

ZEN Corporation Group Public Company Limited and its subsidiaries.

(Translation)

Anti-Corruption Policy

1. Principle

Zen Corporation Group Public Company Limited (the "**Company**") and its subsidiaries have an anti-corruption policy that focuses on promoting morality, ethics, and transparency in business operations in accordance with the Company's Code of Conduct. It can be a good role model to develop the organization towards sustainable success.

2. Definition

Corruption refers to the practice or omission of performance in office or abuse of power in any form, whether it is giving or accepting bribes. Presenting or making a commitment to give, solicit or make demands, whether property, money, goods, rights or any other benefits that are contrary to morals, ethics and laws, rules, regulations, policies, to government officials or any other person conducting business with the Company, its subsidiaries or group companies, whether domestic or foreign, in order to obtain undue benefits to the organization, itself or related persons.

3. Policy

Director, executives, employees and workers of the Company and its subsidiaries shall perform the following actions:

- 1) Fight against corruption in all cases.
- 2) Committed to be a transparent organization free from corruption.
- 3) Encourage those involved to cooperate in ways that will be beneficial in the fight against corruption.
- 4) Promote values related to morality and ethics.

4. Responsibilities

- 4.1 The Board of Directors has the duty and responsibility to formulate policies and supervise the establishment of an effective anti-corruption support system. To ensure that the management is aware of and attaches importance to anti-corruption and instills it into an organizational culture.
- 4.2 Audit and Governance Committee Have the duties and responsibilities to review the financial reporting system and accounting. Internal control system, internal audit system, and risk management system to ensure appropriate, rigor, modern, and efficient.
- 4.3 The Risk Management Committee has the duties and responsibilities to formulate all relevant risk management policies of the organization. This includes the risk of corruption.
- 4.4 Chief Executive Officer and Executives has the duty and responsibility to establish a system and promote and support anti-corruption policies to communicate to employees, workers and all related parties, as well as review the appropriateness of systems and measures to be in line with business changes, rules, regulations and legal requirements.
- 4.5 The Board of Directors, executives, employees and workers of the Company have the duty and responsibility to strictly implement and support the anti-corruption policy, including whistleblowing or providing information in order to achieve such policies.
- 4.6 Director of the Internal Audit department has the duties and responsibilities to audit and review that the operation is correct and in accordance with the policy, guidelines and authority to Implement procedures to ensure that there is an appropriate and adequate control system for potential corruption risks, as well as to review the guidelines to be in line with the policy, procedures, requirements, regulations, notices, laws, and business changes by reporting the audit results to the Audit and Governance Committee.

5. Guidelines

- 5.1 The Company's and its subsidiaries' directors, executives, employees, and workers will strictly comply with anti-corruption measures and will not commit or support corruption in any case.
- 5.2 Directors, executives, employees and workers of the Company and its subsidiaries shall not neglect or ignore when they see acts that fall under the category of corruption related to the Company and its subsidiaries. They must notify their superiors or agencies/persons designated to be responsible for their duties, as well as cooperate in investigating various facts. If you have any questions or concerns, please consult your supervisor or the agency/person designated to perform your duties or through internal communication channels.

