Anti-Fraud and Anti-Corruption Policy and Guidelines

รวมพลังต่อต้าน
การทุจริตคอร์รัปชัน

IT CITY

IT CITY Public Company Limited

Anti-Corruption Policy

We, IT CITY Public Company Limited, are committed to conducting business honestly, transparently, fairly, responsibly and cautiously under applicable laws, rules, regulations and relevant standards. We also realize the importance of anti-corruption. Therefore, we deem it appropriate to establish the "Anti-Corruption Policy" to put in place guidelines for preventing and combating fraud and corruption in the Company. Our objectives include: to ensure that all of our directors, executives, employees, subsidiary companies, associated companies, other companies over which we have the controlling power, business agents and stakeholders acknowledge, understand and strictly adhere to this Policy; and also to build a strong organizational culture where everyone realizes negative effects of fraud and corruption, to create good corporate values, and to increase confidence of all stakeholders in order to effectively combat fraud and corruption.

Roles and Responsibilities

1. **The Board of Directors** has the roles and responsibilities to oversee the overall anticorruption initiatives, establish and approve relevant anti-corruption policies, as well as to demonstrate the Company's stance on corruption to all IT CITY personnel, related business partners and the public.
2. **The Corporate Governance Committee** has the roles and responsibilities to oversee the Company's operations in compliance with the policies and regulations relating to corruption, establish and approve relevant anti-corruption procedures, as well as review the relevant anti-corruption policies and procedures to ensure their appropriateness.
3. **The Audit Committee** has the roles and responsibilities to oversee the internal control processes, the accounting and financial reporting process and the internal auditing process to ensure the appropriateness, efficiency, effectiveness and completeness of the internal controls, especially internal controls concerning corruption risks.
4. **President** has the roles and responsibilities to establish efficient guidelines or work processes to align with the direction from the Corporate Governance Committee as well as set the communication and training program to CPALL personnel to ensure that they have sufficient understanding and are able to efficiently and effectively apply related policies and procedures in their operations. They also are responsible for reviewing the appropriateness of related procedures to align with any changes in business operations, procedures, regulations and laws.
5. **The Internal Audit Office** has the roles and responsibilities to perform the review of the Company's internal control system as well as to review compliance with relevant anticorruption policies and procedures to ensure that the internal control system is appropriate, effective, efficient and adequate for any potential corruption risk. They also are responsible for the periodical and timely reporting of internal audit results as well as any urgent matters to the Company's senior management and relevant committees.
6. **All IT CITY Personnel** have the roles and responsibilities to understand and act in accordance with the anti-corruption policy and relevant procedures. They are responsible to report to their supervisor or a designated reporting channel if they encounter any breach of the Company's policies and procedures or have any questions about the Company's policies and procedures.

Policy

1. The company has a zero-tolerance policy to counter against all forms of corruption, whether direct or indirect, such that the Company supports and promotes anti-corruption initiatives for IT CITY personnel, at all levels, to understand the importance and be conscious in countering corruption.
2. IT CITY personnel shall not engage in any form of corrupt act, whether direct or indirect. All personnel shall not provide, offer, promise, request, or accept corrupt practices for the benefit of company, one's self or others (such as family, relatives, friends or acquaintances) whether in dealings with government officials or private organizations that may constitute corruption. They shall act in accordance with all relevant laws, especially anti-corruption related laws in Thailand and all countries in which the Company operates.
3. IT CITY personnel shall foster anti-corruption values and awareness by working honestly, ethically and transparently without engaging in corruption as part of the organizational culture.
4. The Management shall establish guidelines to align with this policy, covering the following areas:
   - 4.1 Performing a corruption risk assessment and designing internal controls taking corruption risks into consideration, especially in the sales and marketing process, procurement and contracting process, human resources process, books and records keeping process, reimbursement of some expenses that may lead to corruption risks such as charitable contributions, sponsorships,

hospitality, or gifts providing) as well as any process in relation to dealing with government entities.

4.2 Establishing a formal anti-corruption program for Management and staff to follow to help prevent corruption in operations as well as establishing a formal requirement to disclose information in relation to the Company's anti-corruption program to the public.

4.3 Establishing a communication process as well as periodically communicating the Anti-Corruption Policy and relevant procedures to IT CITY personnel and external parties.

4.4 Performing reviews of internal processes to ensure the efficiency and effectiveness of the internal control system design and implementation, as well as establishing the reporting process for internal audits performed on anti-corruption program implementation to the relevant Committee and the reporting process for urgent matters to the Senior Management and Board of Directors.

