



**Central Plaza Hotel Public Company Limited**

## **Anti-Corruption and Bribery Policy**

**(2026 Edition)**

Approved by Board of Directors Meeting No. 7/2025  
on 14 November 2025

Prepared by Risk Management Department

**PUBLIC**

## Message from the Chairman of the Board and CEO

### Central Plaza Hotel Public Company Limited

**CENTRAL PLAZA HOTEL PUBLIC COMPANY LIMITED** adopts a transparent and ethical approach to conducting business, firmly adhering to social responsibility and stakeholders following good governance and business ethics. In addition, recognize that corruption not only affects business operations, reputations, and Company image but also poses an obstacle to the sustainable growth of the Company and national development.

The Company has joined the Collective Action Coalition (CAC) in the private sector of Thailand to ensure that the Company has policies defining responsibility, practices, and guidelines for conducting business that may pose to risk of corruption. These have been comprehensively considered and implemented. Therefore, the Company has established this “Anti-Corruption Policy” as a written commitment to serve as an explicit guideline for the business conduct and sustainable growth of the organization

The Company has established an “Anti-Corruption and Bribery Policy” that requires the board of directors, executives, and employees to strictly adhere to it as part of work discipline. In the event of non-compliance with the policy, directors, executives, or employees will be subjected to investigation and disciplinary action following the Company’s regulations, as well as applicable law. However, the Company must not demote, punish, or negatively affect directors, executives, and employees who refuse to take part in corruption even though such refusal may deprive business opportunities. The Company is dedicated to opposing corruption while supporting Business partners, allies, and stakeholders to be aware and emphasize that corruption poses a severe threat that ruins fair competition and justice, resulting in detriment to economic and social development. The Company has established channels for reporting or complaints to the Company’s audit committee in the event of incidents or any actions that may indicate corruption or improper conduct by individuals.

On behalf of the Board of Directors and the management, we request all our directors, executives, and employees to master and strictly comply with the guidelines illustrated in this document to jointly enhance our Company into a transparent entity, trusted by all stakeholders. This achievement would be a key foundation for business and sustainable growth.

Mr. Norachit Sinhaseni

Chairman of the Board

1 January 2026

Mr. Thirayuth Chirathivat

Chief Executive Officer

1 January 2026

## Anti-Corruption and Bribery Policy (2026 Edition)

Central Plaza Hotel Public Company Limited.

### 1. Objectives

1. To ensure that the Company's employees demonstrate a standpoint against corruption.
2. To define criteria and guidelines for the Company and employees to comply with the policy.
3. To specify the reviewing and monitoring process to ensure that the Company has adhered to the policy.
4. To establish communication guidelines for the anti-corruption policy of the organization, including subsidiaries, affiliated companies, entities under the Company's control, business partners, and stakeholders, as well as the public.
5. To raise awareness and encourage employees to be vigilant and report every instance of corruption via secure and trusted communication channels.

### 2. Definitions

Any message identified in this policy shall have the following meanings unless expressly stated or explained otherwise.

**“Company”** means Central Plaza Hotel Public Company Limited.

**“Subsidiary” or “Associate”** means companies as defined by the Securities and Exchange Act and the announcement of the Office of the Securities and Exchange Commission.

**“Company employee”** means the Company's directors, executives, and employees.

**“Stakeholders”** means shareholders, investors, employees, customers, business partners, creditors, business competitors, public sector, enterprises, society, communities, and environments.

**“Business Partners and Affiliates”** means manufacturers, contractors, vendors, suppliers, and/or service providers, as well as agents, intermediaries, and any business partners, whether juristic persons or natural persons, engaged with the Company. This also includes subcontractors of such manufacturers, contractors, vendors, suppliers, and/or service providers. The term covers both existing and new business partners and suppliers.

**“Fraudulence”** means intentional actions to violate laws, regulations, and internal policies of the Company, as well as ethical standards in conducting business, to gain an improper advantage unlawfully. Typically, corruption involves deceptive actions, bribery, falsification of documents, coercion, embezzlement, false claims, conspiracy, fraud, and intentional truth concealment to obtain or retain inappropriate benefits of the business.

