



TOA Paint (Thailand) Public Company Limited

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Signed by	Mr. Veerasak Kositpaisal Acting Chairman of the Board of Directors	Responsible Dept.	Compliance

Anti-Bribery and Corruption Guideline

History of Revision

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ANTI-BRIBERY AND CORRUPTION GUIDELINE

TOA Paint (Thailand) Public Company Limited ("Company") is committed to conducting business under the principles of good corporate governance to create excellent performance and sustainable business growth. To demonstrate its commitment to combating bribery and corruption, the Company has established this Anti-Bribery and Corruption Guideline (the "Guideline") for the Board of Directors, directors, executives, and employees at all levels of the Company, as well as Business Contact, to collaborate in implementing the anti-bribery and corruption policy to appropriately combat bribery and corruption.

1. OBJECTIVES

The Company has established this Guideline to:

- Define operational procedures to serve as guidelines for Company Personnel and Business Contact to prevent, detect, and respond to bribery and corruption risks.
- Specify the duties and responsibilities of personnel in each position to clearly define responsibilities in preventing, detecting, and responding to bribery and corruption risks in accordance with best practices, thereby demonstrating commitment and promoting a culture of awareness regarding organizational bribery and corruption risks.
- Establish guidelines consistent with the Company's Anti-bribery and Corruption Policy to enable Company personnel to properly and timely prevent, detect, and respond to bribery and corruption in cases of suspicion or discovery of acts related to bribery and corruption.

2. SCOPE OF THE GUIDELINE

This Guideline covers the operations of the Company's Board of Directors, Executives, and personnel at all levels, including directors, executives, and employees at all levels of the Company ("Company Personnel"), as well as any persons such as agents, business partners, contractors, intermediaries, independent contractors, authorized representatives, consultants who act or operate on behalf of the Company, business partners, and stakeholders ("Business Contact").

This Guideline is part of the anti-bribery and corruption policy approved by the Board of Directors, establishing measures to prevent, detect, and respond to bribery and corruption, and can be used in conjunction with the Company's Business Code of Conduct and various policies as appropriate.

3. DEFINITIONS

"Corruption" means the misuse of authority for any action to obtain improper benefits for the organization, oneself, and/or others. Corruption includes demanding benefits or threatening, offering benefits, and conflicts of interest, whether with government officials and/or employees (both Thai government, foreign governments, and/or international organizations) or between private sectors, except where permitted by law, regulations, announcements, bylaws, local customs, or trade practices.

"Bribery" means offering, promising to give, giving, receiving, or soliciting any other benefit to induce the recipient of the bribe to act or refrain from acting in their official capacity for the benefit of the bribe giver, which is contrary to law and good governance principles. Such benefits may be in the form of money, gifts, loans, fees, rewards, or other benefits such as hospitality, donations, etc.

"Fraud" means intentional acts to seek improper benefits for oneself or others, such as family members, relatives, friends, or close associates. Fraud is broad and includes acts such as misappropriation of assets, fraudulent financial reporting, and corruption.

"Misappropriation of Assets" means any act that leads to improper possession of Company property or causes the Company to lose property, opportunities, or benefits with the intention of benefiting oneself and others, covering both cash and non-cash assets, such as false expense claims, theft of cash or assets, etc.

"Fraudulent Reporting" means modifying various reports, whether financial, such as financial records or accounting records, or non-financial reports, to conceal misappropriation of assets or inappropriate acts, or to benefit oneself and/or others, resulting in inaccurate Company reports.

"Facilitation Payments" means expenses paid to government officials unofficially, being payments exceeding legally prescribed rates (if any), even if in small amounts, to induce the performer to expedite action or to ensure that any action within their official duties will be carried out, such as requesting permits, certificates, and receiving public services, etc.

4. NON-TOLERANCE OF BRIBERY AND CORRUPTION

The Company will not tolerate any acts that may lead to bribery and corruption, even if such acts benefit the Company. To ensure that Company personnel do not tolerate bribery and corruption, all Company personnel must understand and comply with the anti-bribery and corruption policy, Business Code of Conduct, work practices, Anti-Bribery and Corruption Guideline, relevant procedural manuals, and other Company policies strictly without exception.

