

## Anti-corruption Policy

Bangkok Lab & Cosmetic Public Company Limited (“the Company”) has attached significance to preventing corruption to protect the rights and foster confidence among investors and shareholders in its business undertakings with transparency. The Company has given utmost priority to combating any form of fraud and corruption to communicate to all stakeholders and provide practice guidelines for the Company’s directors, executives, employees as well as subsidiaries, workers, representatives, affiliates, or any person acting for or on behalf of the Company (related person), regardless of having the power or authority to take such action, enabling them to perform their duties with adherence to integrity, transparency, and awareness about corruption. To that effect, the Company has established its anti-corruption policy in compliance with the Company’s practice guidelines together with relevant laws and regulations. It is disclosed to the public on the Company’s website.

The Company has prescribed corruption risk assessment of the processes prone to corruption and auditing of the anti-corruption policy as part of the internal audit. The Audit Committee is tasked with the detailed review of the completeness and adequacy of the process and corruption risk assessment to ensure the adequacy and effectiveness of the anti-corruption measures and report on the results to the Board of Directors. In addition, the Company stipulates regular review of the practice guidelines and operational requirements to reflect changing business, rules, regulations, and relevant laws.

### **1 Definition under Anti-corruption Policy**

“Corruption” means misuse of power or the acquired asset to gain benefits for one’s own company or for related persons or which causes damage to the benefits of other parties. Varied forms of corruption include bribery, accepting or offering valuable items, money, or benefits, a conflict of interest, fraud, money laundering, embezzlement, concealment of material facts or obstruction of justice, and trade coercion. Corruption is not limited to the relationship between a private organization and a government agency, but also includes a transaction between persons of private organizations.

“Bribery” means an act of offering, promising or granting, as well as soliciting or receiving benefit related to a valuable item, directly or indirectly, with intent to induce any illegal or unethical act to acquire a business or protect any other benefits which are undue under the code of business ethics.

“Any other items or benefits” means money, assets or any other benefits given to each other as a gesture of hospitality, rewards or incentives, provision of special privileges, as well as defraying expenses for traveling or touring, accommodation, meals, or any other things of similar nature, and whether it would be given in the form of card, ticket or any other evidence.

"Hospitality fee" means expenses related to activities incurred primarily to foster good relationship or, on some occasions, to express social etiquette. It may include accommodation allowance, traveling allowance for site visiting or sightseeing, meal and beverage allowance.

“Entertainment expense” means expenses for meals, beverages, and other related entertainment.

“Gift” means money, merchandise, service, voucher, etc.

“Political activity support” means giving support in terms of money or in kind to any specific political party, politician, or political candidate. In-kind contribution includes goods or services offered free, undertaking or engaging in a political campaign, or dedicating an employee's working time.

## **2 General Provision**

### **Practice Guidelines on Anti-corruption Policy**

2.1 The Company's directors, executives, and employees shall comply with the defined practice guidelines as follows:

2.1.1 Strictly comply with the guidelines prescribed in this Anti-corruption Policy, the Code of Conduct as well as rules, regulations, and the Company’s Articles of Association without any involvement in fraud and corruption of all kinds, whether directly or indirectly.

2.1.2 Never act in a way that suggests an intention of fraud or corruption, offering or accepting a bribe to or from any person related to the Company through any matter under

his/her responsibility, whether directly or indirectly, to obtain benefits for the organization, themselves, or related persons.

2.1.3 Do not neglect or ignore any act of suspicious corruption and bribery involved with any person related to the Company. It is considered a duty to report to the responsible persons and cooperate in the investigation of facts.

2.1.4 Maintain and use the Company's assets responsibly to ensure maximum benefits for its business. No employee shall use the assets for personal gains or benefits of related persons.

2.2 The Company shall provide protection to any person refusing to be involved in corruption or reporting on a perceived act of corruption to the Company.

2.3 Any person who commits an act of corruption which is deemed a breach of the code of business ethics shall be subject to disciplinary action according to the Company's prescribed rules and regulations and may be liable to legal punishment.