**“Corruption”** means direct or indirect using power without authorization to obtain undeserved benefits, giving or accepting bribes, offering contracts, promising, demanding, giving or accepting benefits (cash or others) to government officials, government agencies, private agencies, or any relevance to induce other act or omit to perform duties or to obtain improper business benefits.

**“Bribery”** refers to any act of offering, promising, giving, receiving, or soliciting benefits to influence someone to act inappropriately, unlawfully, immorally, unethically, or in violation of laws, regulations, policies, or trust.

### 3. Anti-Corruption and Bribery Policy

3.1 All directors, executives, employees across all levels, and representatives of the Company, including its subsidiaries, affiliates, and other controlled entities, are required to strictly comply with the Anti-Corruption and Bribery Policy without exceptions. They are prohibited from requesting, participating in, or accepting any form of bribery or corruption, whether directly or indirectly, for personal gain, organizational benefit, or advantages for family, friends, acquaintances, or business purposes. This policy extends to all domestic and international operations and any associated entities of the Company.

3.2 Business operations and procurement processes must be conducted with transparency, integrity, and compliance with applicable laws.

3.3 The Company is responsible for conducting regular reviews of compliance with the Anti-Corruption and Bribery Policy at least once per year. Moreover, operational procedures and guidelines must be updated to align with the business changes, regulations, and Thailand's Anti-Corruption and Bribery laws. Any involvement in, support for, or facilitation of corruption or bribery will be subject to disciplinary actions within the Company's regulations.

### 4. Duties and Responsibilities

To ensure the comprehensive implementation of the anti-corruption policy and measures throughout the organization, with explicit supervision. The Company therefore outlines the duties and responsibilities of individuals or units specified below:

#### 4.1 The Board of Committee

- The Board of Committees is responsible for establishing and approving policies and measures related to Anti-Corruption and Bribery.

- Oversee a system that supports anti-corruption to ensure that the management is aware of and emphasizes anti-corruption, as well as instill employees to become part of the organizational culture.
- Review reports on the implementation of the Anti-Corruption and Bribery Policy and Measures.  
 Examine urgent issues regarding corruption to ensure timely supervision

#### 4.2 The Audit Committee

- The Audit Committee is responsible for examining the financial reporting system, internal control system, and internal audit system of the Company to ensure sufficient internal controls. This also audits the operations to efficiently comply with the policies.
- Auditors are responsible for ensuring compliance with announcements, operational guidelines, and relevant laws by reviewing internal and external audit findings. They must also oversee the implementation of the Anti-Corruption and Anti-Bribery Policy and measures recommended by the internal audit team, ensuring these are consistently followed.
- Examine urgent issues regarding corruption to ensure timely supervision.

#### 4.3 The Risk Management, Corporate Governance and Sustainability Committee

- The Risk Management, Corporate Governance and Sustainability Committee is responsible for overseeing the Company's assessment of corruption and bribery risks. This includes reviewing issues and risk indicators related to corruption and bribery, monitoring the effectiveness of Anti-Corruption and Bribery risk management, and ensuring that risk management measures are maintained at an acceptable level as presented by the Risk Management department.
- Consider and approve the risk management and review the result and risk verification and monitoring result presented by the Corporate Risk and Legal Department as well as report the consideration to the Board of Committee for acknowledgement.
- Consider the review and update of the Anti-Corruption Policy, Measures, and Practices presented by the Corporate Risk and Legal Department, as well as report the consideration result to the Board of Committee for acknowledgment.

#### 4.4 Management

The Chief Executives Officer and Management have a responsibility to establish systems and encourage and support the Anti-Corruption and Bribery Policy to cascade to employees and stakeholders, reviewing the appropriateness of the systems and measures to align with the business transformation, regulations, rules, and legal provisions.

#### 4.5 Internal Audit

Internal Audit is responsible for reviewing internal audit and verifying the operations to ensure to conducted accurately in line with the policies, practices, delegated authorities, codes of conduct, and laws to ensure appropriate and sufficient control systems against corruption risk as well as report to the Audit Committee.

