

# Conflicts of Interest Policy

## Group

### Framework

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## 1. Objective

Siam City Cement Public Company Limited (“the Company” or “SCCC”) and its subsidiaries (“Group Companies”), whether directly and indirectly held (collectively referred to as “the Group”) promote integrity and transparency in conducting its business, as these are fundamental in meeting its stakeholders’ expectation and building trusts with customers, business partners, and the public.

This Policy is established to provide the standard of conduct to ensure that all Personnel act in the best interest of the Company and the Group.

## 2. Scope

This Policy applies to all Employees, Management, Directors as well as any person who represents or performs work on behalf of any entity within the Group (hereinafter “Personnel”).

All Personnel are obligated to act at all times solely in the best interests of the Company and the Group.

### 3. Definitions

Conflicts of Interest	is the situation where the financial or other interests of the Personnel interfere or may be perceived as interfering with the ability to act in the best interest of the Company or the Group.
Advantage	Any economic or non-economic advantage of any kind that is directly or indirectly offered or provided to third parties, or offered by or received from third parties, in connection with actual or potential business activities or decisions of the Group. Non-economic benefits include, but are not limited to, gifts, meals, entertainment, travel, lodging, grants, donations, undue discounts, etc.
Gifts	Something that is given or received to/from another person including but not limited to cash, vouchers, or any item (e.g., pens, hampers, concert tickets) having any cost or financial value, including food or beverages (e.g., supplier or sub-contractor sponsored meals, entertainments, and hospitality) as well as any items of value.
Donation	Spending or receiving donations for the purpose of contributing to society. The organization which received funds must be reliable and must provide a donation certificate. The donation must be transparent and pass the company's approval process. The requester must ensure that funds are not used for other purposes.
Sponsorship	Form of giving or receiving money, objects, or property to an activity or a project must specify the name of SCCC or its Group Companies. The sponsorship must have the purpose of promoting the company and the Group's good reputation and must be transparent and obtain approval according to the company's process.
Entertainment and Hospitality	refers to the spending on business courtesies with externals such as spending on food, beverages, and recreation (e.g., tickets, and/or passes to events, services, training, seminars, and transportation).
Business Courtesies	refers to cash or cash equivalent, gifts, entertainment hospitality, favors, and other benefits given to or received from those with whom an organization does business.
Close relationships	The family members with close relationships to the Personnel either related by blood, including parents, grandparents, children, siblings, or relationship from registration under laws, including spouse, stepchildren, foster parents, or individuals whom you have close relationships with, including partner (not married but in a relationship), mothers-, fathers-, brothers-, and sisters-in-law, someone who is financially dependent on you or you are financially dependent on them, any juristic person having its family member as a major shareholder or a controlling person through the shareholding not less than 30 percent of equity interest.
Employees	All employees in the Group include temporary workers, contract workers, and any other person who require completed work for and on behalf of the Group.

#### 4. Responsibilities

**Directors, Management, and Employees of the Group** shall disclose or report any conflicts of interest that occurred or become to his/her knowledge at any time for transparency and integrity of the individual.

It is also the responsibility of the individual to avoid or prevent any situation or action that may create or appear to create or lead to a situation that could be perceived as a conflict of interest.

**Audit Committee** shall give recommendations on a solution to the conflicts of interest in relation to the Charter of the Audit Committee.

**Head of Group Internal Audit and Compliance** shall be responsible for undertaking regular reviews, in order to ensure that the implementation and application of the policy remain robust at all times, as well as receiving reports from the person in charge of compliance matters in each Group Company in order to report the result and the opinion to the Group CEO and the Audit Committee respectively.

**Company Secretary of each Group Company** shall be responsible for obtaining the declaration of the conflicts of interest from the Board members and report to the Audit Committee and the Chairman of the Board of Directors via the Head of Group Internal Audit and Compliance.