4.5 Establishing secure channels to report any corruption practices and channels to seek advice when corrupt acts are encountered.

5. IT CITY personnel shall not ignore or neglect to report any suspected instances of corruption through the channels provided by the Company. The company shall provide protection to employees who report corrupt acts.
6. The Company shall fairly treat and protect employees who refuse to participate in corrupt acts. No employee shall suffer any sanction, penalty or any other adverse consequence of whatever nature for refusing to participate in corruption, even if such refusal may result in the Company losing business.

Any actions violating this policy shall be considered for disciplinary action in accordance with the Company's rules which may include termination if deemed appropriate. Additionally, any IT CITY Personnel found to be in violation of these policies may be subject to legal action if the act is proved to be a violation of law.

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Anti-Fraud Procedures

1. Introduction

IT CITY Public Company Limited ("IT CITY" or "the Company") recognizes the importance of good corporate governance as well as commits to fight against corruption. To ensure that the Company can operate according to its commitment, the Company establishes these Anti-Corruption Procedures ("the Procedures") for employees to use as guidelines aligned with the Company's Anti-Corruption Policy in order to prevent, detect and respond to any fraudulent acts, including corruption.

1.1 Objectives

The Company has developed formal "Anti-Fraud Procedures" with the following objectives:

1.1.1 To establish activities and procedures as guidelines for CPALL personnel to prevent, detect and respond to any potential risks of fraud.

1.1.2 To delegate roles and responsibilities for each level of personnel to prevent, detect and respond to any potential risks of fraud in an appropriate manner, to declare the intent and encourage the Company's culture in working against fraud as well as to raise awareness of the Company's fraud risks.

1.1.3 Establish practical guidelines consistent with the Company's Anti-Corruption Policy to enable all personnel to prevent, detect, and respond appropriately and promptly to any suspected or actual acts of corruption.

1.2 Scope of the Guideline

This Guideline applies to the operations of the Board of Directors, sub-committees, executives, and all employees (collectively referred to as the "Company's Personnel"), as well as representatives, intermediaries, independent contractors, and consultants who act or perform duties on behalf of the Company (collectively referred to as the "Business Associates").

This Guideline forms part of the **Company's Anti-Corruption Policy**, which has been approved by the Board of Directors. It establishes measures for preventing, detecting, and responding to corruption ("Anti-Corruption Measures") and shall be implemented in conjunction with the **Corporate Governance Policy** and the **Business Code of Conduct**.

In addition, any policies, guidelines, or operational procedures approved by the Executive Committee that are related to anti-corruption matters shall be deemed an integral part of this Anti-Corruption Policy.

2. Definition

Corruption	Corruption is the misuse of position or power of influence for inappropriate gains for the organization, one's self, or others. Corruption includes bribery, Facilitation Payment, conflicts of interest, economic extortion and illegal gratuities given to government officials or private organization, unless allowed by laws, regulations, tradition, culture or market conduct.
Fraud	Fraud refers to any activities seeking unlawful benefits for oneself or others, including embezzlement, financial statement manipulation, and corruption.
Asset Misappropriation	Asset Misappropriation is any action leading to the illegitimate possession of the Company's assets causing a loss of the Company's assets, opportunities, or other benefits, for personal or others' gains (others includes family, relatives, friends or acquaintances) including cash and non-cash assets.
Fraudulent statements	Fraudulent statements is the intentional distortion of financial reports - for instance, financial statements and financial recordings – or non-financial reports, as to conceal misappropriation of assets or activities for personal and/or other's interests, resulting in misstatements in those reports and records.

Bribery	Bribery means the offering, promising, giving, accepting of anything of value either directly or indirectly as a purpose for private gain or for maintaining business or untransparent business advantage.
Public Official	Public Official means a government regional and s district official regardless of domestic or foreign.
Third Party	Third Party means a contractor, an agent, a representative, or any person who acts for or on behalf of the Company, whether they have the authority in such matter or not.
Facilitating Payments	Facilitating Payments means unofficial expenses paid to government officials. Which is a payment which exceeds the rate prescribed by law. Even if it's a small amount to persuade operators in their duties. Expedite the action or to ensure that any action according to the duty that such person is already obligated to perform. Such as applying for a permit requesting a certificate and receiving public services, etc.
Reception and Hospitality	Reception and Hospitality means the spending for business reception such as meals and beverages, sporting activities and other expenses directly relevant to business practices or due to trade customs, including provision of knowledge and understandings on a specific business.
Donations and Sponsorship”	Donations and Sponsorship means the giving or receiving of financial supports, products or services to any party requesting such donation or sponsorship whereby its objective is to provide public benefits to society and charity or promote the Company’s business and good image.
Political Contributions	Political Contributions means the giving of assets, money, items, rights or any other benefits in order to assist, support or otherwise benefit any political party, politician or person whose duties involve politics, including political activities, whether directly or indirectly.
Gifts	Gifts are anything that the Company provides or receives to/from external parties such as vendors, services providers, financial institution officers, officers of government agencies, state-owned enterprises, government-owned entities, officers of other organizations or the general public, to foster good relationships in an acceptable manner with appropriate value and timing as well as in accordance with traditions and applicable laws.

