

Summary of Anti-corruption Policy

Kiatnakin Phatra Financial Group

■ Purpose

Kiatnakin Phatra Financial Group (“the Group”) intends and is committed to taking a stand against corruption in any form by adhering to the the Group’s Guidelines for Business Conduct and Corporate Governance Principles, as well as regulations according to the laws on anti-corruption, which are to be strictly followed. The Group has defined this Anti-corruption Policy to be used by its directors, executives, and employees as guidelines to perform their duties in a transparent manner against corruption, paving the way to building a mutual attitude towards anti-corruption and a sustainable organization.

■ Principle

The Group’s policy forbids its directors, executives, and employees from giving any bribes, payoffs, or payments, of any kind to any person, government official, or entity, for the purpose of improperly obtaining or retaining business or influencing consideration of any business activity, as well as, directly or indirectly, requesting or accepting gifts, frequent or excessive entertainment, or any similar form of consideration that is of more than nominal value from any person or entity with which the Group does, or seeks to do, business. Also, the Group will not cooperate with or support any activities that are illegal, involve corruption, or are a threat to society and national security.

The Group will not demote or take disciplinary action against anybody who refuses to be involved in a corruption scheme, even though it may have made the Group lose a business opportunity.

■ Political Contributions

“Political contributions” mean giving financial or in-kind support or participating in an event, as well as encouraging employees to participate in political activities on behalf of the Group. This does not include directors’, executives’ and employees’ participating in activities according to their personal rights.

The Group has a policy of conducting business with impartiality. It does not pay attention to any politics, political parties, or politicians affiliated with any political party and will not provide capital or assistance in any other form for political contributions as defined in the first paragraph.

- **Sponsorships**

“Sponsorships” mean money, assets, or any other benefits given for the purpose of the business, brand, or reputation of the Group, such as the presentation of the Group's logo, being named in an opening or closing speech, receiving tickets to attend the event, etc.

The Group does not have a policy of providing financial support to third parties or making promises or offers to provide financial support to third parties in order for the Group to gain an improper competitive advantage or for other unlawful purposes that can damage the Group's reputation.

- **Charitable contributions**

The Group donates to or supports the budget by focusing on creating benefits for society or for the purpose of clearly promoting the development of communities, society, and the environment in a transparent manner that is not contrary to the requirements of the law. There must be no donations of any kind made to evade or cover up corruption.

- **Receiving and giving gifts, hospitality, and other benefits**

Receiving gifts, hospitality, and other benefits must not, directly or indirectly, affect the decision-making or the performance of duties in a way that impairs the ability to use neutral judgment in decision-making or leads to inappropriate benefits or conflicts of interest.

Giving gifts, hospitality, and other benefits must proceed with caution and prudence and have no characteristic that leads to corruption, whether directly or indirectly, or leads to the exercise of discretion in the performance of duties that may be biased in a favorable manner.

Receiving and giving gifts, hospitality, and other benefits must be of reasonable value and not contrary to the requirements of the law. It must not be different or have a frequency beyond the normal practice of general people or not be according to the customs and traditions in society. It must be consistent with the business principles of the Group and not cause damage to the Group's reputation.

- **Facilitation Payments**

“Facilitation payments” mean any money, item, or benefit given to government officials, whether directly or indirectly, to reduce steps or speed up operations according to the work process that government officials already have a duty to perform.

The Group has no policy to pay facilitation payments in any case.

- **Conflict of Interest**

The Group has a policy on the prevention of conflicts of interest, about which the Group is careful because conflicts of interest can lead to corruption.

- **Revolving Door**

The Group may consider hiring or appointing government officials or former government officials to work for or hold positions in the Group, which must be done in accordance with the relevant laws, and such employment or appointment must not create a conflict of interest between the interests of the Group and the public interest or government benefits, causing the Group to gain an unfair advantage or affecting the independence of such government officials. The Group will disclose information on compliance with such a policy to the public.

- **Procurement of Goods and Services**

The procurement of goods and services by the Group must be based on the principle that the Group must get the most benefit from the selection process of vendors, contractors, or consultants that are transparent, honest, unbiased, and verifiable. Directors, executives, and employees are strictly prohibited from receiving any benefits from those who participate in the selection process. The Group will notify the seller, contractor, or consultant of its anti-corruption Policy, and they must comply with the anti-corruption laws of Thailand, as well as the Group's Anti-corruption Policy and procurement regulations specified by each company in the Group.