**Group Company CEO (GC-CEO)** shall be responsible for the overall management of the conflicts of interest program within his/her company in order to ensure the appropriate declaration of conflict of interest is reported and the conflict resolution is identified and implemented properly and timely. The CEO shall also be accountable to assure that full awareness on the topic of Conflicts of Interest is established across the Company, as well as to establish a clear "Tone from the Top" on compliance.

**Senior Management and above** shall manage conflict of interest in their respective functions based on the best interest of the Company and the Group and in cases where the subordinates have a conflict of interest, the conflict must be immediately resolved and reported to the person in charge of compliance matters in each Group Company.

**Human Resources Function of each Group Company** shall be responsible for ensuring that the new joiner has disclosed the actual or potential conflict of interest (see Annex 4) prior to the commencement of employment. They are also responsible for distributing the Annual Conflict of Interest Declaration to all employees, then reporting the result of the annual declaration and raising a potential conflict of interest to the CEO and the person in charge of compliance matters in each Group Company.

Human Resources function also has the responsibility to maintain the employees' disclosure of data and documentation.

**Supervisor** shall be responsible for reporting to the person in charge of compliance matters when his/her subordinate report/disclose his/her actual or potential conflict.

**Compliance Function of each Group Company (or the person in charge where there is no Compliance Function)** shall be vigilant in promoting the conflicts of interest compliance policy and investigating potential violations of such policy including support the timely identification and analysis of the potential conflicts of interest. The Head of Compliance Function or the appointed person ("the person in charge of compliance matter") in each Group

Company will report any noticeable issue on conflicts of interest and the result of the annual conflicts of interest declaration to the Head of Group Internal Audit and Compliance.

In addition, the Compliance function and the person in charge of compliance matters must review and analyze the receiving reported items from externals to see the trends that are likely to cause issues or concerns and determine the solutions and preventions.

## **5. Policy Directives**

A conflict of interest arises when the Personnel has a personal relationship or financial or other interest that could interfere with his/her obligation, or when they use their position with the Company for personal gain. The Company requires the Personnel to disclose all potential conflicts of interest and that they promptly take actions to eliminate the conflict.

### **5.1 Guiding Principles**

- a) As general rules, Personnel must not use their position for personal, financial, or other benefits (means direct or indirect benefits such as honors or positions), apart from being remunerated by the Company or the Group for their activity, nor may they use such position for the financial or other benefits of family members or other related persons. No Personnel may take part in any business activities where they may be influenced by any said interests that are perceived or may be perceived, as a hindrance to objective decision-making in the Company's or the Group's interest.
- b) Employees must not engage in activities outside of work that create a possible conflict with the Company's best interest.
- c) Personnel must avoid situations that may cause conflict of interest. However, when a conflict of interest occurs, Personnel should take steps to ensure that the situation is treated fairly to the opposite party e.g., customers, suppliers, etc., and the Company by disclosing information (see Annex 5) or refusing to take any other action or as appropriate.
- d) Employees must be cautious when giving gifts or entertainment to anyone whom the Company does business with and also respect and adhere to customer or supplier policies that may not permit the acceptance of gifts or entertainment. Employees must only participate in business entertainment when it is an integral part of business-building activities.
- e) Receiving gifts, entertainment, or other gratuities from people with whom we do business is generally not acceptable because doing so could imply an obligation on the part of the Company and potentially pose a conflict of interest.
- f) In the event that employees have direct or indirect interests that are in conflict or may conflict with the interests of the Company or the Group, employees must notify supervisors and the Compliance function or the person in charge. Such employees should not be involved in decisions related to that benefit to ensure that the Company makes fair decisions.
- g) If an employee is unsure about whether a contemplated activity might constitute a potential conflict of interest, the employee should talk to his/her direct supervisor or contact the Compliance function or the person in charge of guidance.

