

Anti-Corruption Policy

AddTech Hub Public Company Limited (the “Company”) realizes the importance of management and business operations under the principles of good corporate governance by adhering to the principle of operating the business with honesty and transparency. The Company therefore establishes the Anti-Corruption Policy for the directors, executives and employees of the Group to avoid any conduct that may be related to fraud and corruptions in all forms whether for a direct or indirect benefits of oneself, one’s family or an involved close person. In addition, the Company has established an organizational structure that clearly divides duties, responsibilities, work processes and chains of command in each department so that there is an appropriate balance of power and tight checks and balances among one another.

1. Definitions

Corruption refers to actions or omissions in performance of duties or exercising powers under the duty wrongfully to seek unduly benefits in various forms whether giving or accepting bribes, offering, promising to offer, requesting or demanding money, properties or any other benefits that are unsuitable for government officials, government agencies, private entities or any other person who conducts business with the Company in order for such person to perform or refrain from performing duties for the purpose of obtaining a business or for any other improper business benefits, except where it is permitted by laws, rules, announcements, regulations, local customs or trade customs.

2. Duties and responsibilities

- 2.1 The Board of Directors is responsible for formulating policies and supervising the implementation of an effective anti-corruption support system so that all employees in the company understand and realize the importance of anti-corruption and cultivate it as a corporate culture.
- 2.2 The Audit Committee is responsible for reviewing financial and accounting reports, internal control systems, internal audit systems and risk management systems and ensuring the appropriateness and efficiency, as well as receiving the whistleblowing of corruption which arises from people in the organization, being involved in the investigation of facts and submitting the matter to the Board of Directors to jointly consider punishing or finding solutions to such problems.
- 2.3 The Sustainability Management Team is responsible for overseeing, advising and monitoring compliance with the Corporate Governance Policy, Code of Conduct and Anti-Corruption Policy.

2.4 The Risk Management Team is responsible for conducting an assessment of risks associated with corruption as well as establishing measures and guidelines to prevent corruption risks to propose to the Audit Committee and the Sustainability Management Team.

2.5 The Executive Committee, managing director and executives are responsible for implementing the Anti-Corruption Policy by establishing a system to support the Anti-Corruption Policy and communicate it to all employees and related parties including reviewing the appropriateness of systems, policies and measures to comply with changes in business, rules, regulations and legal requirements.

3. Anti-Corruption Policy and Guidelines

The Board of Directors, executives and employees of the AddTech Hub Public Company Limited Group must strictly adhere to the Anti-Corruption Policy and must refrain from getting involved in all forms of corruption, both directly or indirectly, as follows:

3.1 Do not engage in any behavior that expresses the intent of corruption, giving or accepting bribes to government and private officials, or stakeholders associated with the Company in order to obtain or maintain a business or competitive advantage or for the benefit of oneself and those involved.

3.2 Do not ignore or neglect when seeing actions deemed as corruption which are related to the Company. It is considered a duty to notify the supervisor or responsible person and cooperate in the investigation of facts.

3.3 The Company will provide fairness and protection to persons who refuse corruption or report corruption clues to the Company as stipulated in the measures to protect complainants or those who cooperate in reporting corruption.

3.4 Those who commit corruption, which is an unethical conduct, will be subject to disciplinary action in accordance with the regulations set by the Company and may be subject to legal penalties if such actions are illegal.

3.5 The Company is aware of the importance of disseminating knowledge and understanding to persons who have to perform duties related to the Company or may affect the Company in matters that must be complied with this Anti-Corruption Policy.

3.6 The Company has established appropriate and efficient audit processes and internal control systems on an ongoing basis to prevent corruption and for operational efficiency and to reduce risks from the nature of the business. An appropriate internal control system consists of both preventive control and detective control, which are tools that help to reduce the

likelihood and incentives for wrongdoing and corruption, where there are criteria for separating work duties. In addition, there is a follow-up evaluation process whereby management is promptly reported and informed of the causes of defects or unusual circumstances as well as being able to appropriately improve the system in a preventive manner in evaluating the said internal control system, the process of which the Internal Audit Department is a crucial part.