#### 4.6 Risk Management

- Develop and review the Anti-Corruption and Anti-Bribery Policy, practices, and measures to ensure alignment with changes in business operations, Thailand's anti-corruption and anti-bribery laws, regulations, and rules. The policy, practices, and measures should be implemented by establishing a system that promotes, supports, monitors, and communicates these guidelines equally to all Company personnel and stakeholders without discrimination, ensuring that employees adhere to the Anti-Corruption and Anti-Bribery Policy, practices, and measures.
- The Corporate Risk and Legal Department assumes responsibility for considering and verifying the issues and indicators of risks related to corruption.
- Monitor the outcomes of risk management on corruption and operation to ensure that the risks are at an acceptable level and the risk management measure is consistently complied with.
- Report the Company's risk review results, management procedure as well as monitoring results to the Risk Management, Corporate Good Governance, and Sustainability Committee.
- Review, monitor, and consider the transaction related to the implementation of the Anti-Corruption and Bribery Policy, Measures, and Practices.
- Annually review the Anti-Corruption and Bribery Policy, Measures, and Practices as well as report to the Risk Management, Corporate Good Governance, and Sustainability Committee for consideration.

- Provide primary guidance on the Anti-Corruption and Bribery Policy and Measures including coordinating consulting with relevant departments with accurate, comprehensive, and explicit information.

#### **4.7 Office of the Company's Secretary**

- The Office of the Company Secretary is responsible for coordinating with regulators and information-sharing with other agencies to improve anti-corruption and bribery activities.
- Coordinate and communicate the Board-defined scope of measures with relevant departments.

#### **4.8 Human Resources Department**

It is the responsibility to establish a human resource management process that reflects the Company's commitment to complying with the Anti-Corruption and Bribery Policies and practices. This includes providing training on the policy and measures to those involved, ensuring comprehensive coverage. The process also involves tracking and storing acknowledgment forms to confirm that executives and employees understand and commit to adhering to the Anti-Corruption and Bribery Policy and practices.

#### **4.9 Company Employees**

The Company employees are obligated to adhere to the Anti-Corruption and Bribery Policy as well as related regulations and policies, refraining from either engaging in direct or indirect anti-corruption. In addition, solicitation, operation, or any other action related to corruption or bribery is prohibited for the purpose of obtaining benefits for personal, family, confidants, or acquaintances.

### **5. Guideline for Practices**

#### **5.1 General Sections**

- 1) The Company has a zero-tolerance policy against corruption and collusion in all instances and complies with all relevant laws related to anti-corruption in Thailand.
- 2) The Company will not engage in corruption, both directly and indirectly, and is committed to implementing effective systems to combat corruption and bribery.
- 3) Company employees must not engage in or participate in corruption, including giving or receiving bribes in any form, both directly and indirectly. Company employees are obliged to adhere

to the anti-corruption policy, corporate governance policy, business ethics, interrelated transaction policy, as well as other relevant regulations and requirements.

4) Company employees must avoid actions that create conflicts of interest with the Company, whether directly or indirectly. Any actions taken must be reasonable, based on the foundation of acting in the best interests of the Company, in compliance with relevant laws and regulations. If there is any action or incident that falls within the scope of a conflict of interest with the Company, the personnel concerned are obligated to report the conflict of interest through the channels specified by the Company.

5) The Company conducts a risk assessment on corruption and bribery and establishes measures related to the risk in line with the internal control system.

6) The Company establishes sufficient comprehensive operational procedures for implementation in line with the policy for corruption and bribery prevention in the business.

7) The Company provides orientation and training on Anti-Corruption and Bribery Policies and Measures for all employees.

8) The Company establishes an internal control system to ensure an effective and efficient Anti-Corruption and Bribery Policy, including financial records, accounting, human resources, and other relevant operations of the Company.

9) The Company reports, monitors, and reviews concerning Anti-Corruption Policy with the appropriate procedures to ensure comprehensive, sufficient, and prevailing situations.

10) The Company establishes secure communication channels on Anti-Corruption and Bribery Policy and Measures with all employees and related stakeholders, including preventive measures in place to preserve the rights of related parties.

11) The Company internally and externally communicates on the Anti-Corruption and Bribery Policy to widely adhere to, including notifying subsidiaries, associates, controlled companies, and business representatives.

