

2026

Anti-Corruption Policy

PACIFIC PIPE PUBLIC COMPANY LIMITED

The Board of Directors	
No. 1	12 November 2018
No. 2	10 May 2019
No. 3	13 May 2020
No. 4	11 May 2021
No. 5	12 May 2022
No. 6	22 December 2022
No. 7	20 December 2023
No. 8	20 December 2024
No. 9	16 December 2025

Note: Approved by the resolution of the Board of Directors' Meeting No. 6/2025, held on 16 December 2025, Agenda Item 4.3.

Anti-Corruption Policy

The Company strictly prohibits directors, executives, and employees of the Company and its subsidiaries (if any) from engaging in or accepting corruption in any form. Such acts include the abuse of authority for direct or indirect personal benefit to oneself, family members, friends, or associates, whether as a giver or a receiver, and whether in monetary or non-monetary forms, in dealings with government agencies or private sector entities with which the Company conducts business or has contact. This includes, but is not limited to, the acceptance or provision of gifts, presents, hospitality, donations, solicitations, or any other benefits from or to any person or entity doing business with the Company. The Company requires strict compliance with its anti-corruption policy at all times.

Furthermore, the Company has a policy of not demoting, penalizing, or taking any adverse action against employees who refuse to engage in corruption, even if such refusal results in the loss of business opportunities for the Company.

Definitions

Corruption means any act or omission in the performance of duties, or the abuse of authority in one's position in any form, whether directly or indirectly, including the giving or receiving of bribes; the offering or promising to give; the requesting or demanding of property, money, goods, rights, or any other benefits, which are contrary to morality, ethics, and applicable laws, rules, regulations, or policies, to government officials or any other persons doing business with the Company, in order to obtain or retain any improper benefits for the organization, oneself, or related persons. This shall exclude cases where such actions are permitted by law, rules, notifications, regulations, local customs or traditions, or accepted commercial practices.

Bribe means the giving or receiving of property or any other benefits to induce a person to perform, refrain from performing, or delay the performance of any act that is contrary to his or her duties.

Political Contribution means any assistance, whether financial or in other forms, provided to support political activities. Financial assistance may include loans. Other forms of assistance include the provision of goods or services, advertising, promotion or support of political parties, the purchase of tickets to events organized for fundraising purposes, or donations to organizations closely associated with political parties. In this regard, allowing employees to take unpaid leave from the employer, or acting as a representative of the Company in political campaigns or activities, shall also be considered political contributions.

Gift means money or items that can be exchanged for cash, such as gift cards, vouchers, gift cheques, or other items or benefits given between the Company and persons dealing with the

Company in accordance with goodwill, customs, traditions, or social etiquette, such as gifts or presents.

Facilitation Payment means the payment of money or the provision of any property to government officials in order to expedite or facilitate the performance of governmental duties or services to which the payer is legally entitled.

Roles and Responsibilities

1. The Nomination, Remuneration and Corporate Governance Committee shall propose the Anti-Corruption Policy to the Board of Directors for consideration.
2. The Board of Directors shall be responsible for considering and approving the Anti-Corruption Policy and assigning management to implement anti-corruption measures for employees' compliance, as well as overseeing the establishment of systems that effectively support anti-corruption efforts, in order to ensure that all employees of the Company understand and recognize the importance of issues arising from corruption.
3. The Executive and Risk Management Committee shall be responsible for assessing the likelihood of corruption risks and proposing the assessment to the Board of Directors for use as guidelines for the Internal Audit function in audit planning and monitoring.
4. The Audit Committee shall have the following duties and responsibilities:
 - 4.1 To review reports on internal control system audits and corruption risk assessments as proposed by the Internal Audit function, in order to ensure that such systems minimize the risk of corruption that may impact the Company's financial position and operating results, and that they are appropriate to the Company's business operations.
 - 4.2 To report the results of the review of internal control system audit reports and corruption risk assessments to the Board of Directors.
5. The Internal Audit Function shall have the following duties and responsibilities:
 - 5.1 To perform duties in accordance with the established internal audit plan and submit reports on internal control system audits and corruption risk assessments arising from such audits to the Audit Committee for acknowledgement.
 - 5.2 To perform assignments as delegated by the Audit Committee relating to corruption investigations involving the organization outside the established internal audit plan.
6. Management shall be responsible for establishing systems to promote and support anti-corruption practices, communicating such systems to employees and relevant parties, and reviewing the appropriateness of such systems and measures to ensure alignment with changes in the Company's business operations and legal requirements.
7. Directors, executives, and all employees shall strictly comply with and support the Anti-Corruption Policy and shall not be involved in corruption in any manner, whether directly or indirectly. In cases where employees have doubts or become aware of any violations of this Policy, they must report to their supervisors or through the reporting channels in accordance with the Company's complaint handling and whistleblowing policy.