3.7 The Company provides a human resource management process that reflects the Company's commitment to anti-corruption measures from recruitment, training, performance evaluation, compensation and promotion.

3.8 In order to clarify the operation in matters that pose a high risk of corruption, the Company directors, executives, and employees at all levels of the Group must perform their duties with caution in the following matters:

3.8.1 The giving or receiving of gifts and entertainment must be carried out in a manner that is transparent, lawful, in accordance with the general trade customs or traditions at reasonable value.

3.8.2 Giving or receiving donations or sponsorships must be carried out in a manner that is transparent and lawful, ensuring that the giving or receiving of such donations or sponsorships does not mask bribery.

3.8.3 The business operations, dealings, negotiations, bidding and other actions with government or private entities must be carried out in a transparent and lawful manner. In addition, directors, executives and employees of the Group must not give or accept bribes at all stages of business operations.

4. Measures and channels for whistleblowing or submitting complaints

The Company provides measures for whistleblowing or complaints regarding illegal actions, violations of the Code of Conduct or behaviors that may imply corruption of directors, executives or employees of the Group. Various communication channels have been established to allow employees and stakeholders to report clues or complaints to the Company conveniently and appropriately. The whistleblower or the complainant must specify the details of the matters of which clues and complaints they are submitting along with their names, addresses and telephone numbers that are reachable to the communication channels specified by the Company.

4.1 Channels for receiving whistleblowing or corruption complaints

- By E-mail to Audit Committee: audit.committee@addtechhub.com

- Via Company's website: www.addtechhub.com

4.2 Measures to protect and maintain confidentiality

In order to protect the rights of complainants and informants acting in good faith, the Company will conceal names, addresses or any information that can identify the complainants or informants and keep the information of the complainants and informants confidential. Such information will be accessible only to those who are responsible for investigating complaints.

In the event of corruption complaints on executives, the Audit Committee will be responsible to protect whistleblowers or complainants, witnesses and persons who provide information in the investigation of the facts from any suffering, harm or injustice arising from whistleblowing, complaints, witnessing or providing information.

Persons responsible for the performance of duties related to complaints are responsible for keeping information, complaints and documentary evidence of complainants and informants confidential. It is prohibited to disclose information to persons whose duties are unrelated, unless the disclosure is required by duty as stipulated by law.

5. Investigation procedures and penalties

5.1 Upon receipt of a whistleblowing, the Audit Committee will assign an internal auditor or appoint a fact investigation committee to moderate the investigation and notify the investigation results to the whistleblower or the complainant periodically.

5.2 If the investigation reveals that the information or evidence obtained gives reasonable grounds to believe that the alleged person was actually involved in corruption, the Company will grant the accused person the right to be informed of the allegations and to defend themselves by providing additional information or evidence demonstrating that they were not involved in the alleged corruption.

5.3 If the accused was actually engaged in the act of corruption, whether the person is a director, executive or employee, he or she is considered to have violated the Company's Anti-Corruption Policy and Code of Conduct and will be subject to disciplinary action according to the regulations set by the Company. If the act of corruption is against the law, the offender may be subject to legal penalties as well. In this regard, the disciplinary action according to the Company's regulations and the decision of the Audit Committee are deemed final.

The Company has no policy of demoting, penalizing or negatively affecting employees who reject corruption, even if doing so would cost the Company a business opportunity.

6. Training and communication

6.1 The Company arranges to provide communication and dissemination of Anti-Corruption Policy, including channels for whistleblowing or complaints to personnel within the Company for acknowledgement through various channels such as orientation for new directors and employees, posting announcements in public relations boards, e-mails or Company websites, in order for everyone in the Company to understand, agree and abide by the Anti-Corruption Policy seriously.

6.2 The Company communicates and disseminates Anti-Corruption Policy including whistleblowing or complaint channels to the public, subsidiaries, associates, as well as business representatives, related business partners and stakeholders through channels such as the Company website, Annual Report and Annual Registration Statement, to create understanding and promote compliance with social responsibility standards for anti-corruption in the same manner as the Company.

This Anti-Corruption Policy has been considered and approved by the Board of Directors' Meeting No. 2/2024 on 6 March 2024 and is effective immediately.