership and commitment to oppose all forms of corruption, to ensure that the personnel are aware of and place importance on anti-corruption, fostering it into the corporate culture.
- 5.2 **The Nomination, Compensation, Corporate Governance and Sustainability Committee** has the duty and responsibility to deliberate anti-corruption policy and measures and presenting them to the Board of Directors for approval, including regularly reviewing the adequacy and appropriateness of such policy and measures and provide recommendations to the Board for improvement to ensure they remain up to date, comply with relevant rules, regulations, and legal requirements, and operate with enhanced effectiveness.
- 5.3 **The Audit Committee** has the duty and responsibility to review the financial reports to ensure they comply with applicable standards and are complete, accurate, transparent, and verifiable; to review that the Company has appropriate, robust, sufficient, and effective internal control systems, internal audit systems, and risk management systems; and to review that the Company's operations comply with laws, regulations, and the anti-corruption policy.
- 5.4 **The Risk Management Committee** has the duty and responsibility to oversee and ensure that the Company has an adequate, appropriate, and effective risk assessment and management in place.
- 5.5 **The Chief Executive Officer** has the duty and responsibility to ensure the systematic implementation of anti-corruption efforts, establish operational procedures related to anti-corruption, support the communication, education, and creation of understanding regarding the anti-corruption policy, measures, and procedures for management and employees at all levels, oversee and monitor the implementation of the established policy, measures, and procedures, as well as communicate and promote the Company's role in anti-corruption to relevant stakeholders.
- 5.6 **The Risk Management Department** has duty and responsibility to assess corruption risks in all business processes across the entire organization, establish measures and guidelines to prevent corruption risk, and implement appropriate risk management practices.

- 5.7 **The Internal Audit Department** has the duty and responsibility to audit and review the Company's operations to ensure compliance with the anti-corruption policy and measures, delegated authority, operational procedures, laws, and regulatory requirements applicable to the Company. It shall ensure that the Company has an appropriate and adequate internal control system to address potential corruption risks and shall regularly and promptly report audit results and any urgent issues identified to the Chief Executive Officer and the Audit Committee.
- 5.8 **Executives and Employees** have the duty and responsibility to study, understand, and strictly comply with the Company's anti-corruption policy, measures, and operational procedures, as well as all relevant rules, regulations, and laws. In case where there are any doubts or observation of actions that violate the anti-corruption policy, measures, or procedures, or any behavior that may constitute corruption, they must report such matters to their supervisors or through the Company's established whistleblowing and complaint channels.

6. Practical Guidelines

- 6.1 The Company is committed to cultivating and maintaining a corporate culture that upholds the principle that corruption is unacceptable in all business transactions with both the public and private sectors, whether directly or indirectly.
- 6.2 The Company stipulates that it is the duty and responsibility of all personnel to acknowledge and comply with the Anti-Corruption Policy, measures, and procedures as well as Business Code of Conduct. Furthermore, supervisors at all levels are required to oversee, emphasize the importance, and encourage employees under their supervisions to gain proper knowledge, understanding, and to strictly comply with the anti-corruption policy, measures, operational procedures, and the Business Code of Conduct.
- 6.3 Company personnel must exercise due care when giving or receiving gifts, hospitality, or other benefits. Such actions must comply with the best practices stipulated in the Business Code of Conduct and the Company's regulations on giving and receiving gifts, hospitality, or other benefits.
- 6.4 Charitable donation and sponsorship must be made in the name of the Company and solely for the purpose of supporting society or promoting the business and positive image of the Company. All activities must be conducted with transparency, must not serve as a channel for fraud or corruption, and must adhere to the procedures and best practices stipulated in the Business Code of Conduct and the Company's regulations on charitable donation and sponsorship.
- 6.5 The Company maintains political neutrality and has no policy to provide financial support, resources, assets, or any form of assistance, whether directly or indirectly, to politicians, political influencers, political parties, or political groups. Company personnel are entitled to political rights and

freedoms to engage in political participation and activities under the law; however, they must refrain from undertaking any political actions or activities within the Company premises or using any of the Company's resources for political purposes that may cause the Company to lose its political neutrality or suffer damage from becoming involved in or providing political contribution. Furthermore, Company personnel should avoid serving as committee member or representatives of political parties.