## 5.2 Guidelines on Offering and/or Receiving

The offering and/or receiving of business courtesies should meet the following guidelines:

- a) **Cost, amount, and frequency:** Business courtesies and charitable donations should be reasonable, of modest value, and occasional (see Clause 5.9).
- b) **Appropriateness:** Business courtesy and charitable donations are appropriate if they are for legitimate business purposes, customary and it does not damage the Company, and the Group or its employees' reputation should be disclosed publicly. The Group does not have a policy to support a political party or group directly or indirectly and prohibits anyone from approving a transaction that supports a political party or group.
- c) **Conflict of Interest:** Business courtesy and charitable donations must not influence or appear to influence business decision-making and create a potential conflict of interest.

## 5.3 Disclosure and Reporting

- a) All new hired employees shall be requested to disclose all actual or potential conflicts of interest at or before the commencement of employment in the Conflicts of Interest Declaration for New Hire (see Annex 4).
- b) Employees in the Middle Management Level (MML) to Top Management Level (TML) of each Group Company shall annually disclose and promptly update any disclosures in the Annual Conflicts of Interest Declaration (see Annex 5).
- c) All employees are obliged to disclose information about the actual conflict and potential conflict when there are changes to the latest disclosure at the channel provided in each Group Company in order to avoid situations that may cause consequences from not disclosing information about conflict of interest between themselves and the Company.
- d) Any additional disclosure, as well as approval requirements for specific types of transactions, shall be determined and communicated by local management in accordance with applicable laws and regulations.
- e) Potential conflict of interest shall be first disclosed by employees to his or her direct supervisor or at the channel provided by each Group Company, as soon as the matter/issue arises and/or becomes apparent to his/her knowledge. The supervisor shall be responsible for raising such information to the Compliance function or the person in charge of further appropriate actions.
- f) Any employee who notices a case of active or passive conflict of interest, bribery, or self-dealing is expected to report the circumstances with any known evidence immediately to his/her supervisor or use INSEE Speak Up for reporting purposes.

## 5.4 Conflict of Interest Review

- a) For each conflict of interest disclosed with potential concerns/impacts to several functions, the CEO of that Group Company will appoint the competent panel consisting of at least three members from several functions e.g., Human Resources, Compliance function, or the person in charge, and the supervisor of the person with conflict to conduct a careful review of such declared conflict of interest.
- b) Any involvement in an external activity or position, such as taking up a directorship, advisor, agency, speaker, or employment outside the Company, employees must

make sure it will not interfere with the work for the Company and must comply with the Company's Code of Business Conduct, rules and regulations.

Prior to the involvement in the above-mentioned activities, employees must report at the provided channel and obtain approval from the CEO of their own Group Company. For the CEO of each Group Company and the GEXCO members, approval must be obtained from the Nomination and Compensation Committee (NCC).

## **5.5 Records and Maintain the Disclosure of Employees**

- a) Any approvals, denials, or firewalls resulting from the conflicts of interest disclosure must be documented in writing and stored in the particular personnel's file of such personnel at the Human Resources function.
- b) The Human Resources function shall maintain such disclosure documentation for the time period prescribed for legal documents under the Document Retention Policy.

## **5.6 Prohibited Business Courtesies**

The following are examples of business courtesies that one must not give/accept/offer:

- a) Cash or cash equivalents such as gift certificates, and gift cards not in a ceremony or on occasions in accordance with custom and tradition.
- b) Gifts and entertainment are prohibited by law.
- c) Bribes, payoffs, kickbacks.
- d) Services or non-cash benefits such as a promise of employment.
- e) Product or service discounts are not available to all employees or do not form part of a normal sales promotion.
- f) Gifts to/from family members of a supplier, customer, or business partner (except traditional or customary norms, e.g., wedding, funeral, ordination, etc.).
- g) Tickets and/or passes for an event not attended by the host.
- h) Travel and/or transportation and/or lodging of the 3<sup>rd</sup> party cost.
- i) Lavish or extravagant in the context of business occasions and customs.
- j) Gifts/entertainment where the intention is to carry favor or influence or appear to influence, a specific business decision/outcome.
- k) Entry to adult entertainment clubs or adult inappropriate events.
- m) All forms of political help and support.

