



UACJ (Thailand) Co., Ltd.

บริษัท ยูเอซีเจ (ประเทศไทย) จำกัด

7/352 Moo 6 Mabyangporn, Pluakdaeng, Rayong 21140, Thailand, Tel. 038-027360

7/352 หมู่ 6 ตำบลมายางพร อำเภอปลวกแดง จังหวัดระยอง 21140 โทรศัพท์ 038-027360

Anti-Corruption Policy

Corruption is a serious issue that severely undermines transparency, credibility, and the long-term sustainability of the company. Conducting business with integrity and free from corruption is therefore essential, serving as a fundamental foundation for building trust and confidence among customers, business partners, investors, and all stakeholders.

Accordingly, UACJ (Thailand) Co.,Ltd. has established the following Anti-Corruption Policy:

Basic Policy

UACJ (Thailand) Co.,Ltd is committed to conducting its business with transparency, integrity, and good governance, and to actively combating all forms of corruption and bribery, whether direct or indirect. All employees must strictly adhere to the Company's anti-corruption policy and are prohibited from engaging in or accepting any form of corruption. This policy applies to all business operations across every department and related activities. It aims to promote compliance with Thai laws and international standards on anti-corruption, anti-bribery, supporting the sustainable development of the organization.

The Company will regularly monitor compliance with this policy and review relevant guidelines and requirements to ensure alignment with changes in business conditions, laws, regulations, and related rules.

1. Purpose

UACJ (Thailand) Co., Ltd. recognizes the importance of managing corruption risks and is committed to conducting business with integrity and transparency, in compliance with applicable laws and good business ethics. This commitment supports the sustainable development of the organization and fosters a corporate culture grounded in the highest standards of morality and ethics.

Therefore, the Company has established this policy to set guidelines for preventing and combating all forms of corruption, whether arising internally or externally. The objectives of this policy are to:

1. Demonstrate the Company's intent and commitment to conduct business ethically and in accordance with the law.
2. Establish standards and guidelines for employees, management, the Board of Directors, and all relevant stakeholders to act with honesty and integrity, avoiding behaviors that may constitute corruption or violate ethical standards.
3. Promote a corporate culture that upholds transparency and instills a strong sense of morality and ethics at all levels of the organization.
4. Prevent risks arising from corruption, such as loss of resources, damage to the Company's reputation, or adverse effects on the confidence of customers, business partners, investors, and stakeholders.
5. Define procedures for monitoring and channels for reporting inappropriate conduct or suspected corruption, while ensuring proper protection for whistleblowers.
6. Ensure compliance with relevant laws, such as the Organic Act on Anti-Corruption B.E. 2561 (2018), as well as internationally recognized governance practices.

The Company will take necessary and continuous measures to ensure that this policy is effectively implemented, with regular monitoring and evaluation. This will contribute to enhancing the Company's credibility and achieving sustainable long-term growth.



2. Scope of Application

This policy applies to the following individuals: This policy is binding on the Company's directors, executives, employees, all staff both permanent and temporary and agent on behalf of the company.

3. Definition

Corruption means any behavior or act that is illegal, unethical, or violates moral principles, involving the misuse of power or authority for personal gain or the benefit of a group. It may manifest in various forms, such as bribery, embezzlement, abuse of power, bid rigging, or other types of corrupt practices. Corruption distorts fairness and justice, causing both direct and indirect harm to the company's credibility, transparency, and sustainable development.

Bribery means the giving, receiving, or offering of valuable items such as money, assets, gifts, benefits, or anything else, to induce a person to perform or omit an act related to their position or authority in an illegal, unethical, or unfair manner. Bribery undermines the organization's credibility, reduces transparency, and negatively impacts the company's business operations.

Employees refers to all directors, executives, employees, all staff members both permanent and temporary and agent on behalf of the company.

4. Duties and Responsibilities

All employees of UACJ (Thailand) Co., Ltd. are regarded as vital contributors to the promotion of transparent business operations and play a direct role in the prevention and elimination of corruption within the organization. Accordingly, every employee is entrusted with the following duties and responsibilities:

1. Strict Compliance with the Policy

Employees must study, understand, and strictly and continuously comply with the Company's Anti-Corruption Policy.