- 6.6 The Company has a zero-tolerance policy regarding facilitation payments in any form, whether direct or indirect. The Company will neither engage in nor tolerate any actions in exchange for the expedition of business operations.
- 6.7 Company personnel must avoid any act that constitutes a conflict of interest with the Company. Any action taken must be reasonable, and based on acting in the Company's best interest, and must not violate relevant laws and regulations.
- 6.8 Business relationships and procurement activities with government or private sectors, including contact with government or private entities or officials, as well as any persons involved in the Company's business operations, must be conducted with integrity, transparency, and in compliance with all applicable laws, regulations, requirements, and procedures.
- 6.9 In the case of engaging any third party to act on behalf of or in the name of the Company, the relevant personnel of the Company must inform and ensure that such individuals are aware of the Business Code of Conduct, the Anti-Corruption Policy, and all related measures and regulations of the Company. The terms of engagement must be transparent, appropriate, in compliance with the law, and must not lead to fraud or corruption.
- 6.10 The Company has established human resource management policies and processes covering recruitment and selection, promotion, training, performance evaluation, and compensation to reflect a strong commitment to fraud prevention and anti-corruption practices.
- 6.11 The Company implements measures for preventing corruption risks in both operational and financial aspects and ensures that the results of the assessment and management are reported to the Chief Executive Officer, the Risk Management Committee, and the Board of Directors.
- 6.12 The Company conducts an assessment and audits of the internal control system and reports the results of the internal control assessment as well as any issues identified from the internal audits to the Chief Executive Officer, the Audit Committee, and the Board of Directors.
- 6.13 The Company provides channels for complaints and whistleblowing to receive complaints from stakeholders who have been affected by the Company's business operations or by the performance of Company personnel regarding violations of law, the Business Code of Conduct, the anti-corruption policy and measures, including any behavior that may indicate fraud or corruption.

- 6.14 Upon becoming aware of or witnessing misconduct or actions that may constitute fraud or corruption related to the Company, Company personnel must not ignore or overlook the matter. They must promptly report it to their direct supervisor, or a trusted supervisor, or the responsible designated person, or file the clue or evidence through the Company's complaints and whistleblowing channels. Personnel must also cooperate in the factual investigation. If there are any doubts or queries, personnel should consult with their supervisor or the person designated by the Company to oversee the compliance with the Anti-Corruption Policy and measures, and the Business Code of Conduct.
- 6.15 The Company shall provide appropriate and fair protection to personnel or any other persons who report clues or evidence of fraud or corruption related to the Company. Such protection will be carried out in accordance with the Company's regulations on complaint and whistleblowing handling system.
- 6.16 The Company is committed to ensuring that no personnel will be demoted, disciplined, or subjected to any negative consequences for refusing to engage in corruption, even if such refusal may result in the loss of business opportunities.

7. Violation of the Policy and Disciplinary Actions

The Company shall impose disciplinary actions in accordance with its rules and regulations on any personnel who violate or fail to comply with this Policy. This includes supervisors who neglect to address misconduct or who are aware of such violation but fail to take appropriate corrective action. Disciplinary actions may include verbal warnings, suspension, or termination of employment, and/or legal proceedings if the act constitutes a violation of law. Lack of awareness of this Policy and/or relevant laws shall not be accepted as an excuse for non-compliance.

In cases where individuals associated with the Company, or customers, business partners, or other stakeholders fail to comply with the Company's Anti-Corruption Policy and measures, the Company may consider terminating business transactions with such individuals or parties.

8. Other Related Policies and Regulations

The Company's personnel are encouraged to study and understand this Policy in conjunction with the Company's other policies as follows:

- Corporate Governance Policy
- Business Code of Conduct
- Sustainable Development Policy
- Connected Transactions Policy
- Procurement Policy
- Company's Regulations on Giving and Receiving Gifts, Hospitality, or Other Benefits

- Company's Regulations on Donations and Sponsorships
- Company Regulations on Whistleblowing and Complaints Handling System

9. Policy Communication and Dissemination

The Company provides continuous communication and education regarding its Anti-Corruption Policy, measures, and related practices to all personnel through orientation programs, training sessions, meetings, and other appropriate activities. This aims to ensure that employees fully understand and correctly implement the Company's Anti-Corruption Policy. In addition, the Company communicates and disseminates this Policy and its measures to relevant stakeholders and the general public through various communication channels to encourage cooperation and promote collective commitment in supporting and upholding the Company's anti-corruption stance.

10. Policy Review and Revision

The Company's Anti-Corruption Policy shall be reviewed regularly, at least once a year, to ensure its alignment with changes in the business environment, social and environmental context, as well as relevant laws, standards, and best practices. The review aims to continuously enhance the Policy's effectiveness and practical application. Any amendment or revision to this Policy shall be reviewed and endorsed by the Nomination, Compensation, Corporate Governance and Sustainability Committee, and subsequently approved by the Board of Directors prior to implementation.