3. Commitment to countering fraudulent acts

IT CITY does not tolerate any form of fraudulent or corrupt activities even if such activities would be for the Company’s benefit. To ensure that IT CITY personnel do not ignore or neglect fraudulent and corruption acts, all IT CITY personnel must understand and strictly conform to the Company’s Anti-Corruption Policy, Corporate Governance Policy, Code of Conduct, Anti-Corruption Procedures, Working Instructions, and all other relevant policies, without exception.

Under these procedures, the Company is committed to meticulously and appropriately investigate all cases of suspected fraud, regardless of external factors (such as, position, tenure and relationships within the Company of the accused) by conducting investigations objectively and impartially. Furthermore, the Company shall enforce disciplinary actions to offenders according to the highest measures and shall consider enforcing disciplinary actions to IT CITY personnel who acknowledge such matters but fail to report fraudulent activities.

Nevertheless, the Company shall protect whistleblowers and provide fair treatment to IT CITY personnel who refuse to engage in fraudulent acts or report fraudulent activities to the Company. The Company shall not demote, penalize or provide other adverse consequences to IT CITY personnel who refuse to become involved with fraud especially corrupt activities, even if such refusal may result in the Company’s loss of business opportunities.

4. Roles and Responsibilities

IT CITY personnel must act in accordance with the Company's values and Code of Conduct as well as support Anti-Fraud related policies and procedures, including these Procedures. As such, certain functions within the Company, such as the Board of Directors, Corporate Governance Committee, Audit Committee, Chief Executive officer, Corporate Governance Sub-Committee, Internal Audit Office and the Human Resources Department, also carry additional responsibilities to counter against fraud as follows:

4.1 The Board of Directors

The Board of Directors is responsible for overseeing the overall anti-fraud initiatives. Their main responsibilities are as follows:

4.1.1 Determine and approve the anti-corruption policy.
4.1.2 Approve and review practices for the anti-corruption policy.
4.1.3 Monitor the system to support the anti-corruption proficiently and taken anti-corruption measures to practice in the organization.
4.1.4 Identifying and delegating the responsibilities to establish relevant anti-fraud measures to the Corporate Governance Committee so as to ensure compliance with relevant anti-fraud and corruption policies.
4.1.5 Complying with the policies and procedures pertaining to fraud and corruption.

4.2 Corporate Governance and Sustainability Committee

The Corporate Governance and Sustainability Committee is responsible for overseeing and supervising all the Company's policies including relevant fraud and corruption policies. Their main responsibilities are as follows:

4.2.1 Overseeing compliance with all relevant policies and procedures pertaining to anti-fraud and corruption.
4.2.2 Considering, determining, reviewing and updating the policy and procedures on anti-fraud and corruption in order to propose to the Board of Directors for consideration and approval as well as to monitor the implementation of these policies and procedures.
4.2.3 Assigning and delegating the roles and responsibilities of other procedures relevant to the anti-fraud measures, such as fraud risk management, whistle- blowing process, investigation process and fraud risk assessment, to the Corporate Governance Subcommittee and/or Management who are experienced and skilled with such matters.
4.2.4 Reporting the implementation and compliance with the policies and procedures to the Board of Directors.
4.2.5 Complying with the anti-corruption policy and procedures pertaining to anti-fraud and corruption.

4.3 The Audit Committee

The Audit Committee is responsible for evaluating the sufficiency and appropriateness of the anti-fraud procedures. Their main responsibilities are as follows:

4.3.1 Revising and approving the internal audit plan, proposed by the Internal Audit Office, to ensure it covers anti-fraud controls and measurements including key fraud risks and other relevant procedures.
4.3.2 Overseeing and ensuring the independence and appropriateness of the whistle- blowing process including the investigation process for any cases, especially when the allegations involve personnel at the management level.
4.3.3 Reporting the status of fraud case management as well as any fraud occurrences to the Board of Directors on a quarterly basis.
4.3.4 Consulting with the external auditor about occurrences of significant fraud.
4.3.5 Complying with the anti-corruption policy and procedures pertaining to anti-fraud and corruption.