## **5.7 No Gift Policy**

The Group is fully committed to conducting business with integrity. In line with this commitment, the Group adopts a "No Gift Policy" whereby our employees are not allowed to receive anything of value from current or potential customers, vendors, agents, or business partners. This No Gift Policy supports our Personnel to conduct their work in a fair, objective, and independent manner and to prevent any conflicts of interest or appearance of such in our business dealings.

If an employee has any doubts or is seeking clarification of this No Gift Policy, the employee should check with his/her superior. If the superior is uncertain, the Compliance function or the person in charge should be referred to ensure consistent treatment across the Group.

### 5.8 Guidelines on Offering and Receiving

Offering	Receiving
<p>a) The offering of gifts, entertainment, hospitality, donations, and sponsorships must be of modest value and only occasional. The approval shall first be obtained prior to a decision about whether to offer as indicated in Clause 5.9 and Annex 2.</p> <p>b) The offer must be appropriate for legitimate business purposes, customary, and enhance the Company and the Group's image such as the Company's products, e.g., pens, notebooks, calendars, diaries, etc.</p> <p>c) Business courtesies must not influence or appear to influence the business decision-making and create a potential conflict of interest.</p> <p>d) Employees are not allowed to offer gifts, souvenirs, assets, or any other benefits to spouses, children or related government officials, customers, or business partners because such offering may consider as offering indirectly.</p> <p>e) Respect and adhere to customer, supplier, and other stakeholders' policies that may not permit the acceptance of gifts or entertainment.</p> <p>d) The following activities shall NOT apply and cover under the Conflicts of Interest Policy, but refer to:</p> <ul style="list-style-type: none"> <li>- Sales and marketing promotions</li> <li>- Customer Relationship Management (CRM) activities</li> <li>- Business courtesies, which are reasonable and of modest value, which are offered to major strategic partners</li> </ul>	<p>a) Employees at all levels must not accept gifts, entertainment, hospitality, or other benefits from external parties, whether on or off company premises. The acceptance of donations or sponsorships is also prohibited unless expressly approved in advance by the GC-CEO.</p> <p>b) Employees are required to professionally inform the externals of the Group's No Gift Policy. Employees will request that vendors respect our Group policy and not purchase and deliver any gift for an individual, a department, or an employee's residence, at any time, for any reason.</p> <p>c) No gifts of any kind that are offered by externals, no matter what the value, will be accepted by any employee or their family members, at any time, on or off the work premises.</p> <p>d) Gifts of food that may arrive during the holidays, and at other times of the year when gift giving is traditional, belong to the entire staff even if addressed to a single employee. Under no circumstances may an employee take a food gift home; food gifts must be shared with and distributed to all staff, with email notice, during work hours, in a central, worksite location.</p> <p>e) Employees must only participate in business entertainment when it is an integral part of business building activities.</p>