- 5.3 The Company will provide fairness and protection, not to demote, punish or adversely affect employees and employees who refuse to commit corruption. Although the rejection caused the Company and its subsidiaries to lose business opportunities.
- 5.4 The Company will protect persons who deny corruption or report corruption related to the Company and its subsidiaries by taking measures to protect complainants or those who cooperate in reporting corruption as stipulated in the Company's policy on complaints and whistleblowing.
- 5.5 The Company will disseminate, educate, and understand third parties with business relationships with the Company and its subsidiaries. In matters that must be implemented in accordance with the anti-corruption policy.
- 5.6 The Company communicates anti-corruption measures, including reporting channels or complaints to individuals within the Company and its subsidiaries. Through various methods, such as orientation courses. The Company's seminars and trainings, including information notification through the e-mail system, etc., to seriously implement measures to ensure that the personnel of the Company and its subsidiaries Understanding. Approve and comply with anti-corruption policies and measures.
- 5.7 The Company communicates anti-corruption measures, including reporting channels for whistleblowing or complaints to the public. Subsidiaries, business representatives, related business partners, and stakeholders through various communication channels such as the Company's website, annual report, etc., to build understanding and implement measures seriously.
- 5.8 Employees and workers of the Company and its subsidiaries must sign an acknowledgment of the Anti-Corruption Policy to confirm that all employees and employees are acknowledged, understand and are ready to apply the principles of the policy as principles of operation in a strict manner throughout the organization.
- 5.9 The Company and its subsidiaries have established regulations for disbursement by setting a table of approval authority and approval limits. This is to prevent improper practices, including political support, and to ensure that charitable donations are not for corruption, and that business grants are not used as an excuse for corruption.
- 5.10 The Board of Directors, executives, officers and employees of the Company and its subsidiaries shall not accept or give gifts, banquets and any other expenses that are unnecessary and inappropriate to government officials or persons doing business with the Company. If a gift of unusually high value is received on a traditional occasion, the directors shall Executives, employees and employees refuse and do not accept such gifts and must report to their respective superiors for information.

- 5.11 The Company has established an audit process and internal control system to prevent corruption. marketing Procurement, Human Resource Management, Finance, Accounting Keeping records This includes other internal processes related to anti-corruption measures. The internal audit process must be carried out regularly.
- 5.12 The Company has established a human resource management process that reflects the Company's commitment to anti-corruption measures from selection, training, and performance evaluation, remuneration and promotion.
- 5.13 The company has put in place risk management measures to prevent corruption. It identifies incidents with a high risk of corruption that may occur in business operations. Assess the level of risk, both the likelihood of occurrence and impact, and monitor the progress of risk management to prevent corruption on a regular basis.
- 5.14 The Company conducts internal audits to ensure that the established risk management system helps the Company achieve its objectives as well as monitoring the company's internal operations to ensure compliance with regulations, rules and laws.
- 5.15 The Company has documented these measures in accordance with the principles of internal control to comply with the Company's policies and regulations.
- 5.16 The Internal Audit Department has set an annual meeting agenda for the Chief Executive Officer to report on the results of the audit in accordance with anti-corruption measures. to the Audit and Governance Committee and to the Board of Directors.
- 5.17 Directors, executives, employees and workers of the Company and its subsidiaries must act with caution to clarify the implementation of matters that are at high risk of corruption in the following matters:

5.17.1 Guidelines on Political Assistance

Political assistance refers to the provision of support to politicians or political parties, whether monetary or non-monetary. Non-monetary support includes lending or donating equipment. Providing technology services free of charge, including advertising, promoting or supporting political parties, and/or encouraging employees to participate in political activities on behalf of the Company in order to gain commercial advantage.

The Company has the following guidelines regarding political assistance:

- The Company and its subsidiaries conduct business in a politically neutral manner and will not support or act in a political manner or with politicians or any political party.
- The Company and its subsidiaries do not provide financial or material support to political parties, Politician or any political candidate for political assistance within the meaning of the definition of political assistance. The purpose is to benefit the business of the Company and its subsidiaries.
- Directors, executives, employees and workers have the right to freedom to participate in political activities under the provisions of the Constitution, but they must not claim to be directors or use any assets, equipment, or tools of the Company and its subsidiaries for the benefit of any political action. If participating, they must be careful not to take any action that will create an understanding that the company is not politically neutral.
- The Company and its subsidiaries notify the management, employees and workers acknowledge that the Company and its subsidiaries will not participate in or assist in political activities.

5.17.2 Guidelines on charitable donations and grants

Donation means charitable donation and donation for the public interest.

- 1) Charitable donations in the form of financial assistance or other forms such as education or giving away time, etc. The company can do so as part of social giving activities. However, the guidelines on charitable donations and grants must be strictly followed.
- 2) Donations for the public benefit are the use of money for projects and activities to benefit the community, society, and people.

Sponsorship means the provision of support, money or goods, valuables, or any other benefits that are paid to or received from business partners, customers, associations, foundations, charitable organizations, or non-profit organizations for the purpose of publicity, promotion, and reputation. Build business credibility and/or strengthen relationships as appropriate.

