

The Anti-Corruption Policy

NFORCE-PL-MGT-020

On August 14, 2020

nForce Secure Public Company Limited (“**The Company**”) recognizes the importance of anti-corruption and is committed to conducting business with integrity within the framework of good corporate governance based on good governance principles, social responsibility, the environment, the code of conduct and business ethics. All stakeholders conduct business with transparency, fairness and accountability.

To ensure that the Company has appropriate policies, responsibilities, practices and operating requirements to prevent corruption in all its business activities and to make decisions and business operations that are reasonable. There may be writing as a clear practice guideline in business operations and to grow into a long-term organization.

1. Definition

"Corruption" means the wrong use of **authority** and duties to obtain undeserved benefits. Bribery, in any form, is defined as offering, promising, demanding, giving, or accepting money, property, or any other illegal benefit to a government official, a government agency, a private agency, or those who have duties, whether directly or indirectly, for such person to act or refrain from acting or to obtain or maintain an improper business interest.

"Charity" means an activity that involves spending money without tangible rewards.

"Public benefit donation" means spending money for projects, activities to benefit the community, society, and people, whereby the Company may not receive tangible returns.

"Political Contributions" means any contribution on behalf of the Company, whether financial or otherwise, to support political activities. Financial aid can include money lending. Other forms of assistance (in-kind), such as giving things or services, political

advertising promoting or endorsing a political party, buying tickets for events organized to raise funds or donate money to organizations that have close ties with political parties, etc., except in support of the democratic process that is permitted by law.

"**Sponsorships**" are payments made for services or benefits that are difficult to measure and monitor. For example, subsidies may have a hidden purpose, which may be linked to bribery. Using sport for charity or charity as a front to create an advantage in the consideration of government officials or related parties (Examples of advantages to consider include contracts, business opportunities, or auctions; reducing or eliminating fees; assisting or eliminating the requirements for licenses that are invalid under the normal government decision-making process. Revocation or reduction of legal requirements, as well as providing or assisting in gaining access to government officials).

"**State Officials**" means "State Officials" as defined in the Anti-Corruption Laws and shall include: civil servants, officials, state enterprise employees, employees, an agent, or any other person acting on behalf of the following entities:

- Ministries, bureaus, departments, or government agencies (such as the Customs Department, the Immigration Office, etc.)
- International organizations (such as World Bank, International Monetary Fund, etc.)
- Political party, political office holder or candidate (both government and opposition parties), local administrators
- Regulatory authority (such as the Securities and Exchange Commission Bank of Thailand, Stock Exchange of Thailand, etc.)
- State enterprises, companies or other organizations owned or controlled by the state or government agencies

2. Anti-Corruption Policy

- 2.1 Directors, executives, and employees of the Company shall not demand action or accept any form of corruption, either directly or indirectly, for the benefit of the organization, themselves, their family, friends, and acquaintances, or the benefit of the business, covering all businesses in all countries and all relevant departments of the Company.
- 2.2 The Company is required to regularly review compliance with this anti-corruption policy and review practices and operating requirements to reflect changes in business, regulations, and legal requirements. If there is any violation of any act to support, assist or cooperate with corruption, it will be punished according to the rules of the Company. In addition, it may be punished by law if the act is illegal.

3. Duties and Responsibilities

- 3.1 The Board of Directors is responsible for formulating and approving anti-corruption policy and good corporate governance policy by establishing a system that supports effective anti-corruption to ensure that the executives are aware of its importance and has implemented it as a corporate culture.
- 3.2 The Audit Committee is responsible for reviewing the Company's internal control systems, including financial and accounting reporting systems, internal control systems, internal audit systems, and risk management systems, and reviewing operations to ensure compliance with anti-corruption policy, relevant regulations, and laws. According to international standards, it is concise, suitable, modern, and efficient.
- 3.3 The Chairman of the Executive Committee, the working group, and the executives are responsible for establishing the system. Promote, support, and supervise to ensure that employees and all related parties comply with anti-corruption policy

regulations, including reviewing the suitability of systems and measures to be consistent with the change in business, regulations, and legal requirements.