	<p>f) Employees are not allowed to demand gifts, entertainment, hospitality, donation, incentives, or any other benefits from any individual or entity engaging in any business with the company, either as company representatives or as private persons.</p>
<p>Tips on managing and offering gifts:</p> <ul style="list-style-type: none"> <li>- Never give cash or cash equivalents, such as gift cards.</li> <li>- Do not give gifts frequently to the same individual or group.</li> <li>- Build business relationships through recreational activities instead of private meals or functions.</li> <li>- Present gifts openly and in front of a group of people.</li> <li>- Give gifts for official, rather than personal use.</li> <li>- Give gifts that are perishable, such as plants, or consumables.</li> <li>- Give gifts that an entire office can share instead of just one individual.</li> <li>- Give gifts with a corporate logo that promotes the Company but does not have retail value.</li> <li>- Provide sample products (of nominal value) from the Company.</li> <li>- Give gifts of nominal value and anything above that value must obtain approval (see Annex 2).</li> <li>- Make sure that any gift complies with both local law and the internal policies at the official company.</li> <li>- In case of unsure, check with Compliance function or the person in charge in advance of giving.</li> </ul>	<p>Tips on managing receiving gifts:</p> <ul style="list-style-type: none"> <li>- If declining the gift is not appropriate or necessary to maintain the business relationship with the giver, the recipient must report any gift received from external parties valued at THB 1,000 (USD 30) or more through the designated Reporting Platform (see Annex 2) within 15 business days of receiving the gift or benefit.</li> <li>- Exemptions from this No Gift Policy and do not require to report are gifts value less than THB 1,000 (equivalent to USD 30) such as t-shirts, pens, goodies bags including cards, thank you notes, certificates or other forms of thank you and recognition that employees obtain as members of the public at events such as seminars, conferences, training events etc. that is offered equally to all participants of the event.</li> <li>- In case the value is not easily established, an employee should have SML or Compliance function to assist in verifying the estimated retail value. Deliberately undervaluing a gift or business courtesy or avoiding reporting, it may be official misconduct.</li> <li>- Acceptance of proposal for meeting, training course, seminar, work visit under business partner's budget is not allowed. If the arrangement needs to be under third party's budget, the employees must obtain approval from the Group CEO before accepting the offer.</li> </ul>

## 5.9 Determining Values and Approval

Offering	Receiving
<p>a) Permissible values of offering gift, entertainment and hospitality shall be the value less than or equal to <b>THB 3,000 per (equivalent to USD 100) per person per occasion.</b></p> <p>b) The expenses should demonstrate a valid business purpose and reasonable with provable evidence.</p> <p>c) Always obtain approval from SML or above when offering according to normal practice.</p> <p>d) The offering value over than specified above and/or exceed the annual budget/plans or request for deviation or exception beyond the guideline under this Policy must be approved by any two EXCO members or the Group Company CEO and Group Company CFO.</p> <p>e) The offering business courtesy for the following activities must be approved by the Group Company CEO or assigned CEO (refer to MOA).</p> <ul style="list-style-type: none"> <li>- Activities related to corporate social responsibilities</li> <li>- Sponsorships</li> <li>- Donations made for religious and not-for-profit purposes</li> <li>- Activities related to government relations</li> </ul>	<p>a) <b>Low-value items below THB 1,000 (equivalent to USD 30)</b> such as simple promotional souvenirs (e.g. pens, diary) or modest refreshments like cookies, coffee or tea served during a meeting may be accepted only when refusal would be inappropriate and only if they do not create or appear to create a conflict of interest.</p> <p>b) The receiving of the gifts, entertainment, and hospitality value above the specified shall report at the provided Reporting Platform (see Annex 2) in each Group Company within 15 business days after the receiving the gift or gratuity.</p>

## 6. Compliance and Consequences for Non-Compliance

All entities within the Group, including their Employees, Management, and Directors, as well as any individuals who represent or perform work on behalf of the Group, must fully comply with this Policy. They are also responsible for ensuring that appropriate resources are allocated to support its effective implementation. Regular reviews will be conducted to ensure that the implementation of the Policy remains robust, suitable, and effective.

Any individual who breaches this Policy may be subject to disciplinary action, up to and including dismissal or termination of employment.

## **7. Policy Measurement Metrics**

The Conflicts of Interest Declaration Form shall be implemented at least on an annual basis throughout the Group. The process to review any conflict as declared or reported shall be conducted and resolved timely.

Violations and business courtesies received or given which do not meet the determining value in this Policy must be recorded and reviewed regularly, in order to assess the effectiveness of this Policy and determine measures for improved enforcement.