Grants for business publicity and to enhance the good image of the Company and its subsidiaries may be made for the purpose of business, brand, or reputation of the Company and its subsidiaries, but may be risky because they are payments for services or benefits that are difficult to measure and track.

Charitable donations and sponsorships expose the Company and its subsidiaries to the risk of corruption because such activities involve the spending of money without tangible returns, and may be used as an excuse or channel for corruption. Therefore, prudent action must be taken to ensure that

charitable donations and grants are transparent and in accordance with applicable laws and regulations, as well as the Articles of Association of the Company and its subsidiaries.

However, The Company has guidelines on this matter. as follows

- 1) Directors, executives, employees and workers of the Company and its subsidiaries who wish to participate in charitable donations or sponsorships must complete an application for approval of charitable donations or sponsorships. The name of the donor and/or sponsor and the purpose of the donation or support shall be attached, and the supporting documents shall be submitted for approval from the Company and its subsidiaries.
- 2) Persons who wish to have the Company and its subsidiaries participate in charitable donations or sponsorships are responsible for checking charitable organizations, foundations, companies, and stores in which the Company will participate in donations or sponsorships before presenting for approval as follows:
 - Ensure that charitable donations and donations are not used as a means of circumventing bribery, and must be conducted in a transparent manner and in accordance with applicable laws.
 - It must be proven that the activities under the charity project are actually organized and that the actions are taken to support the achievement of the project's objectives and bring real benefits to society, or to meet the objectives of the operation with social responsibility.
 - It must be proven that the activity is for charity. It has nothing to do with the benefits of giving back to any person or agency, except Declaration of Honor in accordance with General Practices.
- 3) If the Company and its subsidiaries detect or receive information from the authorities that organizations, foundations, companies, and stores that the Company donates or supports, the Company shall not be able to provide any information to the Company. There is corruption. The Company and its subsidiaries will suspend donations or support for activities in such organization or company as soon as they become aware of it.
- 4) Monitoring and reviewing to ensure that charitable donations or the use of grants are not committed for corruption are part of the internal audit process.

5.17.3 Guidelines for Actions Regarding Gifts Hospitality and other expenses

Actions related to gifts, hospitality services, and other inappropriate expenses may bring the risk of corruption. Executives, employees and employees of the Company and its subsidiaries to bribe In addition, the Company and its subsidiaries give gifts. Hospitality or other inappropriate charges to customers may be a violation of some customer policies. As a result, the company and its subsidiaries have to lose business opportunities.

The Company and its subsidiaries recognize the importance of building good relationships with business partners in order to bring about the continued success of the Company and its subsidiaries, and at the same time to maintain the reputation of the Company and its subsidiaries, which conduct business with integrity and lawfulness.

However, The Company and its subsidiaries have guidelines for conducting gifts Hospitality and other expenses are as follows:

- 1) Directors, executives, employees, and workers can receive gift, hospitality services, or other expenses such as hospitality or reception from other persons, etc., can be received/given on various customary occasions. Such receiving/giving must not create any advantage through inappropriate actions or explicit or covert exchanges to obtain assistance or benefits in return. This causes consent to compromise in inappropriate business agreements. It affects business decisions and must comply with relevant laws. However, In giving gifts from the Company, they must be given in the name of the Company, not in the name of a person, and may be made as a gift with the Company's logo that is appropriate to the situation, such as giving gifts during the New Year, Chinese New Year, or Songkran Festival, etc., and must not be in the form of cash or cash equivalents such as checks, gift cards, or gift vouchers, etc.
- 2) Directors, executives, employees, and workers of the Company and its subsidiaries must not claim or accept gifts. In any case, it may affect the decision to perform its duties with bias or embarrassment, or conflict of interest.
- 3) Directors, executives, employees, and workers of the Company and its subsidiaries must not accept any gifts or remuneration that is unreasonable due to the performance of their duties in the ordinary course of their duties, such as in the tender process, they must not accept gifts or welcome fees from the Company and its subsidiaries participating in the tender or related companies, etc.