The Company commits to thoroughly and appropriately investigating all suspected cases of bribery and corruption, regardless of external factors, conducting investigations impartially and without bias. Furthermore, the Company will impose maximum disciplinary measures on violators, and if investigations reveal Company personnel who were aware of bribery and corruption incidents but failed to report them, the Company will consider disciplinary action against such personnel as well.

However, the Company will provide safety protection to whistleblowers and will provide fairness and protection to Company personnel who refuse acts constituting bribery and corruption or report bribery and corruption related to the Company. The Company will not punish or negatively affect Company personnel who refuse bribery and corruption.

5. DUTIES AND RESPONSIBILITIES

Company personnel must conduct themselves according to organizational values and the Code of Business Conduct strictly, as well as fully support policies, guidelines, and various regulations related to combating bribery and corruption, including this Guideline. This Guideline assigns additional responsibilities to certain authorized persons or executives, such as the Board of Directors, Corporate Governance and Sustainability Committee, Audit Committee, Chief Executive Officer, Internal Audit Division, Procurement Division, and Human Resources Division, to jointly combat bribery and corruption as follows:

5.1 Board of Directors

The Board of Directors is responsible for overseeing the overall combat against bribery and corruption, with the following main duties:

- Lead in demonstrating commitment to combating bribery and corruption to show the stance to business partners.
- Oversee the overall combat against bribery and corruption within the Company.
- Establish and approve policies related to combating bribery and corruption and ethics for Company personnel, as well as anti-bribery and corruption measures.
- Establish and assign duties and responsibilities in other processes related to anti-bribery and corruption measures to the Risk Management and Sustainability Committee to oversee compliance with policies related to combating bribery and corruption.
- Comply with policies and guidelines related to combating bribery and corruption.

5.2 The Risk Management and Sustainability Committee

The Risk Management and Sustainability Committee is responsible for overseeing compliance with policies related to corporate governance, which includes bribery and corruption, with the following main duties:

- Oversee compliance with the Company's anti-bribery and corruption policies.
- Establish and approve various guidelines related to combating bribery and corruption, propose guidelines with recommendations to the Board of Directors on corporate governance matters, including guidelines related to combating bribery and corruption, and review compliance with relevant policies and guidelines.
- Establish and assign duties and responsibilities in other processes related to anti-bribery and corruption measures, such as bribery and corruption risk management, whistleblowing, investigations, bribery and corruption risk assessment, etc., to relevant executives who have knowledge, ability, and qualifications to perform duties.
- Report compliance with anti-bribery and corruption policies and guidelines to the Board of Directors annually.
- Comply with policies and guidelines related to bribery and corruption.

5.3 Audit Committee

The Audit Committee is responsible for evaluating the adequacy and appropriateness of the anti-bribery and corruption system, detailed as follows:

- Review and approve the Internal Audit Division's audit plan to cover review of internal controls for operations according to anti-bribery and corruption measures and related policies, as well as bribery and corruption risks in other Company processes.
- Review to ensure that the whistleblowing process regarding bribery and corruption is appropriate and effective.
- Report quarterly to the Board of Directors on the status of managing incidents related to bribery and corruption.
- Consult with auditors in cases where the Company experiences significant bribery and corruption incidents.
- Comply with policies and guidelines related to combating bribery and corruption.

5.4 Chief Executive Officer

The Chief Executive Officer is responsible for designing and establishing procedures and internal control systems for combating bribery and corruption to prevent, detect, and respond to bribery and corruption risks that may occur in the Company. The duties of the Chief Executive Officer in detail are as follows:

- Support and create values for combating bribery and corruption throughout the Company.
- Provide appropriate and adequate procedures, operating manuals, and internal controls in processes under responsibility to prevent bribery and corruption.
- Assign supervision responsibilities for anti-bribery and corruption policies and guidelines to divisions, personnel, and working groups with knowledge, ability, and experience, and allocate sufficient time for these individuals to carry out assigned tasks.
- Comply with policies and guidelines related to combating bribery and corruption.