Regularly communicate the No Gift Policy to all stakeholders such as employees, management, directors including customers and business partners through internal and external media for example employee annual meeting, announcement on bulletin board, company's intranet, website, and annual report, etc.

## **8. Policy Exemptions**

No exceptions to this policy are allowed unless clearly approved in writing.

Any variations to this Policy shall be reviewed by the Document Manager and proposed to Document Owner before submission to the Group CEO for approval.

## **9. References**

- a) Code of Business Conduct
- b) Travel and Entertainment Policy
- c) Anti-Bribery and Corruption Policy
- d) Whistleblowing Policy
- e) Manual of Authority
- f) Document Retention Policy

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## Annex 1: Document Approval and Version History

### Document Approval

Approval Date	22 October 2025
Effective Date	22 October 2025
Next Review End Date	01 January 2028
Document Manager	Thomas Natter – Head of Group Internal Audit and Compliance
Document Owner	Ranjan Sachdeva - Group CEO
Approver	Ranjan Sachdeva - Group CEO
Document Location	INSEE Portal/Internal Compliance/Governance Documents

### Version History as the Group

The following table records all the revisions made to this document:

Version	Date	Description	By
1.0	27 May 20	Approved - Transfer to new template and cancel PL-CEOO-GIAC-001, DI-CEOO-GIAC-001	Aidan L.
	01 Jun 20	Effective	
	17 Jun 21	Reviewed	Ranjan
	26 Oct 21	Approved	Aidan
	26 Oct 21	Effective	
	15 Sep 23	Reviewed	Thomas
2.0	31 Oct 23	Approved	Aidan
	31 Oct 23	Effective	
	05 Aug 25	Reviewed	Thomas
	22 Oct 25	Approved	Ranjan
	22 Oct 25	Effective	

## Annex 2: Approval Matrix

A: Approver R: Reviewer P: Proposer I: Information

Descriptions	NCC	GC-CEO	Supervisor	Compliance	Filing at the reporting channel *
<b>Conflicts of Interest</b>					
GEXCO or GCCEO would like to join Directorship, Advisor, or Agency outside the Company or the Group	A				I
The employee at any level after GCCEO would like to join Directorship, Advisor, Agency, or be a speaker outside the Company or the Group		A			I
Report and/or disclose actual or potential conflicts of interest **			R	R	I

\* Please ask the Compliance representative in your country how to file the report.

\*\* Compliance Function shall review the disclosure and confirm back to the employee whether any or no concerns. Please also refer to Clause 5.4.

Descriptions	GCEO	GC-CEO	EXCO	TML/SML	Compliance	Filing at the reporting channel *
<b>Offering and/or receiving to/from externals</b>						
Offering business courtesies to externals for the value up to THB 3,000 (USD 100) per person per occasion				A		
Offering business courtesies more than THB 3,000 per (USD 100) per person per occasion or request for deviation or exception			2 EXCO Members			
Offering business courtesies for the following activities: <ul style="list-style-type: none"> <li>- Activity related to corporate social responsibilities</li> <li>- Sponsorship</li> <li>- Donation for religious and not-for-profit purposes</li> <li>- Activity related to government relation affairs</li> </ul>		Refer to MOA				
Acceptance of proposal for meeting, training course, seminar, work visit under business partner's budget	A				I	I
Disclosing the receiving of business courtesy valued at THB 1,000 (USD 30) or more				I	I	I

### **Annex 3: Examples of typical conflicts of interest**

These are number of situations where conflict of interest is likely to arise. They intend to enhance the awareness of employees and, in addition, to serve as basis to avoid disclosure and/or approval according to this policy. It is not a comprehensive list.