- i. However, the Executives, employees and workers of the Company and its subsidiaries may receive gifts and/or welcome fees and/or other expenses if they comply with festivals or customs, which are usually valued not more than those stipulated in the Company's Code of Conduct, such as calendars, pens, notebooks, etc. The gifts that can be received must not be cash or cash equivalent, such as gift vouchers, gift cards, etc.
- 4) If you are in a situation where it is impossible to refuse to receive such gifts or benefits at that time, such as in a meeting with customers, etc. The recipient may receive the gift or benefit first, which must be immediately notified to the supervisor at the level of the director of the department and above. However, The Company and its subsidiaries will consider sending the items/gifts received to donate to the public charity as appropriate.
- 5) Giving and receiving other benefits, such as a social gathering, must confirm that the certification is not in the nature of spending an unreasonable amount of money or doing it frequently, so as to create an obligation on the person who organizes the social gathering. Whether directly or indirectly.
- 6) The Company and its subsidiaries will publicize to the directors, administrator, employees and workers of the Company and its subsidiaries are aware of the Guidelines for gifting. The Company and its subsidiaries shall provide hospitality services and other expenses through annual meetings or through other communication systems available to the Company and its subsidiaries.

5.17.4 Guidelines on the employment of government employees are as follows:

- A. Government employee means a person who holds political office, Civil servants or local government employees who have a regular position or salary, Employees or individuals working in state enterprises or government agencies, Local executives and local council members who are not political office holders, Officials under the Law on Local Governance Characteristics include directors, directors, Sub-committee Employees of government departments, state enterprises or government agencies, and individuals or groups of persons who exercise or are assigned to exercise the administrative power of the state in any of the actions taken in accordance with the law, whether they are established in the bureaucracy, the government or the government of the country, State Enterprises or Other State Enterprises Employment of government employees.
- B. Hiring government employees

Companies and subsidiaries are prohibited from hiring government employees to work that cause conflicts of interest.

5.17.5 Guidelines for Facility Payment

- A. Facilitation fee refers to a small amount of money paid to a public employee informally and is given only to ensure that the public employee will carry out the process or to encourage faster processing. The process does not require the discretion of the government employee and is a legitimate act of the government employee, as well as a right that the juristic person should have according to the law.
- B. Prohibition of directors, Executives and employees of the Company and its subsidiaries shall pay the facilitation fee to government employees in all cases.

5.17.6 The Company and its subsidiaries will publicize or notify customers, business partners or persons related to the business of the Company and its subsidiaries' policies and guidelines for the practice of gifts Hospitality and other expenses of the Company and its subsidiaries through documents and websites of the Company and its subsidiaries.

6. Consideration of penalties for violations or non-compliance

- 6.1 If the Company's directors violate or fail to comply with the Anti-Corruption Policy, they will be punished. The Company will set up an investigation committee to conduct a fact-finding investigation into such actions without delay. However, The Investigation Committee shall consist of all independent directors of the Company. In the event that the investigation of the facts is considered at any time. There are directors who violate or do not comply with this policy as independent directors. The independent director is prohibited from becoming an investigation committee at that time. In case it is proven that the directors have violated or not complied with the policy, the Investigation Committee shall consider the penalty based on the evidence of facts. and the environmental situation as appropriate in each case, and report the results of the investigation including the consideration of penalties to the Board of Directors (without directors who violate or do not comply with the policy attending the meeting). Further consideration. However, if the violation or non-compliance with the policy is an illegal act, the punishment shall also be imposed as prescribed by law.

- 6.2 If the Company's executives, employees and workers violate or fail to comply with this policy, disciplinary action will be imposed. If the violation or non-compliance with the policy is an illegal act, the punishment shall also be imposed according to the law.
- 6.3 The Company will use all internal communication systems to publicize penalties for non-compliance with anti-corruption measures, including creating a clear awareness of the policy of zero negative consequences for employees and employees who refuse to commit corruption. Although such a refusal will cause the company to lose business opportunities.
- 6.4 The Company has created awareness among employees and general workers to compliance with the anti-corruption policy of one or more employees and workers, such as commendation or awards, etc.