4.4 President

The President is responsible for designing and implementing the fraud risk management plan, systems, procedures and internal controls for the prevention, detection and response to fraud risks. Their roles and responsibilities are as follows:

4.4.1 Promote, support and monitor to ensure that the staff and all concemed persons shall be in compliance with the policy and anti-corruption measure and relevant rules and practices as well as communicate them to the staff and all concerned persons.
4.4.2 Review the appropriateness of working systems and measures to be in conformity with the change of business, regulations and provisions of law.
4.4.3 Monitor and supervise efficient anti-corruption support system and adopt measures anti-corruption practices in the organization.
4.4.4 Complying with the anti-corruption policy and procedures pertaining to anti-fraud and corruption.

4.5 The Sustainable development Subcommittee

The roles and responsibilities of the Sustainable development Subcommittee are as follows:

4.5.1 Reporting and liaising with the Corporate Governance and Sustainability Committee as well as President regarding anti-fraud initiatives.
4.5.2 Reviewing policies, procedures and processes in relation to fraud as well as fraud risk management to ensure the efficiency and completeness of implementation.
4.5.3 Acting as coordinator to communicate the requirements of the anti-fraud program to IT CITY's personnel.
4.5.4 Following-up on compliance with the Anti-corruption Policy and relevant Procedures by the designated person and reporting the results to the Corporate Governance and Sustainability Committee on a quarterly basis.
4.5.5 Complying with the anti-corruption policy and procedures pertaining to fraud and corruption.

4.6 Internal Audit Department

The Internal Audit Department is an independent and objective function responsible for performing the audit, providing consultation on the audit, evaluate risks and internal controls related to the anti-fraud measures. The roles and responsibilities for the Internal Audit Department are as follows:

4.6.1 Reviewing the efficiency and effectiveness of the Anti-Corruption Policy including related procedures and processes as well as an adequate internal control system for fraud risk management.
4.6.2 Evaluating the design and operation of internal controls related to fraud risks and determine whether any deficiencies found constitute fraud or have occurred due to fraud.
4.6.3 Gathering all whistle-blowing information as well as supporting and cooperating with the Investigation Committee in sharing information and making recommendations in the investigation process.
4.6.4 Reporting the internal audit results as well as the status of any reported or alleged fraud or any fraud occurrences to the Audit Committee on a quarterly basis.
4.6.5 Complying with the anti-corruption policy and procedures pertaining to fraud and corruption.

4.7 The Risk Management Function

The roles and responsibilities of the Risk Management Function relating to fraud are as follows:

4.7.1 Liaising and providing advice on the anti-fraud program.
4.7.2 Providing advice to the Management regarding the fraud risk assessment as well as collating and documenting fraud risk assessment results as the Company's fraud risks.
4.7.3 Raising any issues relating to the Company's fraud's risks or new emerging fraud risks.
4.7.4 Monitoring that each function has sufficient controls on fraud prevention and fraud risk management as well as recognizing significant fraud incidents for efficient and timely management.
4.7.5 Complying with the anti-corruption policy and procedures pertaining to the anti- fraud and corruption program.

4.8 The Human Resources Department

The roles and responsibilities of the Human Resource Department relating to fraud are as follows:

4.8.1 Establish guidelines and channels to create an ethical tone for IT CITY personnel in ethics, fraud risk management and fraud awareness, as well as conduct training to increase the understanding and competency of IT CITY personnel to prevent fraud in performing their work.
4.8.2 Performing background checks on document verification of employees' credentials and competency as well as work experience for key positions prior to the signing of employment

contracts to ensure that there is no issue about personal integrity that may impact their suitability for the position.

4.8.3 Ensuring that employment contracts address relevant conditions of employment relating to fraudulent conduct.

4.8.4 Incorporating ethical principles against fraud in employee performance evaluations

4.8.5 Conducting exit interviews for all employees leaving the Company as they may recognize if possible fraud has occurred within the Company.

4.8.6 Complying with the anti-corruption policy and procedures pertaining to fraud and corruption.

4.9 Welfare Management and Purchase Deparment

The roles and responsibilities of the Welfare Management and Purchase Deparment relating to fraud are as follows:

4.9.1 Establish guidelines and channels to create an ethical tone for IT CITY personnel in ethics, fraud risk management and fraud awareness, as well as conduct training to increase the understanding and competency of IT CITY personnel to prevent fraud in performing their work.