12) The Company encourages to exchange of knowledge, experience, and best practices with related industry companies as well as relevant stakeholders to foster collaborative practice and participation in anti-corruption organized by the Company, associations, the chamber of commerce, or relevant agencies.

## 5.2 Political participation

- 1) The Company is politically neutral and has no policy to provide political contributions (cash/assets) or engage in actions affiliated with political parties or groups, as well as the Company commits to avoiding any activities that support political parties or groups.
- 2) The Company employees have the rights and freedom under the constitution; nonetheless, the Company employees must not employ the Company assets or provide its services in support of political activities or other actions potentially implying the Company's participation or support for political parties or groups.

## 5.3 Charitable Contribution

- 1) Donations and contributions to charity in the form of financial contributions or any other form (providing knowledge) to be a part of social responsibility activities, as well as to communicate the Company's public relations and positive image. This can be carried out in several ways, e.g., supporting cultural activities, arts, education, health, communities, etc.
- 2) Undertaken properly, openly, transparently, morally, and under Company regulations, as well as not opposed to government agencies, state enterprises, and relevant agencies.
- 3) Compatible with the policy on procurement, society, communities, and the environment, as well as supporting activities to lead to Company sustainability, or classified as public services.
- 4) Not used as an excuse for corrupt practices
- 5) Without hidden purposes to bolster advantage or induce business favor.
- 6) Not leading to conflicts of interest between oneself and the Company.
- 7) Donations or contributions must be put in writing as a memorandum for approval, stating objectives and the clear name/recipient agencies, complete with supporting documents for review, as well as the Company's authorities to approve before proceeding further.

## 5.4 Facilitation payment

- 1) The Company has none of the policy to pay facilitation payments or bribes to government officials or state enterprises to induce action or required operation that is under the official's responsibility.
- 2) The government agencies must be properly, openly, and transparently dealt with, not conflict with the Company's morality in line with the Company's regulation, as well as not be against the rules of government agencies, state enterprises, and other related agencies.

## 5.5 Giving and Receiving of Gifts, Entertainment, Reception, or Other Benefits

- 1) The Company employees are aware of giving or receiving gifts, entertainment, and receptions. Actions are required to exclusively adhere to the business objectives or customs with appropriate value as well as not affect the decision of operations.
- 2) Undertaken properly, openly, transparently, and morally, following the Company's regulations, not against government agencies, state enterprises, and relevant agencies.
- 3) Suiting the circumstances, festivals, and customs of each local area.
- 4) Not used as an excuse for corrupt practices.
- 5) Not leading to conflicts of interest between oneself and the Company.
- 6) No gifts, entertainment, reception, or other benefits are to be given or accepted if such affects the Company's operation.

## 5.6 Conflict of Interest

- 1) The Company establishes a policy to strictly prevent and eliminate conflicts of interest by adhering to business ethics to ensure transparency in business operations.
- 2) The Company establishes a policy for all directors, executives, and employees to avoid any action related to oneself, a person, or a juristic person that may cause the Company's conflicts of interest, whether directly or indirectly, or seeking personal benefits or related party's benefits.
- 3) The Company assigns the disclosure and submission of the stakeholders' information that has its own and related parties' interests, feasibly causing the Company's conflicts of interest in line with the Company's rules and regulations.
- 4) The Company assigns the Internal Audit Department to be responsible for auditing and evaluating the operations in line with this policy.

## 5.7 Government Officials Hiring

- 1) The Company has none of the policy to hire or designate government officials who are still in a position to work in the organization.
- 2) Hiring or designation of the government officials shall be a two-year gap for the designation of retired former government officials or a person who has worked for a supervisory agency directly related to the Company.
- 3) The Company has a background check process for a person who will be nominated by the Company for designation as the Company's directors, consultants, and executives, so as to verify the potential conflicts of interest prior to designation.

4) The Company requires the disclosure of the list of names and records of former government officials who have been appointed as the Company's advisors, directors, or the Company's executives for transparency

### 5.8 The Company and Individuals Involved in Business

- Subsidiaries and affiliated companies that the Company has the authority to control

The Company will inform and support its subsidiaries and affiliates under its control to comply with the anti-corruption and anti-bribery measures.