2. Avoid Any Acts of Corruption

Employees are prohibited from engaging in giving, receiving, or soliciting bribes or any acts that may constitute corruption, whether directly or indirectly.

3. Avoid Conflicts of Interest

Employees must not use their positions to seek personal gain or engage in transactions that may create conflicts of interest with the Company.

4. Report Suspicious Behavior or Whistleblowing

If employees witness or suspect any acts that may constitute corruption, they must promptly report to their supervisors or through the designated channels set by the Company.

5. Cooperate in Investigations

Employees are required to provide accurate and complete information or documents when requested by internal audit units or responsible authorities.

6. Participate in Training or Related Activities

Employees must attend training sessions or activities organized by the Company to enhance their knowledge and understanding of anti-corruption measures.

7. Be a Role Model within the Organization

Employees should perform their duties with honesty, integrity, and ethics, upholding the Company's reputation.

8. Be Accountable for Their Actions

Employees must recognize the importance of complying with the Anti-Corruption Policy and take responsibility for their actions in the course of their work. In cases of non-compliance, the Company will consider appropriate measures based on facts and principles of fairness.

5. Key Practices

All employees of the company, at every level, are required to comply with the following established guidelines.

1. The Company does not permit any form of corruption, whether direct or indirect.
2. All employees are strictly prohibited from being involved in any form of bribery, whether in giving or receiving.
3. Do not neglect or ignore any suspected or observed instances of fraud; such matters must be reported immediately to management or the responsible department and cooperate fully in the investigation of the facts.
4. The Company will investigate and impose disciplinary actions on offenders according to company regulations, and may also pursue legal proceedings.
5. Employees are encouraged to demonstrate honesty, transparency, and ethical conduct in their work.
6. In any actions that may pose a risk of fraud or corruption, strict compliance with the prescribed guidelines for each specific matter must be exercised with carefulness and diligence.

6. Support and Prevention Measures

- ▶ Provide periodic training on ethics and anti-corruption.
- ▶ Establish effective internal control and internal audit systems.
- ▶ Maintain a channel for employees and external parties to report corruption anonymously and with protection, managed by an independent unit to ensure whistleblower information is kept confidential and not disclosed to unauthorized persons, except as required by law.
- ▶ There is a proper system in place for the accurate recording, secure storage, backup, and transparent disclosure of financial accounting information to facilitate thorough auditing and business review.
- ▶ Implement a risk assessment system related to corruption in various company processes, such as procurement and contract management.

7. Complaint Channels

The Company has established mechanisms for whistleblowing, receiving complaints, and taking action in cases involving violations of laws, regulations, codes of conduct, or behaviors that may indicate corruption by Company employees.

The Company has measures to protect whistleblowers based on the principles of ethics, prohibition of retaliation, and in accordance with the whistleblowing rules. The Company shall strictly uphold the confidentiality of the whistleblower and carry out the investigation in accordance with fair and appropriate procedures.



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Employees and external parties can report complaints or provide whistleblowing information through the following channels:

1. Report directly via the contact number: 038-027360 Ext: 245, 207, 331.
2. Report to the immediate supervisor or the head of the Administrative department or Human Resources Management Section.
3. Reports via email to Email: uathcompliance1@uath.uacj-group.com (Legal).
Email: uathcompliance2@uath.uacj-group.com (Director).
Email: uathcompliance3@uath.uacj-group.com (Internal Audit).
4. Send by postal mail to the Compliance Director, or the Legal following address:

UACJ (Thailand) Co.,Ltd

7/352 Moo 6 Mabyangporn, Pluakdaeng, Rayong 21140.

8. Policy Review and Update

The Company shall review and update this policy regularly whenever there are changes in applicable laws or relevant regulations, to ensure that it remains current and appropriate to the circumstances.

Effective date: 7 November 2025

(Mr.Tetsuya Yamada)

President of UACJ (Thailand) Co.,Ltd.

7 November 2025