- Reporting to a supervisor who is a relative or close friend and has control over job responsibilities, salary, and promotions.
- Having a personal or close relationship with a supervisor, subordinate, or colleague who may be perceived as a conflict of interest.
- Hiring relatives or close friends to provide services without comparing with other vendors.
- Having a business relationship or giving advisory role with a supplier, distributor, service provider, customer or competitor of the Company or the Group that falls outside the scope of usual employment duties.
- Accepting fees and providing advice to customers or suppliers for personal gain.
- Starting a business that provides similar services and products to the Company or the Group.
- Working full time or part time for a company that competes with the Company or the Group.
- Accepting free trips and gifts from a vendor and then selecting, recommending, or influencing the purchase of the products or service.
- Accepting a favor or a gift from externals valued at THB 1,000 (USD 30) or more THB 1,000 (equivalent to USD 30) and does not report.
- Owning part of a business that sells goods or services to the Company or the Group.
- Taking advantage of confidential/non-public information learned on the job for your own benefit.
- Employee or employee's family members receive personal discounts or other benefits advantages that are not available to all employees from suppliers, distributors, or customers of the Company.

**Annex 4: Conflicts of Interest Declaration for New Hire**

Name Last name:	Position:
Function:	Company (“the Company”):

Siam City Cement Public Company Limited and its subsidiaries directly and indirectly held (collectively called “the Group”) place some restrictions with which you must comply regarding business interests to determine that you are in compliance with these provisions, you are required to complete the following information when you are first employed by one of the companies in the Group. The Company will include this document in your personnel file.

1. Do you have a person with close relationships working in the Company or the Group?

*Close relationships mean*

- *the family members with close relationships to you either related by blood, including parents, grandparents, children, siblings, or relationship from registration under laws, including spouse, stepchildren, foster-parent*
- *individuals whom you have a close relationship with, including partner (not married but in a relationship), mothers-, fathers-, brothers-, and sisters-in-law*
- *someone who is financially dependent on you or you are financially dependent on them*
- *any juristic person having its family member as a major shareholder (holding shares more than 10%) or its family member collectively hold shares more than 30%.*

- No  
 Yes

If “Yes”, please provide the details.

Name	Position	Division	Relationship

2. Do you have the person(s) with close relationships work for or have any business transaction that carries out business as the Company or the Group’s vendor, contractor, customer or competes (“competing company”) with the business of the Company or any company in the Group?

- No  
 Yes

If “Yes”, please provide the details.

Name(s)	Position	Company	Type of Relationship*

3. Have you received tangible/intangible benefits from the person with close relationship who have business or competing with the Company or the Group?

- No
- Yes

If "Yes", please provide the details and identify the type of relationship\*.

Name(s)	Position	Company	Type of Relationship*
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4. Are you a shareholder of other juristic persons which you have the controlling and management decision or are you an employee of another juristic person which you work full time or part-time?

*Any involvement in an external activity or position, such as taking up directorship, advisor, agency, speaker or employment outside the Company, employees must declare under this part.*

- No
- Yes

If "Yes", please provide the details.

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5. Are you one of the major shareholders, director or executive management of other juristic persons which have had business deals with the Company in the past 5 years?

- No
- Yes

If "Yes", please provide the details.

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6. If you have any other potential conflict of interest, please list them below describing the nature of the conflict and the parties involved. If none exist, please indicate "No conflict" below.

- No conflict
- Conflict

If “Yes”, please provide the details.

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I confirm that I have read and understood the Group Conflict of Interest Policy. The information I have provided is correct and complete to the best of my information and knowledge at the time of the report.

I also understand that if there are any changes to the above information, I am responsible for reporting to my supervisor through INSEE Portal.

Place: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

*Types of relationship includes:*

1. *Supplier*
2. *Distributor*
3. *Service Provider*
4. *Consultant*
5. *Customer*
6. *as employee/director/partner/consultant/owner or hold more than 10% shares in other or competitor company*
7. *as director, trustee, officer, consultant in charitable/sports/volunteer/civic organization which has a business with the Company or that is financially supported by the Company*
8. *Political, judicial, or administrative function or governmental position as a result for permits and regulatory approvals are required by the Company*

## Annex 5: Annual Conflicts of Interest Declaration and/or when there is change

To support the operation with honesty and transparency, employees are obliged to disclose information about actual conflicts and potential conflicts when there are changes to the recent disclosure in order to avoid situations that may cause consequences from not disclosing information about conflicts of interest between themselves and the Company.

