



Anti-Fraud and Anti-Corruption Policy

The Platinum Group Public Company Limited

Anti-Fraud and Anti-Corruption Policy

The Platinum Group Public Company Limited and its Subsidiaries (“the Company”) operates its business with a value of zero tolerance to fraud and corruption. The Company adheres to the highest standard of moral and ethical values and principles and is committed to transparency and accountability in business management for benefits of all stakeholders. Additionally, the Company has joined “**Thai Private Sector Collective Action Against Corruption (CAC)**” with a declaration of intent and commitment to focus on anti-fraud and anti-corruption.

The Company has determined the responsibility, the practical way and any other regulations in order to prevent any fraud or corruption in every single activity of the Company. This policy will be implemented and directed to consider or make decision regarding business risks in part of fraud and corruption provisions, as a result, the Company has established this “**Anti-Fraud and Anti-Corruption Policy**” in form of the code so as to be the guidelines of business operation.

1. Definition

Fraud or Corruption means bribery in every form; any offers, promises to grant the request, requests, demands, the act of taking or receiving monetary or material benefits or intangible benefits inappropriately; as well as any dishonest collusive actions with third parties i.e., government officials, direct or indirect responsible persons or officers in other private organizations by abusing an entrusted power to perform or omit to perform their duties for personal or business interest. The only exception is when such act is allowed by laws, regulations, announcements or cultural traditions and norms.

2. Anti-fraud and Anti-corruption Policy

All directors, committee members, management and employees of the Company are prohibited from performing or accepting fraudulent or corruption attempts in any forms, directly or indirectly, in all aspects of the Company's businesses. Monitoring on compliance with the anti-corruption policy shall be made on regular basis. Guidelines, procedures and practices defined in this policy shall be consistently reviewed to ensure compliance with changes in business, regulatory, article of association and any legal requirements.

3. Duties and Responsibilities

1. Board of Directors is responsible for setting policy and monitoring the system which support the prevention and protection against fraud or corruption effectively, ensuring that management is well recognize and focus on the anti-fraud or anti-corruption including develop its to be the culture of the Company.
2. The Audit Committee has duties and responsibilities to review and ensure that the Company's accounting and financial reporting system and internal control system incorporating measurements to prevent and detect fraud and corruption activities.

3. The Executive Committee and the President are responsible for determining the system and support the anti-fraud and anti-corruption policy and communicate to all employees and all related parties and also be responsible for consistently reviewing this policy to ensure that it is align with changes in business, regulatory, article of association and any legal requirements.
4. Head of Internal Audit Division has duties and responsibilities to check and monitor work processes and operational practices to ensure compliance with policies, procedures, regulations, article of association and legal requirements; and to ensure that control functions and internal audit of the Company are complied with anti-fraud and anti-corruption policy or corrupt; and to report any incidents or findings directly to the Audit Committee.

4. Guidelines and Procedures

1. The Board of Directors, members of Committees, executives and employees at all levels must comply with the anti-fraud and anti-corruption policy in strictly. Notwithstanding, they shall not involve to any fraud or corruption both of direct or indirect;
2. The Board of Directors, members of Committees, executives and employees at all levels shall not neglect or ignore when exposed to any practice that is, or is reasonably suspected of fraud and/or corruption; they must promptly report to responsible work units and be co-operative in the investigation process;
3. The Company will ensure fairness and protect employees who refuse to participate in the fraudulent and/or corruption scheme, and who report fraud and/or corruption incidents by using whistleblower protection measures;
4. The Company shall take disciplinary actions in accordance with the Company's rules and regulations to those who commit fraud or corruption and that person may be penalized by the existing laws if it is the legal offences;
5. The Company shall disseminate, communicate and educate to all related parties the knowledge, regulations and restrictions regarding the anti-fraud and anti-corruption policy in order to comply that policy;
6. The Company shall continue to build a corporate culture of integrity and zero tolerance to fraud and/or corruption in its relationship with external parties both the public and private sectors.
7. This anti- fraud and anti- corruption policy covers the Company' s personnel management processes regarding the recruitment and selection of personnel, promotion, training, performance evaluation and compensation. Supervisors at all levels shall communicate to their staff to comply with the policy and its rules and regulations;
8. For clarity purpose, when performing their duties in the area that is sensitive or related to fraud or corruption, the Company has set out the guidelines and the consideration process for the directors, members of committees, executives and employees at all levels to carry out business operation with carefully manners as contained below:

8.1 Gift, memento, entertainment and expenses of the same nature

Giving or receiving gifts, mementoes, entertainment and expenses of the same nature shall comply with the Company's Code of Conduct.

8.2 Donation for charity or supporting fund

Giving or receiving cash donation or supporting fund must be transparent and lawful and without the intention of convincing other parties to undertake inappropriate actions.

8.3 Business relationship with public sector

Do not give or receive bribes for any businesses and transactions in all countries and all agencies involved with the Company. Any contacts with governmental offices must be transparent and in accordance with the laws.

8.4 Political association

The Company is neutral in matters of politics without advocating any parties. The Company respects the rights, under the constitution, of its directors, members of committees, executives and employees at all levels to participate in political activities. However, those actions of such persons shall not affect the roles and responsibilities with the Company and the need to comply with the relevant law.

This Anti-Fraud and Anti-Corruption Policy (Revision) has been reviewed and approved by the Company's Board of Directors meeting no. 4/2025 on November 11, 2025 with effective date from November 11, 2025 onwards.

-Mr. Palakorn Suwanrath-

Mr. Palakorn Suwanrath

Chairman of the Board of Directors

Date November 11, 2025