4.9.2 Performing background checks on business partners, especially vendors, contractors and service providers to ensure the reliability, creditability, reputation and competency relating to the business's requirements

4.9.3 Complying with the anti-corruption policy and procedures pertaining to fraud and corruption.

4.10 IT CITY Personnel

All IT CITY personnel are responsible for reporting fraud or any suspicious fraudulent activities to the designated person. Employees' roles and responsibilities are as follows:

4.10.1 Understanding all policies and procedures in relation to fraud, fraud risk management, the Company's Code of Conduct, charitable contributions, sponsorships, gift giving and receiving, and hospitality expenses including other relevant expenses.

4.10.2 Communicating all policies and procedures in relation to fraud, fraud risk management, the Company's Code of Conduct, charitable contributions, sponsorships, gift giving and receiving, and hospitality including other relevant expenses to related business parties.

4.10.3 Understanding and complying with their own roles and responsibilities in relation to fraud as well as fraud risk management.

4.10.4 Reporting through the provided channels immediately if they suspect or believe that there is evidence of irregular or improper behavior or that an incident of fraud may have occurred.

4.10.5 Providing cooperation by supporting the Investigation Committee in providing information or assist in the investigation process in providing requested information or other assistance.

4.10.6 Being aware of red flags and immediately reporting fraud-related incidents to the Management in a timely basis.

Under these procedures, it is the responsibilities of IT CITY Personnel, at all levels, from general levels to the Board of Directors, to understand and comply these Anti-Fraud Procedures, as well as related policies and procedures without exception. Any violation of these policies and procedures shall be subjected to disciplinary actions.

5. Prevention Procedures

Prevention measures can assist IT CITY in minimizing the chance of fraud occurrences. Fraud risk assessment, implementation of relevant policies, internal control design and implementation to reduce fraud risks, as well as communication to raise awareness among IT CITY Personnel to create an anti-fraud culture and ethical values are critical components of prevention mechanisms for the Company. The prevention measures comprise the five main activities as follows:

5.1 Fraud Risk Assessment

The objectives of the fraud risk assessment are for all functions in IT CITY personnel to proactively perform their duties by identifying, assessing and reviewing the Company's risks of fraud, as well as to raise awareness of potential fraud risks and its impact on the Company's operations. The assessment is to ensure that fraud risks are identified and managed in an appropriate and timely manner. As such, the management of all functions must collaborate in providing any relevant information regarding fraud risks associated with their functions.

The fraud risk assessment is comprised of 3 main steps as follows:

5.1.1 Preparation to determine the risk parameters in terms of impact and likelihood of occurrences as well as to determine the risk appetite of the Company.
5.1.2 Identification of risks and current internal controls as well as assessment of the current internal controls in place to evaluate the impact and likelihood levels after implementation of the current control in place (residual risk analysis).
5.1.3 Establishment and implementation of risk response measures to mitigate the risk to an acceptable level for cases where the current internal controls in place are insufficient to prevent fraud risks.

Thus, the Risk Management Function is assigned for providing advice to the Management in performing the fraud risk assessment as well as consolidating all fraud risk results from the assessment into the Company's documentation. As such, each risk owner must report their current operation on risk management schemes including the on going status of the risk action plan to the Risk Management Function so that they can report to the Board of Directors semi-annually.

Nevertheless, the Risk Management Function shall only be responsible for providing advice and collating risk-related documents; whist the functions' management will primarily hold responsibility for identifying and assessing the risks including establishing measures for fraud risk mitigation. Additionally, the Internal Audit Office is responsible for assessing the sufficiency and efficiency of the current internal controls in place that have been identified during the risk assessment sessions. If the current internal controls in place are insufficient or inefficient, the Internal Audit Office may offer advice and propose corrective measures to the Management for implementing risk response plan/ action plan to mitigate those risks into an acceptable level.

The Company assesses and reviews corruption risks every three (3) years or whenever there are significant changes in circumstances, in order to identify any new risks or changes in existing risk levels. Such risks may vary due to several factors, including changes in work processes, the implementation of new information technology systems, changes in personnel roles and responsibilities, or the emergence of new forms or methods of corruption.