2.4 The Company has set forth appropriate and effective inspecting procedures and internal control system for finance, accounting, data recording among others and implemented risk management system to prevent any fraud or corruption.

2.5 The Company has established human resources management procedures that reflect its commitment to the anti-corruption policy and stresses the importance of communicating and educating all persons in the Company to comply with the Anti-corruption Policy.

### **3 Practice Guidelines on Purchase/Procurement**

3.1 Any unit with purchase/procurement shall comply with requirements or procedures specified in the regulations on purchase/procurement in the Work Manual, and the purchase/procurement shall be in compliance with the power to do so, with fair treatment toward related persons; and in decision-making, justification in terms of prices, qualities and services as provided must be taken into consideration, as well as taking into account various standards which goods sellers or service providers should have, such as environmental standards, industrial standards, etc.

3.2 No unit with purchase/procurement shall engage in any business which may constitute their own benefits by unduly exploiting their positions or duties in purchase/procurement, whether directly or indirectly, and no information of which he/she becomes aware from purchase/procurement shall be exploited to gain benefit for oneself or for other persons.

3.3 No directors, executives, and employees shall give any bribe in exchange for benefit in a bid or bid rigging, to any state or private agency in order to gain some advantages and benefits in the procurement process or fulfillment of a contract, before, during the bid and after execution of a procurement contract, or to protect any other benefits which are undue under the code of business ethics. They also shall not engage in any act of corruption in any form to gain advantages or benefits of similar nature.

#### **4 Practice Guidelines toward Government Agencies**

4.1 Directors, executives, and employees shall strictly comply with applicable laws and regulations.

4.2 Directors, executives, and employees shall undertake transactions with state agencies and contact with officials properly, straightforwardly, and by not committing any act which may induce any official to do or omit to do any act.

4.3 Making acquaintance or building good relationship between each other may be made on traditional occasions, festivals or traditional customs where it is within an appropriate scope to do so.

4.4 Support of activities held by government agencies, and donations may be made only when an accurate and transparent request for approval is made, and it is within a reasonable amount of money. No directors, executives, and employees shall offer or receive entertainment with a monetary value exceeding 2,000 baht per person per occasion nor gifts or other benefits with a monetary value exceeding 3,000 baht as per the announcement of the National Anti-Corruption Commission.

## **5 Practice Guidelines on Receiving of Gifts, Assets, or Any Other Benefits to Customers, Suppliers, and Other Stakeholders**

5.1 No directors, executives, and employees shall receive or give any hospitality, gift/souvenir and other benefits from and to any persons related to the business including customers, creditors, suppliers, business partners, strategic alliances, and other stakeholders. However, such receiving or providing the same in a manner which is made according to traditional customs, traditions, cultures or social etiquette, is deemed acceptable, but such act must be justifiable, proper, in line with the policy, regulations and traditional customs on each occasion, provided that evidence of expenditure, record of expenditure as actually paid and receipts or certifying evidence must be kept for subsequent inspection.

5.2 Do not solicit or give money, assets, any other items or benefits from and to any persons related to the business which may lead to influence in making a decision in an unfair manner or with an intent to induce them to do or omit to do any wrongful act or in exchange for undue special privileges.

## **6 Practice Guidelines on Hospitality**

6.1 No hospitality on each occasion which is of excessive value as stipulated by laws shall be provided to any state agencies or state officers, and no such expense shall be paid to induce the state officers to commit an offence against his/her duty or make a decision for the benefit of the Company's business, provided that actual expenses shall be recorded, and receipts or certifying evidence are also required.

6.2 Hospitality fee by business etiquette should be reasonable and actual, subject to report to and/or request for approval in accordance with the Table of Authority.