5.5 Corporate Governance Working Group

The duties of the Corporate Governance Working Group are as follows:

- Report and coordinate with the Corporate Governance and Sustainability Committee and Chief Executive Officer on combating bribery and corruption.

- Review policies, procedures, and processes related to combating bribery and corruption and managing bribery and corruption risks.
- Coordinate communication of anti-bribery and corruption requirements to Company personnel for acknowledgment.
- Monitor implementation of anti-bribery and corruption policies and guidelines by assigned divisions and report quarterly to the Corporate Governance and Sustainability Committee.
- Comply with policies and guidelines related to combating bribery and corruption.

5.6 Internal Audit Division

The duties of the Internal Audit Division:

- The Internal Audit Division audits and provides consulting on auditing, evaluating internal controls of anti-bribery and corruption measures.
- Review and verify the adequacy of internal control systems as well as efficiency and effectiveness in implementing anti-bribery and corruption policies and related guidelines.
- Evaluate internal control systems of each process to cover bribery and corruption risks and compliance with policies and related guidelines sufficiently and rigorously, with follow-up correction at root causes to prevent recurrence, especially high-risk issues or items that may cause fraud.
- Compile information from bribery and corruption whistleblowing and support the investigation committee by providing advice and sharing investigation information.
- Report internal audit results and report quarterly to the Audit Committee on the status of managing incidents related to bribery and corruption.
- Comply with policies and guidelines related to combating bribery and corruption.

5.7 Risk Management Division and Compliance Division

The duties of the Risk Management Division and Compliance Division in combating bribery and corruption are as follows:

- Coordinate and provide advice on operational processes or other matters related to combating bribery and corruption.
- Provide consulting to executives for assessing anti-bribery and corruption risks and compile risk assessment results to prepare organizational anti-bribery and corruption risk reports.

- Present information when there are issues related to organizational-level bribery and corruption risks or when new bribery and corruption risks emerge.
- Monitor that each division has adequate prevention of bribery and corruption and management of bribery and corruption risks, with follow-up correction at root causes to prevent recurrence, especially high-risk issues or items that may cause fraud.
- Comply with policies and guidelines related to combating bribery and corruption.

5.8 Human Resources Division

The duties of the Human Resources Division in combating bribery and corruption are as follows:

- Establish guidelines and channels for communication to instill awareness among Company personnel regarding combating bribery and corruption and ethics, including providing training to enhance personnel knowledge and abilities to have sufficient potential to prevent bribery and corruption in operations.
- Verify background and credibility regarding qualifications and abilities, including work history of personnel in important positions before signing employment contracts to ensure such persons have no issues regarding integrity in operations.
- Include terms and conditions regarding bribery and corruption as part of employee contracts.
- Include Code of Business Conduct, ethics, and combating bribery and corruption as one of the indicators for evaluating personnel performance.
- Conduct exit interviews when personnel resign, covering concerns about fraud in the Company that such personnel were concerned about or experienced during operations.
- Comply with policies and guidelines related to combating bribery and corruption.

5.9 Procurement Division

The duties of the Procurement Division in combating bribery and corruption are as follows:

- Inquire about background and conduct due diligence on business partners, Business Contact, and new business partners to verify credibility, financial status, reputation, and qualifications related to products or services of business stakeholders and business partners to ensure such persons implement appropriate anti-bribery and corruption measures.
- Establish processes for verifying and supervising transparency in transactions with business partners, Business Contact, new business partners, and Business Contact (Third Party Screening) to ensure such persons comply with anti-bribery and corruption measures.

- Communicate policies, guidelines, and regulations related to combating bribery and corruption to Business Contact or business partners with the Company.
- Comply with policies and guidelines related to combating bribery and corruption.

