

Policy and Guideline on the Employment of Government Officials (Revolving Door) of IT City Public Company Limited

Employment of Government Officials (Revolving Door)

Principle

The employment of government officials or public officers in a manner that constitutes a *Revolving Door* situation, or is inconsistent with the principles of good corporate governance, refers to the case where a person who is or has been a government official, politician, or advisor to a government agency is employed by the Company and uses such relationship or insider information to benefit the Company, resulting in a conflict of interest between the duties of the government agency or regulatory body and the Company under its supervision. Such conduct aims to gain unfair business advantage or to influence policy decisions in favor of the Company for which the former government official is employed, thereby posing a risk of corruption and personal conflict of interest involving individuals with roles in both organizations.

Scope

This Policy on the Employment of Government Officials (Revolving Door) shall apply to the recruitment and employment of executives, employees, and staff members of IT City Public Company Limited and its subsidiaries under the Labour Protection Act and related labour laws. The purpose is to ensure transparent management practices and to establish clear operational guidelines to prevent the risk of corruption and misconduct.

Definition

“Government Officials” refer to persons who are or have been political office holders, civil servants, or local government officers with official positions or permanent salaries; employees or persons working in state enterprises or government agencies; local administrators and members of local councils who are not political office holders; and officials under the law governing local administration. The term also includes directors, subcommittees, employees of government agencies, state enterprises, or other state entities, as well as persons or groups of persons who exercise or are authorized to exercise administrative power on behalf of the State in accordance with the law, whether such entities are established within the bureaucratic system, state enterprises, or other state-affiliated undertakings. (*Reference: Organic Act on Counter Corruption B.E. 2542 (1999)*)

“Employment of Government Officials” means the engagement of government officials to work in the private sector in any capacity, receiving compensation or any other form of benefits, whether directly or indirectly. Such employment may be on a permanent basis or under a special fixed-term contract. This practice may pose a risk of corruption, conflict of interest, or other forms of misconduct.

Company Practice Guidelines

- 1) The Company shall not consider employing or appointing any current government officials or public officers, except in cases involving state enterprises, government agencies, or public authorities that are expressly permitted by their establishing laws or relevant regulations to assign representatives to work

with private organizations, provided that such arrangements comply with lawful processes and purposes.

- 2) To prevent conflicts of interest between personal and public interests, the employment of former government officials who previously exercised regulatory, supervisory, or audit authority over the Company — or who served in a government agency directly responsible for overseeing the Company — shall be subject to a *Cooling-Off Period* of two (2) years, in accordance with Section 127 of the Organic Act on Counter Corruption B.E. 2561 (2018).
- 3) The selection, approval, and remuneration determination for the employment of government officials or public officers in executive positions such as Chief Executive Officer or Deputy Chief Executive Officer shall be carefully reviewed and must be approved by the Board of Directors.
- 4) The selection, approval of employment, and determination of remuneration for hiring government officials to serve from the General Manager level downward or as consultants must be carefully justified and shall require approval by the Deputy Managing Director – Human Resources and the Managing Director.
- 5) The Company shall conduct background checks on individuals nominated for appointment as Chief Executive Officer, advisor, or other senior management positions to ensure that there are no potential conflicts of interest prior to their appointment.
- 6) The Company strictly prohibits the employment of government officials or public officers if such employment is intended to provide improper advantage to the Company, involves reciprocal benefits, or may result in misuse of authority or conflict of interest — including, but not limited to, disclosure of confidential information of the government agency previously served, lobbying to obtain undue benefits, or being assigned to liaise with their former government agency.
- 7) The Company shall disclose the employment of government officials or public officers, together with the rationale for their appointment, in the Company's Annual Report (Form 56-1 One Report) to ensure transparency.

Deployment of Company Personnel to Participate in Government Policy Work

Principle

The Company recognizes that the participation of experienced private-sector personnel in government policy work can be beneficial, as it brings new perspectives and modern business insights that can enhance policy decisions and contribute to the country's economic development. However, if not properly managed, such involvement may give rise to corruption risks or conflicts of interest. Therefore, in accordance with good corporate governance principles and to ensure transparency, the Company has established the following guidelines.

Company Practice Guidelines

- 1) The Company shall disclose information regarding any of its personnel who are assigned to participate in government policy-related work, together with the reasons for their appointment or engagement in such roles. This information shall be published in the Company's Annual Report (Form 56-1 One Report) to ensure transparency.
- 2) The assignment of Company personnel to government policy work must not give rise to conflicts of interest, reciprocal benefits, or any form of misconduct. It must also not involve or result in the misuse of official authority, nor create any conflict of interest — including, but not limited to, the disclosure of

confidential government information, lobbying, or exerting improper influence to obtain undue advantage.

- 3) In the event that a Company employee's participation in a government agency results in a clear conflict of interest, the individual concerned shall consider resigning either from the position held within the Company or from the government role to maintain transparency. The Company shall also apply preventive measures against conflicts of interest between personal and public interests in accordance with Sections 126–128 of the Organic Act on Counter Corruption B.E. 2561 (2018).

Penalty

Any act that violates or fails to comply with this Policy shall be deemed a breach of the Company's code of conduct, disciplinary regulations, and rules of employment, and shall be subject to disciplinary action or penalties as prescribed by the Company.

Policy Review

This Policy shall be reviewed and updated annually with the approval of the Corporate Governance and Sustainability Committee. In the event of any material amendment, the revised Policy shall be submitted to the Board of Directors for consideration and approval.

This Policy shall not have a retroactive effect on the employment of government officials or former government officials that was made prior to the initial effective date of this Policy. Such employment shall remain valid under the original terms and conditions until any changes are made in accordance with this Policy.

Effective Date

This Policy shall take effect from 8 November 2025 onwards. Announced on 8 November 2025.

–Mr. Vichit Yanamorn–

(Mr. Vichit Yanamorn)

Chairman of the Board

IT CITY Public Company Limited