- Business Representatives and Intermediaries

Employees are prohibited from hiring any business representatives or intermediaries with the intent of giving or receiving bribes or engaging in corruption and bribery.

- Manufacturers, contractors, vendors, suppliers, and/or service providers, as well as agents, intermediaries, and business partners, whether juristic persons or natural persons, engaged with the Company, including subcontractors of such manufacturers, contractors, vendors, suppliers, and/or service providers. This shall cover both existing and new business partners and suppliers (Existing and New Business Partners and Suppliers).

The Company will ensure that the procurement and services are conducted fairly and transparently. It will carefully evaluate and select manufacturers, contractors, suppliers, subcontractors, and service providers, whether individuals or legal entities, including their subcontractors. This process applies to both existing and new business partners. The Company will communicate this policy to all relevant parties and reserves the right to cancel procurements or contracts if corruption or bribery is discovered. Additionally, the Company has implemented regular audits to review systems, procedures, procurement processes, and contract management.

### 5.9 Risk Assessment

The Company conducts an annual assessment of potential risks related to fraud, corruption, and bribery, as well as during events such as mergers, acquisitions, or joint ventures with business partners. This aims to ensure that all company departments evaluate potential risks, review the risk of corruption and bribery arising from operations, and implement an appropriate and timely mitigation plan. Furthermore, the Company regularly reviews its risk management measures to maintain them at an acceptable level. Risk assessment of corruption and bribery consists of three main steps:

**1) Set the risk assessment framework** in terms of impact and likelihood, as well as defining the Company's acceptable level of risk (Risk appetite).

**2) Identify risks**, determine the existing internal control, evaluate internal control, and analyze the severity and likelihood of risks both before and after applying existing controls.

**3) Implement additional risk mitigation measures** to reduce risks to an acceptable level if the existing internal controls are found to be insufficient in preventing fraud, corruption, or bribery risks.

The Company conducts regular reviews and assessments of fraud and corruption risks and reports the results to the Risk Management, Corporate Governance, and Sustainability Committee at least once a year. This objective aims to identify emerging risks or changes in existing risks, which may vary each year due to factors such as changes in operational procedures, the implementation of new technology systems, transformations in staff roles and responsibilities, or the development of new forms of fraudulent activity.

#### 5.10 Background Verification of Employees and Business Partners

1) Employee background verification plays an important role in enhancing the effectiveness of fraud, corruption, and bribery prevention. The Company assigns the Human Resources Department to conduct background checks on employees before hiring or being promoted. These checks are carried out in compliance with relevant laws and with the consent of the individual as detailed below:

- Pre-employment background screening is conducted to verify the candidate's qualifications, suitability, and experience, as well as to check for any history of fraud, corruption, or bribery related to their previous professional duties.
- Background screening prior to appointment to key positions within the Company is carried out to assess the individual's qualifications, experience, financial reliability, references, and any potential conflicts of interest associated with assuming the position.

2) Business stakeholders' background screening such as suppliers, agents, intermediaries, and business partners—is a key factor in strengthening the Company's efforts to prevent fraud, corruption, and bribery. The Procurement Department was assigned to conduct a background check on individuals or companies before entering into contracts or engaging in business transactions. These screenings are performed in compliance with the relevant laws and with the consent of the individual or business partners as follows:

- Background screening of individuals or business partners who will engage in transactions with the Company particularly all vendors, contractors, and service

providers—is conducted to assess their credibility, financial status, reputation, and qualifications related to the products or services. This screening includes estimation of pricing, quality, quantity, business terms, and marketing support, as well as verification of any past records of fraud, corruption, or bribery involving individual or business partners.

Accordingly, before forming any business partnership with employees or business stakeholders, it is essential to verify that their actions adhere to this policy and legal requirements. Any deliberate neglect of information or circumstances that could indicate possible bribery will constitute a violation of this policy and may result in the contract being terminated without delay.