5.10 Company Personnel

All Company personnel are responsible for reporting bribery and corruption incidents or potential fraud to authorized persons. The duties of Company personnel in detail are as follows:

- Study the Company's various policies and regulations, such as anti-bribery and corruption policies and guidelines, bribery and corruption risk management, Company Code of Business Conduct, policies on giving and receiving gifts or other benefits.
- Clearly communicate Company policies, regulations, and guidelines related to combating bribery and corruption, bribery and corruption risk management, Company Code of Business Conduct, and policies on giving and receiving gifts or other benefits to Business Contact.
- Understand duties and responsibilities and manage bribery and corruption risks for oneself and perform duties as specified.
- Report irregularities, inappropriate behavior, or suspicious incidents of bribery and/or corruption through complaint channels or fraud and corruption whistleblowing channels designated by the Company.
- Cooperate by providing information to the investigation committee or when requested to assist in investigation processes.
- Monitor various risk factors, especially bribery and corruption, and timely present risk-related issues to supervisors.
- Comply with policies and guidelines related to combating bribery and corruption.

The Company considers it the duty of Company personnel at all levels, from general personnel to the Company's directors, to understand and comply with policies and regulations related to combating bribery and corruption as well as this Guideline without exception. Violation or non-compliance with such policies, guidelines, and regulations may result in disciplinary action.

6. MEASURES TO PREVENT BRIBERY AND CORRUPTION

Bribery and corruption risk assessment, establishment of policies related to combating bribery and corruption, designing and implementing appropriate internal controls to reduce bribery and corruption risks, and creating awareness and values for combating bribery and corruption among

Company personnel are important factors that can help the Company prevent fraud in the organization. Prevention measures consist of 5 main activities as follows:

6.1 Bribery and Corruption Risk Assessment

Bribery and corruption risk assessment aims to have all divisions in the Company proactively identify, assess, and review organizational bribery and corruption risks, as well as create awareness of fraud risks that may occur and impact organizational objectives and operations to ensure that bribery and corruption risks are identified and managed timely. However, executives of all divisions must cooperate in providing information on bribery and corruption risks that may occur in their divisions.

Bribery and corruption risk assessment consists of 3 main steps as follows:

- Preparation to establish criteria for measuring risks in terms of impact and likelihood of occurrence, as well as determining acceptable risk levels for the organization.
- Risk identification, identifying existing internal controls, assessing existing internal control systems, analyzing severity and likelihood of risks after current internal control measures.
- Finding measures to reduce risks to acceptable organizational levels if current internal control measures are insufficient to prevent bribery and corruption risks.

6.2 Establishing Policies Related to Combating Bribery and Corruption

The Company provides policies, criteria, and requirements, various operating regulations, such as anti-bribery and corruption policies and guidelines, policies on giving and receiving gifts or other benefits, Code of Business Conduct and work practices, etc., to enable Company personnel to understand good corporate governance principles, ethical principles, and good operational guidelines, as well as to create awareness and values in combating bribery and corruption.

Such policies, guidelines, and various operating regulations must be approved by the Board of Directors or persons assigned by the Board of Directors. Furthermore, the Corporate Governance Subcommittee must review and update policies, guidelines, and various related operating regulations at least annually to ensure that bribery and corruption risks are managed and changes are made in accordance with applicable regulations and laws. The Company must communicate and establish procedures for communicating policies, guidelines, and various related operating regulations to Company personnel and external parties, such as Business Contact and the public, with Company personnel at all levels having the duty to study and understand the content and strictly comply with such policies, guidelines, and various related operating regulations.

6.3 Communication and Training

Communication and training are essential in preventing bribery and corruption measures to create knowledge, understanding, and awareness of the importance of complying with policies, guidelines, and various operating regulations related to combating bribery and corruption to promote participation in organizational bribery and corruption risk management, as well as enabling Company personnel to be part of helping prevent and detect bribery and corruption in the organization, for Business Contact, other persons who have business transactions with the Company, or have interests with the Company, to demonstrate the Company's commitment to combating fraud and transparency in operations. The Company has procedures for communicating policies, criteria, and requirements, guidelines, and various related operating regulations, such as preparing annual written communication plans for anti-bribery and corruption policies and measures.