- 3.4 The Internal Audit is responsible for auditing and reviewing the operation to ensure that it is following policies, guidelines, regulations, and relevant laws to ensure that there is an appropriate and sufficient internal control system in place to reduce the risk of corruption that may occur and report it to the Audit Committee.
- 3.5 Directors, executives, and employees are obliged to comply with the anti-corruption policy without being involved in corruption, either directly or indirectly.
- 3.6 Subsidiaries, associates, or business representatives of companies controlled by the Company shall agree to comply with the Company's anti-corruption policy.

4. Scope and Guidelines

- 4.1 The Company requires directors, executives, and employees at all levels to act carefully against corruption patterns as follows:
 - 4.1.1 Giving and Receiving Bribes

Giving or accepting bribes in any form in return for a business benefit is prohibited, as is authorizing others to give or accept bribes on your behalf.
 - 4.1.2 Business Relationship and Procurement with the Government Sector

The Company's operations and dealings with government sectors shall be transparent, honest, and per relevant laws.
 - 4.1.3 Gifts, Entertainment and Other Benefits

Giving or accepting gifts, assets, entertainment, or any benefits from customers, business partners, or those related to the Company shall comply with the Company's regulations.
 - 4.1.4 Political Assistance

The Company has a policy of not supporting political parties, political groups, or politicians whether directly or indirectly.

4.1.5 Receiving donations, charitable contributions, public interest, and giving or receiving grants:

The Company stipulates that accepting donations for charitable donations and giving or receiving financial support shall comply with the following requirements:

1. It shall be transparent, legal, and not contrary to morals, nor any action that will have a detrimental effect on society as a whole.
2. It shall not be associated or used as an excuse for bribery.
3. Procedures for reviewing and approving charitable contributions, public benefits, or sponsorships shall be followed per the Company's regulations.
4. If there is any doubt that it may affect the law, consult the Legal Department in writing for important matters at the management's discretion.

4.2 The Company is committed to creating and maintaining an organizational culture that believes corruption is unacceptable in public and private transactions.

4.3 Company directors, executives, and employees at all levels should not ignore or ignore when they see actions that are considered corrupt related to the Company. They shall inform their supervisors or responsible persons for acknowledgment and cooperate in the investigation of various facts. This includes providing channels for receiving complaints from third parties following the complaints and whistleblowing policy and corruption regulations set by the Company.

4.4 The Company shall provide fairness and protection to employees who refuse to commit corruption or report corruption related to the Company. The Company will not demote, penalize, or adversely affect employees who refuse to commit corruption, or those who cooperate in reporting corruption following the

Company's policy, even if doing so will cause the Company to lose business opportunities.

- 4.5 Directors and executives at all levels of the Company shall demonstrate integrity and set a good example in the implementation of the anti-corruption policy by requiring the Company Secretary and the Human Resources Department to be responsible for disseminating knowledge, creating understanding, and encouraging employees at all levels to adhere to the anti-corruption policy seriously and continually strengthen it as part of the corporate culture.
- 4.6 The anti-corruption policy extends to personnel management process from recruiting or selecting personnel to promotion, training, and evaluation of employee performance by requiring supervisors at all levels to communicate with employees, understand employees, use them in their responsible business activities to oversee the effective implementation of the policy.
- 4.7 Any action taken in accordance with the anti-corruption policy should use the guidelines set the good corporate governance policy, including the regulations and operating manuals of the Company concerned, as well as any other guidelines that the Company will establish in the future.
- 4.8 The Company requires public relations for the anti-corruption policy through both internal and external media, such as the announcement of the Company's website and the annual report. The following policy is a practice under the laws of Thailand against corruption.

5. Cases Involving Information or Allegations of Corruption

- 5.1 Seeing corruption acts directly or indirectly related to the organization, such as seeing individuals in the organization bribing or grabbing government officials or private agencies.
- 5.2 Seeing an act that violates the procedures according to the Company's regulations or affects the Company's internal control system leads to the suspicion that it may be a channel for corruption.
- 5.3 Seeing actions that cause the company to lose benefits which affects the reputation of the company
- 5.4 Seeing unlawful, immoral, or unethical conduct of the Company's business and business ethics.