### 5.11 Control

The Company maintains an effective control system to prevent fraud, corruption, and bribery. This covers the accounting process, data management, and business operations. The Internal Audit Department can report any issues promptly to the Chief Executive Officer and Audit Committee, who will then report to the Board of Directors. The Company undertakes the following measures:

1) Conduct regular annual audits by the Internal Audit Department to assess whether internal controls are sufficiently robust, ensure compliance with company policies and procedures, verify proper segregation of duties, and confirm that cross-checking mechanisms are in place. This also includes evaluating information technology systems to ensure they are designed with appropriate and stringent internal controls. Follow-ups are carried out to ensure that management fully implements corrective actions and addresses root causes to prevent recurrence—especially in high-risk areas or matters that may lead to fraud.

2) Protect whistleblowers and complainants, ensure fairness, and safeguard employees or individuals who report or provide evidence relevant to fraud, corruption, and bribery in the Company—including those who refused to engage in corruption. Protective measures are applied in line with the Company's whistleblowing and complaint policy to ensure the safety and fairness of those who report or cooperate in reporting wrongdoing.

3) Prepare and regularly submit audit and internal audit control reports to the Audit Committee.

### 5.12 Data Recording and Retention Processes

1) The Company maintains a policy to comply with standards, principles, and all applicable laws related to accounting and financial reporting.

2) The Company has established procedures for retaining documents and records to ensure they are available for inspection, in order to verify the accuracy and appropriateness of financial transactions. These procedures also ensure that no transactions are left unrecorded, unexplained, or falsified.

### 5.13 Communication

1) Communication must be done Anti-Corruption Policy and Measures with related parties, namely directors, executives, employees, subsidiaries, associates, controlled companies, business representatives, and business partners.

2) Communication must be done on punitive measures for violators of the Anti-Corruption and Bribery Policy and Measures. Additionally, it must be communicated that no demotion, punishment, or negative repercussions are to affect directors, executives, and employees who refuse to take part in corrupt practices. Even if such actions result in the Company losing business opportunities.

3) The Company must stage public disclosure about its Anti-Corruption and Bribery Policy and Measures.

Each time-related policies and measure are edited, communication and disclosure must follow through proper channels, including letters, emails, websites, printed media, and bulletin boards.

### 5.14 Training

1) The Company must stage orientation and training on the Anti-Corruption Policy and Measures for directors, executives, and employees.

2) The Company must encourage directors' and executives' participation in employees' education to set good examples for observance of the Anti-Corruption and Bribery Policy and Measures.

### 5.15 Human Resources

This Anti-Corruption and Bribery Policy extends to human resource management processes, including employee recruitment and selection, promotions, training, and performance evaluations, as well as includes a policy that prohibits position reduction, penalties, or negative consequences for employees who refuse to engage in corruption and non-compliance. Even if such actions may result in business opportunities loss for the Company, clear communication processes regarding this policy.

## 6. Whistleblowing and Request for Guidance

### 1) Whistleblowing or Complaints about Corruption and Bribery

Company employees must not ignore or disregard any actions that may violate the Anti-Corruption and Bribery Policy.

- (1) Observing actions, whether direct or indirect, may involve corruption and bribery within the organization, including receiving or giving bribes made by the Company employees to government officials or agencies.
- (2) Observing violations of Company procedures or internal control systems may raise concerns that they could open opportunities for corruption, bribery, or unethical behavior within the Company.
- (3) Observing the actions that may result in financial loss or Company's damage.
- (4) Observing actions that conflict with legal requirements, moral principles, company policies, or the Company's code of business ethics.

### 2) Channels for reporting whistleblowing or complaints about corruption and bribery.

The Company's employees are not to overlook or neglect any actions that may violate the Anti-Corruption Policy. The Company provides channels for reporting and safeguards to protect whistleblowers securely. When discovering acts of possible violation of the Anti-Corruption and Bribery Policy and Measures, employees must inform the Company through one of the following channels:

- Email: [whistleblower\\_centel@chr.co.th](mailto:whistleblower_centel@chr.co.th)
- Postal Mail: Internal Audit and Risk Management  
Centara Plaza Hotel Public Company Limited  
999/99 25<sup>th</sup> floor Rama 1 Road, Pathumwan District, Pathumwan, Bangkok 10330

### 3) Eligible Persons for Reporting Whistleblowing or Complaints about Corruption and Bribery

Individuals eligible to report whistleblowing or complaints about corruption and bribery include all stakeholder groups of the Company, such as shareholders, customers, competitors, creditors, government agencies, communities, society, Company executives, and employees. All complaints will be treated with the utmost confidentiality, and whistleblowers may report through multiple channels without being required to disclose their identity. However, if whistleblowers choose to disclose their identity, it may facilitate the Company in providing updates or additional details regarding the matter reported.