5.2 Anti-Corruption Policies and Procedures

The Company has established policies and procedures as part of the Company's anti- corruption program – for instance, the Corporate Governance Policy, Anti-Corruption Policy, Anti-Fraud Procedures, Charitable Contribution Procedures, Sponsorship Procedures, Gift and Hospitality Procedures, and other relevant Expense Procedures, and Code of Conduct – in order to foster knowledge, good recognition and practices as well as to raise awareness and create values for anti-fraud.

All relevant policies, guidelines, and operational procedures must be approved by the Board of Directors or by the person authorized by the Board. In addition, the Corporate Governance and Sustainability Committee shall review and update such policies, guidelines, and operational procedures at least once every three (3) years to ensure that corruption risks are effectively managed, as well as to reflect any amendments required to comply with applicable laws, regulations, and related requirements.

The Company must also communicate its related policies, procedures and measures to IT CITY personnel as well as to the external parties (related business partners and the public). All personnel have a duty to read, understand, and strictly follow all content of such policies and procedures.

5.3 Communication and Training

Communication and training play an essential role in fraud prevention to help foster the knowledge, understanding and awareness of the importance of complying with anti-fraud policies and procedures as well as promoting the participation of IT CITY personnel in managing the Company's fraud risks through preventing and detecting fraud and communicating to related business partners to illustrate transparency and anti-fraud initiatives at IT CITY.

Therefore, the Company has set the steps to communicate the anti-fraud policy and procedures as follows:

5.3.1 Establish a formal communication plan for anti-fraud related policies and procedures for the communication to both internal and external parties.
5.3.2 Determine appropriate communication channels for each type of audience, whether internal or external, such as newsletters, posters, letters, training, workshops, etc.
5.3.3 Determine the frequency of each communication channel.
5.3.4 Determine the communication contents to properly cover relevant policies and procedures, the Company's expectations for employees, the policy that employees will not suffer demotion or punishment for any refusal of involvement with corruption, and enforcement actions to address violations of the program.

5.3.5 Perform communication activities according to the approved annual communication plan.

The communication plan and channels should be reviewed by the Internal Audit Office to ensure the efficiency of the communications.

Furthermore, the communication of policies and procedures related to anti-fraud initiatives is the responsibility of the Communications Management and Image Office, Center of Development, and Procurement Function as well as other functions dealing with external parties. The communication plan must include training sessions on anti- fraud related policies and procedures. Such trainings shall be provided both to new staff as part of orientation induction training and to current personnel as part of annual refresher training.

The training content should include at least the following topics: the definition of bribery; the Company's anti-bribery policy; the potential impacts of bribery on the Company including legal consequences, loss of business opportunities, and reputational damage; legal penalties; practical guidelines and cautions regarding the giving of gifts and entertainment; guidelines and cautions on charitable contributions and sponsorships; guidelines and cautions on the engagement of third parties and agents; methods for refusing bribery; and disciplinary measures.

The purpose of such training is to ensure that all Company personnel clearly understand and develop awareness, conscience, and values in preventing and opposing all forms of corruption.

Furthermore, the communication of anti-corruption policies, principles, requirements, guidelines, and operating procedures to subsidiaries, joint ventures, other controlled entities, business representatives, and all external parties having business dealings with the Company shall be the responsibility of the departments directly interacting with such external parties.

5.4 Due Diligence

An important part of an effective fraud prevention strategy is the use of due diligence in the hiring, retention and promotion of employees and in selecting related business partners. As such, the Company delegates the Human Resources Division to perform due diligence for employees prior to hiring or promoting and delegates the Procurement Function to perform due diligence of related business parties prior to the commencement of work.

The Company may perform appropriate screenings, with the consent of individuals and under the relevant laws and regulations, in the following areas:

5.4.1 **Pre-employment screening** - to verify the qualifications, suitability and experience of a potential candidate including historical tracking of fraud.

5.4.2 **Employment of Government Officials or Former Government Officials (Revolving Door)** The Board of Directors recognizes the importance of upholding high standards of corporate governance, integrity, and transparency in the Company's business operations. Accordingly, the Board places great importance on establishing a policy on the employment of government officials or former government officials to prevent potential conflicts of interest and to strengthen stakeholders' confidence that the Company operates fairly, transparently, and in accordance with business ethics. The Board shall regularly review this policy to ensure its continued relevance, appropriateness, and alignment with the Company's corruption risk management practices.

5.4.3 **Key position screening** - to verify the qualifications, experience, financial health, references provided, or conflicts of interest that may occur when taking new position.

5.4.4 **Business Partner Screening: Potential vendors, contractors and service providers** - to verify the reliability, qualification, financial health, reputation and product qualification or integrity of business partners including historical tracking of fraud.