6. Channels for Receiving Information or Complaints of Corruption

The Company provides channels for complaints, whistleblowing, or expressing opinions so that employees and all stakeholders can file complaints, report information, or express opinions to lead to personnel development and management through the following channels:

- 6.1 **Email:** auditcommittee@nforcesecure.com
- 6.2 **Postage:** Specify the front of the envelope to Chairman of the Audit Committee
By sending to the Company's head office location: nForce Secure Public Company Limited (Head office) No. 9/2, The Synchronized Project, Soi Ratchadaphisek 18, Ratchadaphisek Road, Huai Khwang Sub-district, Huai Khwang District, Bangkok 10310
- 6.3 **Website:** <https://www.nforcesecure.com/>

If the informant or whistleblower has a complaint, the Chief Executive Officer or the Executive Committee requests that the complaint be directed to the Audit Committee Chairman.

All groups of stakeholders in the Company can report clues or complaints about corruption, namely shareholders, customers, competitors, creditors, government sectors, communities, society, executives, and employees of the Company will notify in any of the aforementioned ways. The Company will keep maintaining individuals' confidentiality.

7. Measures to Protect and Maintain Confidentiality

To protect the rights of petitioners and informants acting in good faith, the Company will conceal names and addresses or any information that can identify the complainant or the information provider and keep the details of the complainant or informant confidential, limited to only those responsible for the investigation of the complaint.

In the event of complaints to the Chief Executive Officer and/or the Executive Committee, the Audit Committee shall act to protect the whistleblowers or complainants, witnesses, and people who provide information in the investigation from harm or any unrighteousness arising from the whistleblower's actions, whether they file a complaint as a witness or provide information by requesting the complainant to send the complaint directly to the Audit Committee.

- The Chief Executive Officer shall exercise discretion as he deems appropriate to protect whistleblowers, or the complainant, the witness, and the person providing information in the investigation to avoid any danger, danger, or unjustification arising from the whistleblowing, witnessing or providing information.
- The Chief Executive Officer can assign tasks to any of the executives to act in his discretion to order the protection of the safety of whistleblowers or whistleblowers, witnesses, and people who provide information. The assigned executives shall not be involved in any matter that has been informed of clues or complaints, directly or indirectly (i.e., the accused is directly subordinate to his or her supervisor).

In this regard, the person receiving information from the performance of duties related to the complaint shall keep the complaint information and documentary evidence of the complainant and the information provider confidential. Do not disclose the information to other people who are not involved unless it is disclosed per the duty as mandated by law,

8. Investigation Procedures and Penalties

- 8.1 Upon receiving the information, the Chief Executive Officer, the Executive Committee, and/or the Audit Committee will moderate and investigate the facts.
- 8.2 During an investigation, the Chief Executive Officer, the Executive Committee, and/or the Audit Committee may assign agents to periodically report progress to the whistleblower or petitioner.
- 8.3 If the investigation of the facts reveals that the information or evidence has reasonable grounds to believe that the accused person committed corruption, the Company shall have the right to inform the accused of the allegation and the defendant's right to prove himself/herself by obtaining additional information or evidence showing that he was not involved in the alleged corruption.
- 8.4 If the accused has committed corruption, it is considered a violation of the Company's anti-corruption policy and business code of conduct, and business ethics. The accused will be subject to disciplinary action following the regulations. If the Company has determined that corruption is an offense under the law, the offender may be subject to legal penalties. However, the Chief Executive Officer shall have the final decision on disciplinary action according to the Company's rules.

In the case of complaints against the Chief Executive Officer or the Executive Committee, the Audit Committee is responsible for collecting information and investigating facts as necessary to report to the Board of Directors for joint consideration and determination of penalties as deemed appropriate.

9. Publication of Anti-Corruption Policy

For everyone in the organization to be aware of the anti-corruption policy, the Company will proceed as follows:

- 9.1 The Company posts an anti-corruption policy in a prominent place that everyone in the organization can read.
- 9.2 The Company publishes its anti-corruption policy through its communication channels such as the company website, email, annual report, annual disclosure report (56-1), etc.
- 9.3 The Company will provide training on anti-corruption policy to all new employees.
- 9.4 The Company will regularly review the anti-corruption policy at least once a year.

The Anti-Corruption Policy is approved by the Board of Directors Meeting No.5/2020 on August 14, 2020 and is effective from August 14, 2020.