7. Whistleblowing or Complaints

The Board of Directors shall take measures to report whistleblowing or complaints of illegal acts, Code of Conduct, or behavior that may imply corruption or misconduct of individuals in the organization, including employees, workers, and other stakeholders. Such actions include inaccurate financial reports or defective internal control systems, and the Company must have a mechanism to protect whistleblowers or whistleblowers so that stakeholders can participate in monitoring the Company's interests more effectively.

Matters that receive whistleblowing or complaints

- Unlawful, corrupt, irregular or unethical acts of directors Employees and employees
- irregularities in financial reporting; Defective internal control system.
- Matters that affect the interests or reputation of the Company.

Whistleblowing or complaint channels

The Board of Directors provides an opportunity for stakeholders to communicate with the Audit and Governance Committee or the Internal Audit Department, and will protect the rights of stakeholders who report whistleblowing or complaining about issues through communication channels through the Audit and Governance Committee and the Internal Audit Department to carry out the procedures set by the Company and report to the Board of Directors. The contact channels are as follows:

- 1) Via email from the Audit and Governance Committee at auditcom@zengroup.co.th
- 2) Via the internal audit department's email at internalaudit@zengroup.co.th
- 3) Via email of the Corporate Secretary a corporatesecretary@zengroup.co.th
- 4) By letter to the Audit and Governance Committee, Internal Audit Department or Corporate Secretary

- 5) In the event that the complainant chooses not to disclose his or her name. The complainant must provide sufficient details of facts or evidence to show that there are reasonable grounds to believe that there has been fraud or obstruction of interest, or that the act violates any law, regulation, or article of the Company or its subsidiaries, or is unethical in the conduct of the business of the Company or its subsidiaries.

Complaints are considered to be of the utmost confidentiality, and complainants can make complaints through more than one channel and do not need to reveal the identity of the complainant. However, if the complainant discloses himself/herself, the Company will be able to notify the Company of the results of the action or additional details of the complaint.

Whistleblower Protection Mechanism

1. The complainant may choose not to disclose himself if he or she considers that disclosure may cause damage to him/herself, but must provide sufficient details of facts or evidence to show that there are reasonable grounds to believe that there is fraud or obstruction of interest, or that the act violates the law, rules, articles of association of the Company or its subsidiaries, and the Code of Conduct for the conduct of business of the Company or its subsidiaries.
2. Related Information: The Company will treat the confidentiality and disclosure as necessary, taking into account the safety and damage of the complainant. Sources of information or related persons. The person responsible for all steps must keep the information they know in the highest level of confidentiality and not disclose it to any other person. If violated, it is considered a disciplinary offense.
3. In case the complainant considers that he or she may not be safe or may suffer damage. The complainant may request the Company to establish appropriate protection measures, or the Company may establish protection measures without the complainant's request. If it is considered that it is likely to cause damage or unsafety.
4. Those who suffer damage will be mitigated by appropriate and fair methods or processes.

8. Implementation of measures by the Company and related persons

- 8.1 The Company will notify and support its subsidiaries to implement anti-corruption measures.
- 8.2 Employees and workers are prohibited from hiring any agents or business intermediaries for the purpose of committing corruption.

- 8.3 The Company and its subsidiaries will arrange procurement in a fair and transparent manner, as well as conduct evaluation to select vendors, service providers, including contractors, strictly follow procurement regulations. The Company will notify the sellers, service providers, and contractors to acknowledge the Company's anti-corruption policies and measures.
- 8.4 The Company and its subsidiaries reserve the right to cancel the procurement and employment if it is found that the seller, service provider, and contractor have committed fraudulent or bribery practices.

9. Policy Publishing

- 9.1 The Company and its subsidiaries will post anti-corruption policy announcements in prominent places for everyone in the organization to know.
- 9.2 The Company and its subsidiaries will disseminate the anti-corruption policy through communication channels of the Company and its subsidiaries, such as the websites of the Company and its subsidiaries or pamphlets, etc., to inform the public through various methods such as orientation courses for directors and employees in order to seriously implement the measures, and to ensure that the Company has sufficient resources and skilled personnel to implement the measures.

10. Risk Assessment Guidelines

- 10.1 Risk assessments allow companies to identify jobs that are at risk due to corruption, possible consequences, measures to be practice, method to measure success and the resources required to mitigate risk.
- 10.2 The Risk Management Committee will regularly assess the risk of potential corruption and review the risk management measures in place to ensure that they are appropriate to prevent risks at an acceptable level.