Furthermore, it is essential for all Board members, the Management, and employees in key positions, as announced to the Office of the Securities and Exchange Commission, to disclose any conflicts of interest to the Company Secretary within the required timeframe on an annual basis, as well as to promptly update any relevant changes to the status of their interests.

5.5 Internal Controls

Internal controls are designed and implemented by the Board of Directors, the Management, and all levels of employees to ensure that the Company's objectives are achieved. Internal controls serve as an initial tool to prevent fraud in all areas of operations. The Management of each function shall properly design, implement and monitor internal controls in the process under their responsibilities to mitigate and reduce the identified fraud risks, as well as ensure that the employees under their command fully understand and comply with the designed controls.

The controls designed for each process must be included in the written procedures for the Management to review and approve prior to implementation. Such procedures shall specify the segregation of duties in performing the controls to ensure transparency and independence as well as to prevent or detect corruption risks. The procedures shall be documented and be easily accessible to all relevant personnel and communicated to all relevant personnel.

Furthermore, the Management of each Function shall review the procedures and processes regularly, or when there are significant changes impacting the operations, to ensure that such procedures align with the current practices and better internal control practices.

Additionally, the Board of Directors assigns the Internal Audit Office to be responsible for independently assessing the sufficiency, the appropriateness, the efficiency and the effectiveness of the controls designed, as well as providing recommendations for improvements to prevent or detect potential risks, especially fraud risks. The Internal Audit Office must communicate the results of the audit to the auditees for them to understand, develop and implement a realistic action plan to improve their internal control system. The Internal Audit Office must also report the results to the Audit Committee on a quarterly basis; whilst the Management of each function must be responsible to implement the recommended actions proposed by the Internal Audit Office.

Once the anti-fraud program has been implemented, the Internal Audit Office is responsible for evaluating the design and the effectiveness of the program and for reporting the internal audit results to the Audit Committee.

6. Detection Procedures

Although prevention measures can reduce the occurrence of fraud, sufficient detection measure must also be designed and implemented in order to detect and report potential fraud cases in a timely manner. Fraud hotline and fraud reporting mechanisms are critical components to detect fraud. Furthermore, to assure the appropriateness, the efficiency and the effectiveness of the detection measures, the Internal Audit Office must evaluate the design and the implementation of its relating controls annually. There are two key activities for fraud detection as follows:

6.1 Hotline and Whistle-Blowing Mechanism

The Management shall design and implement reliable and independent communication channels allowing both internal and external parties to report anonymous tips, complaints or suspicions of fraud. Furthermore, the Company shall establish the method for protecting the whistleblower to assure that he/she will not be threatened or harmed by reporting their suspicions. In return, this will help the whistleblower to feel more confident and secure in reporting such activities.

Therefore, it is the responsibility of all IT CITY personnel to report their concerns or suspicions of fraud via the established channels. IT CITY personnel who has adequate knowledge of possible fraud taking place is obligated to report such information as they may also be subject to appropriate disciplinary action if they fail to report. Whistleblowers shall be assured that as long as they raise concerns in good faith, they shall be protected. However, a whistleblower who is proven to have intentionally made a false accusation by providing false information will be subject to appropriate disciplinary action.

In order to remain anonymous, whistleblowers must provide adequate information for investigation process as follows:

- Notify the name of the suspect (if known.)
- Notify date, time, and crime scene.
- Whistleblowing the circumstances that are found or have reasonable grounds to believe that there is a misconduct which in within the scope of considered behaviors.

Currently, the Company has main reporting channels for both internal and external parties as follows:

(1) Letter to the Company Secretary

IT City Public Company Limited, The Palladium World Shopping Mall 555 Fl. B2 Ratchaprarop Rd., Makkasan Subdistrict, Ratchathe District, Bongkok 10400 By addressing the envelope, seal, or specifying the message represent “Confidential Documents” or E-mail: companysec@itcity.co.th

(2) Letter to the Internal Audit Department

IT City Public Company Limited, The Palladium World Shopping Mall 555 Fl. B2 Ratchaprarop Rd., Makkasan Subdistrict, Ratchathe District, Bongkok 10400 By addressing the envelope, seal, or specifying the message represent "Confidential Documents" or E-mail: chirawan_p@itcity.co.th

(3) Company website

www.itcity.co.th

All conditions and procedures for consideration of reporting of suspected fraud are detailed in the Information Reporting Announcement, which can be accessed by both internal and external parties in any areas. Nevertheless, those procedures should be periodically reviewed and updated by the Human Resources Department and communicated to IT CITY personnel and relevant business partners.