Good Practices

1. No giving or receiving of bribes, money, compensation, or benefits of any kind that may constitute or lead to corruption.
2. No actions shall be taken, nor involvement entered into, in any illegal business activities.
3. In cases of procurement or hiring of services, the processes shall be carried out in accordance with the Company's regulations, with transparency and verifiability.
4. In entering into agreements with business partners, employees must avoid giving or accepting any items in connection with contract negotiations or contract performance. Any gifts that may be given or accepted must strictly comply with the Company's relevant policies and procedures.
5. Employees of the Company are prohibited from attempting to exert improper influence over business partners or competitors in violation of laws and ethical standards, whether through special favors, the giving or receiving of gifts and hospitality, or the provision of any other benefits.
6. The Company conducts its business with political neutrality and does not provide political contributions or political support to political parties or politicians in any form. The Company does not encourage directors, executives, or employees to participate in any political activities on behalf of the Company. Nevertheless, participation in political activities is considered an individual right and freedom under the law; however, directors, executives, and employees must not misrepresent themselves as acting on behalf of the Company, nor use any Company assets to support political activities, or engage in any acts that may cause misunderstanding that the Company is involved in or supports any political activities. Any political expression or political opinions expressed within the Company's premises shall be deemed a violation of the Company's regulations.
7. In cases of hiring government officials or former government officials, the Company shall conduct recruitment, approval, remuneration determination, and supervision of performance in a stringent manner. Such employment must be transparent, verifiable, not contrary to applicable laws or anti-corruption practices, and must not serve as a channel for providing improper business advantages.
8. Charitable donations and financial support to organizations must be carried out with transparency, in compliance with morality, ethics, and applicable laws, and in strict accordance with the Company's relevant policies and procedures. Such donations and financial support must not create conflicts of interest, whether personal or corporate, and must not be used as a pretext for corruption.
9. Directors and executives must recognize the importance of communication, education, and advisory support to subordinates to build understanding of anti-corruption practices, in order to ensure employees' compliance with this Anti-Corruption Policy, and must serve as good role models in integrity, ethics, and codes of conduct.

Measures / Implementation

The Company aims to foster awareness of anti-corruption, anti-bribery, and the prevention of giving or receiving bribes through internal communication within the Company, in order to ensure that directors, executives, and employees understand and recognize the importance of anti-corruption, anti-bribery, and the prevention of giving or receiving bribes, as well as the relevant policies and practices. Such communication shall be carried out through employee meetings, training programs, seminars, and the Company's communication media. In addition, employees whose duties involve dealings with the Company's stakeholders shall inform such stakeholders through appropriate communication channels.

Disclosure of the Anti-Corruption Policy

The Company complies with the laws of Thailand relating to anti-corruption and, in order to ensure that both internal and external parties are aware of the Anti-Corruption Policy, the Company shall undertake the following actions:

1. The Company shall post the Anti-Corruption Policy on notice boards at all Company premises.
2. The Company shall disclose the Anti-Corruption Policy through the Company's communication channels, such as the intranet and the Company's website.
3. The Company shall arrange training on the Anti-Corruption Policy for employees.