6.3 Reimbursement of hospitality fee shall not include expenses of family members of staff.

## **7 Practice Guidelines on Charitable Donations and Financial Sponsorship**

7.1 The Company supports charitable donations and financial sponsorship for the development of communities and society to improve the quality of life, build an economy, and

strengthen the communities and society. The charitable donations and financial sponsorship to charitable organizations or other agencies are subject to process of consideration and approval of the Board of Directors or authorized person(s) of the Company, provided that a memorandum of request specifying the name of the donated person/sponsored person and objective of the donation/sponsorship, with which all supporting documents must be also enclosed, shall be prepared for submission to the Company's authorized person(s) for consideration and approval according to the levels of approval authority of the Company. In such case, there are procedures of inspection, monitoring, including evidence or reply letters from the financially donated or sponsored agencies, to ensure that utilization of the money meets the specified objective.

7.2 Sponsorship is a method of public relations for the Company's business which differs from charitable donations. Such sponsorship may be made in many forms, for example, provision of support for cultural, art, educational activities, etc. It is imperative that directors, executives, employees, subsidiaries, and related persons take due care to ensure no charitable donations and financial sponsorship shall be used as a subterfuge for bribery, or to offer benefits or compensation to any person. Nor shall they be used to induce a state officer to commit an offense against his/her duty or omit to do any act as stipulated by laws or in consistency with the code of business ethics. Moreover, they shall not be a quid pro quo in return for the recipients of the donations to order the Company's products or services, promise, or offer business return or personal benefits to the directors, executives, or employees. Charitable donations and sponsorship shall be transparent and comply with applicable laws.

## **8 Practice Guidelines on Political Contribution**

8.1 The Company shall not engage in any practice in assisting, supporting or representing any political party in various public activities, whether in a financial form or others. Furthermore, there shall be no act that can be construed as the Company having become involved with or aligned with the politics or any political party or any person who have political authority, whether directly or indirectly.

8.2 In the event that the Company intends to make a political contribution for the promotion of the democratic system of government, such political contribution shall not be contrary to applicable laws nor made in the expectation of preferential treatment in return. To do so, a memorandum of request specifying name of the contributed person and objective of the contribution, with which all supporting documents shall be also enclosed, is required for submission to the Executive Board for consideration and approval.

8.3 Directors, executives, and employees shall lawfully have political rights and liberties. However, none shall commit any act which causes the Company to lose its impartiality or sustain damage from political involvement.

8.4 Directors, executives, and employees shall neither engage in any political activity within the Company nor use any of the Company's resources for such activity.

## **9 Practice Guidelines on Training and Communication**

The Company shall communicate this policy to directors, executives, and employees to ensure they are fully aware of and understand the Company's Anti-corruption Policy. Such policy is disclosed in the Company's website and in the 56-1 One-report.

## **10 Whistleblowing/Complaint Channels and Whistleblower/Complainant Protection Measures**

The Company has provided channels for reporting any breach or perceived act of friend or corruption as follows:

- Email to Chairman of the Audit Committee at [fraud-complaint@bangkoklab.co.th](mailto:fraud-complaint@bangkoklab.co.th)
- Post to Chairman of the Audit Committee at 48/1 Moo 1/ Nong Chae Sao Rd., Nam Phu, Mueng Ratchaburi, Ratchaburi 70000. Mark the envelop "Personal and Confidential".

The Company has set forth whistleblowing investigation process together with measures to protect and mitigate damage caused to whistleblowers or complainants in accordance with the prescribed Whistleblowing / Complaint Policy.

## 11 Punitive Measures

Any persons who commit violation or misconduct under the aforementioned policy and practice guidelines shall be subject to disciplinary action in accordance with the work rules and regulations specified by the Company and shall also be liable for compensation for damage to the Company or persons who have been affected by such act. In addition, legal punishment may be imposed if such act is illegal.

## Related Polices

- Code of Conduct
- Whistleblowing and Complaint Policy

## Review of the Policy

The Anti-corruption Policy is reviewed and assessed for completeness and adequacy every year.

This Anti-corruption Policy was approved by the Board of Directors' Meeting No. 6/2565 on October 19, 2022 and took effect from November 10, 2022 onwards. Continuous enforcement of the Policy is endorsed upon the conversion of the Company into a public limited company.