If IT CITY decides to implement additional whistle-blowing channel(s) in the future, the Internal Audit Office shall establish procedures for whistleblowers and responsible persons to use such additional channel(s), as well as review and update the procedures to reflect the current practices and conduct annual training (including procedures, confidentiality, ethical conduct and related policies).

7. Fraud Response Procedures

The fraud response measures are designed to take corrective action and remedy the harm caused by fraud in a timely manner to prevent the same types of fraud from re- occurring. Fraud response measures consist of the investigation, the enforcement and remediation, and the disclosure protocols are as follows:

7.1 Investigation

Collecting facts / processing and screening data

The recipients proceed to collect facts, verify the credibility of the information and evidence, and submit whistleblowing that have been approved to the investigators.

Investigation process

In the case that the complaint contains facts, investigation shall be conducted to gather evidence and witnesses. Then such complaint shall be submitted to the Complaint Committee (consisting of Internal Audit Office, Legal Office, Human Resource Department and/or any other persons assigned to oversee this matter (if any)) within 15 business days from the date on which the complaint or clue is received.

Reporting

(1) The Complaint Committee shall review facts and evidence and then prepare a report and opinion within 30 business days, which shall be proposed to the Audit Committee for further consideration and reporting to the Board of Directors.

(2) The Internal Audit Office shall prepare a report summarizing statistical data on complaints and clues relating to fraud and corruption and such report shall be kept for not less than 10 years.

If the committee violates or defies this policy, the company will appoint the commission of inquiry in order to promptly investigate the face about that act. That commission will consist of all company's independent directors.

if there's an independent director who violates or defies this policy in any investigation, that director must not be part of the commission.

7.2 Enforcement and Remediation

A firm and decisive disciplinary action will demonstrate that IT CITY is an organization that does not tolerate fraud in any circumstances; whilst, the action to remedy the impact from fraud incidents shall be promptly performed to demonstrate the commitment to solve fraud related issues.

Enforcement

7.2.1 If the executives or the offices of the company violate or omit this policy, disciplinary penalty will be executed based on the facts and environment. If the violation or omission is illegal, the penalty must be executed.

7.2.2 it can be proved that the director is the violator or doesn't abide by the policy, the commission of inquiry must appropriately consider the penalty from the evidence, fact, and environment in each case, and report the results, as well as consider the penalty (except the commission that violates or defies anti-corruption policy). However, if the violation or the omission is illegal, the penalty must be executed.

Remediation

After the completion of the investigation, the Investigation Committee and Management shall determine the remedial actions for the cases occurred – for instance, the amendment of the Company's policies, the amendment of the internal controls, the amendment of the operating procedures, the prosecution for both civil and criminal cases and the extension of the investigation into other aspects of fraud. Such remedial actions will be taken by responsible parties on a case-by-case basis according to each action plan. The action plan must include the proposed plan and timeframe and must be submitted to the Vice President for approval.

7.3 Public Disclosure

The public disclosure of internal fraud to the relevant external parties, such as the Securities and Exchange Commission of Thailand (SEC), shall be made only by the Chairman of the Board of Directors or a delegate on the behalf of the Chairman of the Board of Directors, depending on the discretion of the Chairman of the Board of Directors

The Company prohibits unauthorized personnel from disclosing information concerning fraud to others within the Company, the media, or to other entities. Any violators shall be subject to disciplinary actions.

8. Reference and Authority

The principles and obligations set out in this document may refer to other pre-existing documents of the Company. In the case of a reference to another document, the Company shall follow the principles and procedures of the referenced documents to ensure alignment. IT CITY Personnel may contact the Secretary to the Corporate Governance and Sustainable Development Committee for any questions on these procedures.

9. Procedures Review and Update

This Anti-Corruption Guideline is under the supervision of the Board of Directors. The Guideline shall be reviewed and updated every three (3) years, or whenever there are significant changes that may affect the management of corruption risks. This is to ensure that the Guideline remains consistent with the Company's policies and complies with applicable laws, regulations, and related requirements.

Any revision or amendment to this Anti-Corruption Guideline must be reviewed and approved by the Board of Directors. The updated Guideline shall be communicated and disseminated throughout the Company to ensure awareness and compliance by all personnel.

This Policy was reviewed and approved by the Board of Directors at the Board of Directors' Meeting No. 5/2025 held on 7 November 2025.

IT CITY

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