6.4 Background Screening of Personnel and Business Stakeholders

Background inquiry of personnel and business partners is an important factor that makes preventing bribery and corruption effective. The Company assigns the Human Resources Division to inquire about personnel background before employment or promotion, and the Procurement Division responsible for procurement to inquire about background of other personnel who will have business transactions with the Company before starting contracts or transactions between them. Such screening can be done appropriately under applicable laws and with consent from personnel or business partners.

6.5 Internal Control

Internal control is an operational process jointly established by the Board of Directors, executives, and Company personnel at all levels to provide reasonable assurance that methods or operations as specified will help the Company achieve its objectives. Therefore, internal control is a fundamental tool for the Company to prevent bribery and corruption in operational processes of all divisions. Executives in each division must design appropriate internal controls for processes under their responsibility to manage and reduce bribery and corruption risks jointly identified in bribery and corruption risk assessment to acceptable organizational levels, as well as communicate, understand, and monitor operations of division personnel to operate according to established internal control systems and monitor that each division has adequate prevention of bribery and

corruption and management of bribery and corruption risks, with follow-up correction at root causes to prevent recurrence, especially high-risk issues or items that may cause fraud.

The Company prepares written operational procedures or main operational processes to enable division executives to review and approve implementation, considering clear segregation of duties in defining personnel duties in implementing procedures or operational processes to make operations transparent, independent, and able to help prevent or detect bribery and corruption risks, as well as storing such documents in channels accessible to relevant personnel and communicating to relevant personnel for acknowledgment.

Furthermore, executives in each division should regularly review operational procedures or operational processes or when there are changes that significantly impact operations to ensure that operational procedures or operational processes are consistent with good internal control principles. The Company assigns the Internal Audit Division to evaluate the adequacy, appropriateness, efficiency, and effectiveness of organizational internal controls, providing recommendations and corrective guidelines to improve or develop internal controls to be efficient and effective, able to prevent and detect risks that may occur, especially bribery and corruption risks. The Internal Audit Division must discuss audit results with division executives being audited to understand and find appropriate and implementable improvement and development guidelines for internal controls, as well as regularly report audit results to the Audit Committee. Division executives are responsible for presenting recommendations for improvement and development from guidelines provided by the Internal Audit Division.

7. MEASURES TO DETECT BRIBERY AND CORRUPTION

Good prevention measures for bribery and corruption will assist the Company to reduce the likelihood of bribery and corruption to some extent. However, the Company needs to establish measures to detect bribery and corruption to help detect and report acts that may be bribery and/or corruption timely.

Therefore, whistleblowing mechanisms and fact-finding investigations are main activities that can help the Company detect bribery and corruption. Furthermore, to ensure that measures to detect bribery and corruption are appropriate, efficient, and effective, the Internal Audit Division must annually audit internal controls of such measures. Measures to detect bribery and corruption consist of 2 main activities as follows:

7.1 Whistleblowing Mechanism

The Company establishes reliable and independent channels for reporting bribery and corruption as specified in the Company's Whistle Blowing Policy, established as guidelines for Company employees and external parties to file complaints or report with measures to protect and provide fairness to complainants who are not discriminated against, retaliated against, or bullied through confidential reporting methods so that employees and external parties who witness or are concerned about misconduct, irregular behavior, or rights violations occurring within the Company Group or wish to propose various ideas to the Company Group can proceed with confidence and convenience.