Complaint Policy and Whistleblowing Guidelines

Scope of Complaints and Whistleblowing

In cases where there is suspicion or observation of acts that violate good practices in the following matters:

- Non-compliance with the principles and guidelines of the Company's Corporate Governance Policy
- Violations of the Company's rules, regulations, or internal policies
- Unfair treatment in the performance of duties
- Acts that constitute corruption, bribery, or the giving or receiving of bribes

or any acts that give rise to suspicion and cause damage to the organization, employees should make inquiries or consult with their supervisors whom they trust at any level. If employees are not comfortable or are uncertain about doing so, they may report the matter directly in accordance with the details specified in the section on Reporting Channels.

Reporting Channels

Employees may submit complaints or whistleblowing reports through the following channels:

1. Submitting reports via the suggestion boxes located at each factory and distribution center of the Company.
2. Contacting / reporting to the responsible persons as follows:
 - 2.1 Dr. Somchai Harnhirun: Chairman of the Audit Committee

E-mail: harnhirun@yahoo.com

2.2 Mr. Kriengkrai Rukkulchon:

Chairman of the Nomination, Remuneration and Corporate Governance Committee

E-mail: kriengkrairukk@gmail.com

The Company provides opportunities for all stakeholder groups to submit complaints when there are complaints or whistleblowing reports regarding operations that are inconsistent with the Company's Corporate Governance Policy and/or its ethics and code of conduct, as well as to raise inquiries or provide suggestions. Such matters may be reported through the following complaint channels:

- Sending an e-mail directly to the responsible persons, as listed in items 2.1–2.2;
- Submitting reports by post to:

Nomination, Remuneration and Corporate Governance Committee
Pacific Pipe Public Company Limited
1168/74, 26th Floor, Lumpini Tower
Rama IV Road, Thung Maha Mek Sub-district, Sathon District
Bangkok 10120 Thailand

Process upon Receipt of Complaints

1. Fact Gathering

The complaint recipient shall collect the relevant facts and submit the matter to the screening committee for each case.

2. Data Screening and Investigation

The screening committee shall invite representatives to participate in the screening of information and investigation within seven (7) days. The representatives participating in the consideration are as follows:

CASE A : Complaints concerning major shareholders
<u>Investigator:</u> Audit Committee
CASE B : Complaints concerning the Chief Executive Officer
<u>Investigator:</u> Nomination, Remuneration and Corporate Governance Committee
CASE C : Complaints other than Case A and Case B
<u>Investigator:</u> Chief Executive Officer

3. Determination of Corrective Measures

The screening committee shall summarize the findings and submit reports on actions taken in response to complaints and whistleblowing reports as follows:

CASE A: Summary report to be submitted to the Board of Directors

CASE B: Summary report to be submitted to the Board of Directors

CASE C: Summary report to be submitted to the Executive and Risk Management Committee

Reporting of Actions Taken and Review

The screening committee shall report all actions taken to senior management of the Company and the Board of Directors for acknowledgement.

In the event that any provision of the Corporate Governance Policy is repealed, such repeal must be approved by the Board of Directors and the repealed provision shall be disclosed immediately as required by law.

Measures for the Protection of Whistleblowers or Complainants

1. The Company shall keep information and the identities of whistleblowers, complainants, and respondents confidential.
2. The Company shall disclose information only to the extent necessary, taking into consideration the safety and potential damage to the reporter, the source of information, or related persons.
3. Persons who suffer damage shall be provided with appropriate and fair remedial measures.
4. The Company shall not take any unfair action against whistleblowers or complainants.

Disciplinary Actions

Disciplinary actions for misconduct shall be taken in accordance with the Company's regulations and/or applicable laws.

Policy Review Frequency

Annually, or when there are material changes.

.....(*Signed*).....

(Mr.Kriengkrai Rukkulchon)

Chairman of the Board and Chairman of the Nomination, Remuneration and Corporate Governance Committee

Complaint and Whistleblowing Form

Date Month Year

To

I, Position

Department (Unit): Division:

Immediate Supervisor:

I would like to submit a complaint and/or provide a whistleblowing report as follows:

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I hereby attach supporting documents or evidence (if any) for consideration, as follows:

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This is therefore submitted for your consideration.

Yours sincerely,

Signature: Complainant
(.....)