- **Human Resources Management**

The Group has established a human resources management process that reflects its anti-corruption commitment, ranging from establishing an efficient organizational structure that strengthens the Group's transparency to establishing a human resources management process that reflects its anti-corruption commitment. There is a separation of duties and responsibilities. The working process of each department must have a clear chain of command in order to maintain an appropriate balance of power. It includes recruitment or selection of personnel for promotion, training, employee performance appraisal, and compensation; determining appropriate procedures to penalize employees who do not comply with the Anti-corruption Policy; internal communication to directors, executives, and employees of the Bank and the Group companies for their acknowledgment, understanding, and awareness of compliance with such an anti-corruption policy; and encouraging executives to communicate with

employees to understand business operations and supervise the operations under their responsibility to be in accordance with the policy set by the Group.

■ **Communication and Channels for Complaints and Whistleblowing**

Communication

The Group has arranged the dissemination of its Anti-corruption Policy. This is part of the key principles in the Group's business ethics. Directors, executives, and employees of the Group must generally be aware of such a policy and use it as a practical guideline along with regulations and operational regulations.

In addition, the Group has arranged to communicate its Anti-corruption Policy to business partners of the Group, companies that the Group has control over as business agents, and stakeholders through email, the Group's website, the annual report, the sustainability report, as well as its various public relations media.

Channels for Complaints and Whistleblowing

Directors, executives, and employees of the Group must not neglect or ignore when they see or have doubts about actions that may be considered corrupt. The whistleblowing must be reported through the channels specified by the Group, and the whistleblower must cooperate in the investigation of various facts. Otherwise, they may be presumed to have participated in such acts.

In order to facilitate complaints or whistleblowing for people within the Group and outsiders, the Group has provided channels for complaints or whistleblowing including any other channels that the Group uses.

Complainant or Whistleblower	Channel
Directors, executives, and employees of the Group	1. Independent Director 2. Chairman of the Board of Directors 3. Chairperson of the Audit Committee 4. Chief Executive Officer 5. Head of department 6. KKP Contact Center 7. The website's online form 8. Compliance via email: GroupCompliance-Advisory@kkpfg.com

Complainant or Whistleblower	Channel
Third parties or stakeholders (e.g., shareholders, clients, partners, including employees of partners)	<ol style="list-style-type: none"> 1. Independent Director 2. KKP Contact Center 3. The website's online form

In this regard, the Group will protect whistleblowers and information providers acting in good faith (such as acting fairly without intent to bully, etc). The information and evidence will be kept confidential and will only be known to the people assigned and involved. This includes not taking disciplinary action or punishing those who deny corruption. The Group will proceed according to the complaint handling process, investigate the facts, and consider disciplinary actions as specified by the Group.

■ **Internal Control and Risk Assessment**

Internal Control

The Group has established internal controls covering finance, accounting, record keeping, and other processes within the Group related to anti-corruption practices. There are internal control and internal audit systems that are appropriate and effective, namely: 1) control of the environment, such as organizational structure with segregation of duties, checks and balances, policy and business ethics formulation, and personnel readiness; 2) risk assessment; 3) control activities, such as ensuring the completeness and accuracy of financial reports and storing supporting documents; 4) information and communication systems; and 5) monitoring and evaluation.

Risk Assessment

The Group has established operational risk management that designs and develops risk assessment tools for use in the Bank and the Group companies by requiring all units to identify and conduct risk control self-assessment (RCSA), including assessing risks that may cause corruption in accordance with policies, rules, regulations, and tools set by the risk management unit. They should then report the risk assessment results to the Bank's Operational Risk Management Department on a regular basis so as to review, analyze, and prepare reports for submission to the Bank's Risk Oversight Committee and senior executives, to be able to effectively monitor and control operational risks under acceptable risk levels and be prepared to handle risks that may occur in the future. This includes reviewing and recommending policies, rules, regulations, and operational risk management practices for the Bank and the Group companies to manage the risk of corruption through the Risk Management Group.