The Company establishes complaint and fraud and corruption whistleblowing channels as follows:

Channel 1: Via E-Mail by sending to any of the following whistleblowing recipients:

Committee	E-Mail
Board of Directors	directors@toagroup.com
Audit Committee	auditcommittee@toagroup.com

Channel 2: By post, addressing the envelope to the Audit Committee (Internal Audit Division) followed by the address:

TOA Paint (Thailand) Public Company Limited 31/2 Moo 3, Bangna-Trad Road, Bang Sao Thong Subdistrict, Bang Sao Thong District, Samut Prakan Province 10570

Channel 3: Company Website at www.toagroup.com or <https://investor.toagroup.com/th/whistle-blowing>

7.2 Fact-Finding Investigation

When there is incident reporting or whistleblowing of bribery and corruption, the Internal Audit Division and/or relevant persons or divisions, or the investigation committee will verify facts and investigate as appropriate under the Company's Whistle Blowing Policy.

8. MEASURES TO RESPOND TO BRIBERY AND CORRUPTION

The Company establishes measures to respond to bribery and corruption to remedy impacts from fraud occurrence, as well as find methods to prevent bribery and corruption of the same type from occurring again. Measures to respond to bribery and corruption consist of investigation, punishment and corrective measures, reporting bribery and corruption, and disclosure with the following guidelines:

8.1 Investigation, Punishment, and Corrective Measures

Under the Whistle Blowing Policy, investigation of misconduct, fraud, and corruption must be conducted fairly and without any bias to ascertain facts or prove whether the accused has committed misconduct or fraud and corruption, and must protect the interests and reputation of the Company and the accused.

Relevant executives or division heads, or in cases where an investigation committee is appointed, are responsible for preliminarily evaluating and verifying received information, investigating facts together with relevant divisions, and may examine documents, email data, as well as any other Company data or data with which the Company is involved, and inquire with information providers, preparing summary reports within 30 working days from receiving the matter.

When investigating facts and verifying information and finding that received information has factual basis that there may be misconduct or fraud and corruption, relevant executives or division heads or the investigation committee shall propose to senior executives or authorized persons of the Company to impose disciplinary punishment or punishment according to Company Group regulations, and report investigation results to the Internal Audit Division within 7 working days from the date of punishment to record information and report action results to the Audit Committee and Board of Directors. In cases where damage occurs, notify the Executive Committee for acknowledgment.

Relevant executives or division heads will jointly establish with the Internal Audit Division procedures, methods, measures, or corrective plans, including providing adequate internal controls to monitor and prevent recurrence of misconduct in the future.

8.2 Reporting and Disclosure

Under the Whistle Blowing Policy, the Internal Audit Division must prepare investigation result reports for submission to the Chief Executive Officer and compile reports to summarize for quarterly presentation to the Audit Committee, as well as immediately report to the Chief Executive Officer in cases of urgency or severity requiring timely correction. Information in reports must be kept confidential, reporting only to authorized persons as specified, prohibiting information sharing in any form to divisions or unrelated persons.

Disclosure of information regarding actions related to anti-bribery and corruption measures, as well as decisions to disclose information related to various bribery and corruption matters, the Internal

Audit Division will report only to the extent required by law, including disclosure to regulatory agencies such as the Securities and Exchange Commission and the Stock Exchange of Thailand by assignment from the Company's senior executives or Audit Committee.

9. REVIEW AND IMPROVEMENT OF ANTI-BRIBERY AND CORRUPTION GUIDELINE

This Anti-Bribery and Corruption Guideline will be reviewed and improved annually or when there are significant changes affecting bribery and corruption risk management to ensure that such guidelines are consistent with Company policies and comply with applicable regulations and laws. Improvement of the Anti-Bribery and Corruption Guideline must be considered and approved by the Board of Directors and the improved guidelines must be communicated throughout the Company.

Any acts violating this Anti-Bribery and Corruption Guideline must receive disciplinary punishment according to Company regulations, including termination if the Company deems necessary. Furthermore, violators of this Guideline may receive legal punishment if proven that such acts violate the law.

This Anti-Bribery and Corruption Guideline was approved by Board of Directors resolution on on October 15, 2025, and is effective from October 15, 2025 onwards.

TOA Paint (Thailand) Public Company Limited

Mr. Veerasak Kositpaisal

(Acting Chairman of the Board)

Date: October 15, 2025