11. Internal control and reporting

- 11.1 The Company has an internal control system to ensure that the Company's operations are appropriate and efficient, as well as in accordance with relevant laws and regulations, and to reduce the risk of corruption.
- 11.2 The Company requires the Internal Audit Department to prepare an audit plan at least once a year , which will be approved by the Audit and Governance Committee.

- 11.3 The Company will maintain an effective internal control system to combat corruption, which includes balancing and accounting audits, data storage, including related business processes.
- 11.4 The Company has established procedures for reporting audit results and reporting on urgent issues. as follows
- 1) The Internal Audit Department shall report the results of the audit and the issues found to the Audit and Governance Committee every time and report it to the Chief Executive Officer.
 - 2) After the report of the audit results The Internal Audit Department will discuss the results of internal control with the line management. To find appropriate internal control guidelines.
 - 3) If it is found that there is an urgent issue. The Internal Audit Department will immediately notify the Chairman of the Audit and Governance Committee.
 - 4) The Audit and Governance Committee will continue to report the audit results to the Board of Directors.

12. Data storage

- 12.1 The Company and its subsidiaries have a policy to comply with the standards. Principles and applicable laws regarding the reporting of accounting and financial information.
- 12.2 All types of expenses must be documented. The Company and its subsidiaries shall be subject to the relevant laws and regulations.
- 12.3 The Company and its subsidiaries do not allow the recording of false information. In addition, there must be no accounts outside the financial statements to support or conceal improper payments.

13. Human Resource Management

This anti-corruption policy covers the personnel management process, from recruitment or selection of personnel, promotion, training, performance evaluation of employees and workers, and remuneration. Supervisors at all levels are required to communicate and understand the employees and employees under their responsibility and must supervise the implementation effectively as follows

- 13.1 Employment: The Company and its subsidiaries have determined the types and qualifications of employees and workers for employment, and candidates who meet the criteria specified by the Company and its subsidiaries must not have a history of performing or omitting to perform their duties or abusing their authority and position, seeking undue benefits through corruption, in any form, with a procedure for considering a person to work as follows:

- Applicants shall submit an application form with evidence as required by the Company and its subsidiaries at the Human Resources Department.
- The Human Resources Department considers the preliminary qualifications and works with the management of the agency that wants to accept employees and employees to work for the knowledge test. Abilities as deemed appropriate.
- When the Company and its subsidiaries have entered into a contract to hire a person to work in any position, that person is considered to be an employee or employee of the Company and the subsidiary company receives the wages specified in the employment contract. The wage rate is determined according to knowledge, ability, experience and competitive conditions in the labor market.

13.2 Performance Evaluation The Company has organized a performance evaluation in 2 phases as follows:

- Performance evaluation during the probationary period, in which employees and employees who start a new job must carry out a probationary period not exceeding 120 days from the date of commencement of work.
- Annual performance evaluation to jointly understand the work goals and improve the performance of employees and employees in the past year, including the evaluation of work behavior, especially behavior that shows non-performance or omission of performing duties or abuse of authority and duties to seek improper benefits through corruption, in any form.

13.3 The Board of Directors is responsible for verifying the suitability and adequacy of personnel in anti-corruption operations.

14. Training and Communication

14.1 Board of Directors

The Company and its subsidiaries shall ensure that all directors are informed of the Anti-Corruption Policy.

14.2 Employees

- All employees shall receive training on the aforementioned policy during the new employee orientation. They may also access the policy and its latest updates on the Company's website. The Company will notify employees of any significant changes to the information.
- All employees shall receive regular training on anti-corruption practices to raise awareness of various forms of corruption.

15. In case of doubts.

If any employee or worker is not sure that any action may be characterized as corruption, or in the event of any question or doubt, the employee shall be liable to the Registrar of Persons for Corruption. Employees and workers should consult the Internal Audit Department directly.

This policy is effective from December 19, 2025 with the approval of the Board of Directors at the 8th meeting of 2025.

Mr. Paitoon Taveebhol
Chairman of the Board of Directors