## 7. Measures to Protect Whistleblowers or Informants

The Company has established measures to protect whistleblowers reporting corruption and bribery in accordance with its whistleblowing policy, as follows:

1) The complainants may remain anonymous if they believe revealing their identity could result in their harm. However, they are required to provide clear and sufficient information or evidence to support the acts of corruption, bribery, violations of laws, rules and regulations, practices, or the Company's code of conduct.

2) Information related to complaints or whistleblowing, including the identity of the informant, is considered confidential and will only be disclosed as necessary, with consideration of safety and potential harm to the informant and any involved individuals. Individuals involved in handling complaints, conducting investigations, and overseeing each step must uphold strict confidentiality and refrain from sharing the information with others. Any breach of this confidentiality will be treated as a disciplinary violation.

3) The Company will not demote, punish, or take any negative action against employees who refuse to engage in corruption, even if such actions result in the Company losing business opportunities

4) Those who suffer harm or damage will receive appropriate and fair remedies through suitable methods or processes.

5) The Company may implement additional protective measures for whistleblowers, informants, or individuals who cooperate in investigations, as deemed appropriate if it is determined that there is a potential harm or safety concerns for these individuals as a result of their whistleblowing or reporting under the policy.

6) Employees who mistreat others, engage in discriminatory behavior or cause harm to individuals because they have filed complaints, provided information, or reported misconduct related to corruption, bribery, legal violations, or breaches of Company policies and ethics—including situations where the individual has taken legal action, testified, or cooperated with authorities—will be deemed to have committed a disciplinary offense and will face penalties. Furthermore, they may be subject to legal consequences if their actions violate the law.

## 8. Fact-Finding Procedure

- 1) During the investigation and fact-finding process, the individuals handling the complaint, including the internal audit and risk management departments, will serve as investigators. They will collect facts based on the complaint received. The investigators may ask employees to provide information or request relevant documents to assist in the fact-finding process.
- 2) If there is sufficient reason to believe that the person named in the complaint has committed the alleged offense, they will be notified of the charges and given the opportunity to defend themselves by presenting additional information or evidence to show their lack of involvement in the misconduct.
- 3) When a complaint leads to harm for any individual, suitable and fair measures will be suggested to rectify the damage and compensate the affected party.

## 9. Punishment

Since the Anti-Corruption Policy and Measures form a part of work discipline, directors, executives, and employees who violate them will be subjected to investigation and disciplinary action under the Company's regulations, as well as applicable charters and law, which may include dismissal from the Company.

The Company must not demote, punish, or negatively affect directors, executives, and employees who refuse to take part in corruption, even though such refusal could deprive the Company of business opportunities.

1. The Company has established processes for appropriately penalizing employees who do not adhere to the Anti-Corruption and Bribery Policy. Penalties may include termination if deemed necessary by the Company. Any actions that violate or deviate from this policy, whether directly or indirectly, will be subject to disciplinary measures as outlined in the Company's regulations or legal consequences.
2. Board committees that do not comply with the Anti-Corruption Policy appropriately will be subject to an investigation by the Company's board to determine the facts and consider appropriate penalties. Any punitive measures taken will be conducted with fairness and impartiality.
3. The Company's employees must comprehend and adhere to the Anti-Corruption Policy at every stage of their duties. Allegations of corruption and non-compliance can tarnish the Company's reputation and image, even though unfounded. In the event of any actions that

potential violate this policy, employees are required to report to their supervisors or the internal audit and risk management departments.

Anti-Corruption Policy 2026 Edition was approved by the Board of Directors Meeting No. 7/2025 on 14 November 2025 and shall be effective from 1 January 2026 onwards.

- Signed -

Mr. Norachit Sinhaseni

Chairman of the Board

Central Plaza Hotel Public Company Limited