1. Do you have any “close relationship” with anyone who works for the Company or any company in the Group?

*Close relationships include:*

- *Family members: parents, grandparents, children, siblings, spouse (registered or unregistered), adoptive parents/children.*
- *People living with you in a partner relationship (not married).*
- *In-laws: parents-in-law, siblings-in-law.*
- *Anyone financially supporting you or whom you financially support.*
- *A company where your family members, partners, or in-laws*
  - *holds more than 10% of shares, or*
  - *your family collectively holds more than 30% of shares.*

- No  
 Yes

If “Yes”, please provide the details and confirm whether you are in the position to consider or approve the transaction.

Name(s)	Relationship	Position / Division
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2. Do you have a “close relationship” (as defined above) with anyone who works for or has business dealings with the Company as

- Vendor
- Contractor
- Customer
- Competitor (company competing with the Group)

- No  
 Yes

If “Yes”, please provide the details.

Name(s)	Position	Company	Type of Relationship
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3. Are you involved with any external organization, such as
- Holding shares and having control in another company.
  - Working in another company (full-time or part-time).
  - Serving as a director, advisor, agent, guest speaker.
  - Any roles or positions that were previously approved by the Company and are still active at present.

*Employees must declare any involvement in external activities or positions, such as serving as a director, advisor, agent, guest speaker, or engaging in employment outside the Company. Employees who have previously disclosed or received approval for such activities must continue to declare them until the status is terminated or canceled.*

- No  
 Yes

If “Yes”, please provide the details.

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4. Under the Group No Gift Policy, employees should not accept gifts, hospitality, or benefits from third parties. If refusal is not practical and a gift is received, it must be reported.

As stated in the Group Conflict of Interest Policy (PL-GR-003), any gift or benefit valued at THB 1,000 (USD 30) or more must be disclosed within 15 business days via the INSEE Portal.

**In the past 12 months, have you received any gifts or benefits from any third party that does business with the Company, which you have not yet reported?**

*Consider items such as gifts, loans, donations, educational expenses, tickets to sporting events or shows, favors, invitations to conferences, seminars, work visits, or travel abroad, including fares and travel expenses, car rental costs, hotel room expenses, or receiving services from suppliers, customers, outside auditors, or attorneys at favorable rates. This also includes any airfare and other transportation costs (including rental cars) and lodging, whether related to conferences or events organized by the third party or otherwise.*

- No – I have not received any such gifts/benefits.  
 Yes – I have received such gifts/benefits and already reported them.  
 Yes – I have received such gifts/benefits but have not yet reported them.

If it has not yet been reported, please provide the details below.

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5. Do you have any other actual or potential conflicts of interest?

*A conflict of interest occurs when your personal, financial, or professional relationships or activities could influence or appear to influence your ability to make impartial decisions in the best interest of the Company.*

*You may have a conflict of interest if you have a personal or financial connection with:*

- a supplier*
- a distributor*
- a service provider*
- a consultant*
- a customer*
- Holding more than 10% shares in another company or a competitor*
- Serving as a director, trustee, officer, or advisor in an organization that has business with or receives support from the Company*
- Holding a government, political, judicial, or regulatory position that could influence permits or approval for the Company*

- No conflict
- Conflict

If “Conflict”, please describe the conflict and your relationship to the parties involved.

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I confirm that I have read and understand the Group Conflict of Interest Policy and that the information I have provided is correct and complete in the best of my information and knowledge at the time of the report.

I also understand that if there are any changes to the above information, I am responsible for reporting to my supervisor through INSEE Portal.

Place: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Supervisor’s Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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