



Metro Systems Corporation Public Company Limited

ANTI-CORRUPTION POLICY

PRINCIPLE

Metro Systems Corporation Public Company Limited places great importance on conducting business with integrity, transparency, and fairness, and in accordance with good corporate governance principles. The Company is committed to social responsibility and to all stakeholders and is dedicated to combating corruption in all its forms. The Company has therefore established policies, practices, and procedures to prevent corruption in all of its activities. This includes conducting regular assessments of corruption risks to manage those risks at an acceptable level, ensuring that the company's operations are free from any involvement in corruption, both directly and indirectly. Additionally, the Company has joined the “Thai Private Sector Collective Action Coalition Against Corruption” (CAC) to demonstrate its intention and commitment to combating corruption in all its forms.

DEFENITION

The Company means Metro Systems Corporation Public Company Limited, Subsidiaries and Associated Company

Subsidiaries means Metro Connect Company Limited and Metro Professional Products Company Limited

Associated Company means HIS MSC Company Limited

Corruption means the act of giving or receiving bribes from government agencies, officials, or private organizations, as well as seeking undue benefits that are not legally entitled, either for oneself or for others, both within and outside the organization. This is done in order to influence someone to perform or refrain from performing their duties, or to secure or maintain inappropriate business advantages. However, this does not include actions that are legally permitted by laws, regulations, announcements, or commercial customs and traditions. It also includes corruption in any other case as defined by law.

Facilitation Payments means a small amounts of money paid informally to government officials to ensure that they carry out their duties or to encourage them to expedite the process. These actions do not require the discretion of the government official and are part of the official duties of that official. Additionally, it is a right that a legal entity should already have according to law.

Political Assistance means support in various forms, whether financial, through loans, or other means, to support political activities.

Providing and Receiving Support means giving or receiving financial support, hospitality expenses, gifts, assistance funds, charitable donations, or other benefits to customers or individuals associated with or having a benefactor relationship with the company.

Giving and/or Receiving Donations means giving or receiving money paid for activities that are not intended for business-related returns.

Gift means all gifts, including personal gifts given or received from officials or individuals who have, may have, or may foster business relationships with the company.

Hospitality and Entertainment means hosting events on various occasions or according to customs or traditions, providing or receiving privileges for services, entertainment, recreation, as well as giving or receiving travel expenses, hospitality expenses, travel costs, accommodation fees, meals, or anything similar from officials or individuals who have, may have, or may foster business relationships with the company.

Tradition means festivals or significant days during which gifts may be exchanged, and it also includes occasions for expressing congratulations, showing gratitude, offering hospitality, expressing sympathy, or providing assistance as per social etiquette.

Bribery means the act of persuading, offering, promising, or giving something in order to gain an advantage in business, contracts, regulations, laws, or personal relationships.

Conflict of interest means a situation or action of an individual within a company where their personal interests overlap with the collective interests. These personal interests influence decision-making or the performance of duties in the position that the individual holds, which leads to the inability of that person to make decisions or perform their duties impartially or fairly

Public employees means civil servants, officers, staff, employees, committees, or individuals working in administrative agencies, dispute resolution boards, committees, or individuals authorized by law to issue regulations, orders, or resolutions that affect individuals.

GUIDELINES

1. Directors, Executives, and Employees at all levels of the Company must adhere to the Anti-Corruption Policy and Code of Conduct. They must not be involved in, engaged in, or accept any form of corruption, whether direct or indirect, for the benefit of themselves, their family, friends, or individuals with other relationships.
2. Directors, Executives, and Employees at all levels of the Company must avoid actions that create a conflict of interest with the company. Any actions taken must be reasonable and based on the principle of acting in the best interests of the Company and must not violate any relevant laws or regulations of the Company.

3. Employees of the company must participate in monitoring and preventing corruption. They should not ignore or neglect any such activities. If an employee observes actions that may constitute corruption, they must report it to their supervisor, an Independent Director, or the Company's Audit Committee, and cooperate in the fact-finding investigation.
4. The Company will provide protection to employees who refuse to engage in corruption, report information, or file complaints regarding corruption related to the Company, in accordance with the protection measures set by the company, fairly.
5. The Company will not demote, punish, or take any negative actions against Directors, Executives, or Employees at all levels who refuse to engage in corruption, even if such actions result in the Company losing business opportunities or a competitive advantage, as the Company has a clear communication process regarding this matter
6. Anyone who commits, is involved in, or supports corruption is considered to have violated the Company's Code of Conduct. The Company will impose disciplinary measures and determine the appropriate punishment according to the company's work regulations. However, if action is illegal, individual may also face legal penalties as prescribed by law.
7. The Company will provide knowledge and raise awareness among Directors, Executives, and Employees at all levels regarding their duties and responsibilities under the anti-corruption policy. This will also include educating any other individuals who are required to perform tasks or duties related to the company's business operations.
8. The Company is committed to fostering a corporate culture that rejects corruption in all transactions with both the public and private sectors.
9. If an employee has doubts or is unsure whether an action may constitute corruption, or if they have any questions or concerns, they should consult their direct supervisor or the internal audit department.

REGULATIONS AND PROHIBITIONS

1. Concerning the Recruitment, Selection of Personnel, and Promotion Processes.

The Company places great importance on the recruitment, selection of personnel, and promotion processes, ensuring transparency and fairness. It is required that all levels of management consider the company's guidelines and communicate with employees to ensure that these practices are effectively managed and carried out as follows:

- 1) In recruitment or selection, the supervisor must consider knowledge and abilities without bias or conflict of interest.
- 2) In promotions processes, the supervisor must consider actual performance fairly and impartially, without bias.

2. Concerning the Giving or Receiving of Gifts, Hosting or Being Hosted, and Hospitality Services

The Company places importance on the giving or receiving of gifts and/or any other benefits, as well as hosting, being hosted, or providing hospitality services. Therefore, the Company has established guidelines for the giving or receiving of gifts, financial support, or charitable donations as follows:

- 1) Directors, Executives, and Employees shall not solicit or accept gifts or any other benefits from clients, business partners, or stakeholders involved with the company's business that could influence decisions unfairly.
- 2) Directors, Executives, and Employees may accept and give gifts or other benefits, including hosting or being hosted, on various occasions in accordance with customary practices or commercial traditions that are permitted.

3. Concerning Financial Support or Charitable Donations.

The Company places importance on contributing to society. Charitable donations or financial support to various organizations must be made in accordance with the guidelines for giving or receiving gifts, financial support, or charitable donations as follows:

- 1) Donations or Financial Support must be made transparently and in compliance with the law.
- 2) Donations must ensure that the donated funds or financial support are not used as a cover for bribery.
- 3) Payment, compensation, or any other benefits must not be given to support or assist any unlawful political activities.

4. Business relationships and procurement with the public sector.
 - 1) Bribery or payment of facilitation fees to government officials is strictly prohibited under any circumstances.
 - 2) The Company's operations and dealings with the public sector must be conducted transparently, honestly, and in compliance with the relevant laws.
 - 3) The Company has no policy of hiring government employees at any level in any process as a quid pro quo for obtaining benefits for the company.

WHISTLEBLOWING AND COMPLAINTS

The Company has established guidelines for reporting whistleblowing or complaints related to corruption, actions that may constitute a conflict of interest, or actions that violate the law or the company's code of conduct. The details are in accordance with the company's whistleblowing or complaint reporting procedures.

PENALTY

Directors, Executives, or Employees at all levels who violate this policy will be subject to disciplinary action according to the company's regulations and may be liable for violations of applicable laws, rules, or other relevant regulations.

REVIEW OF THE POLICY

The Company will regularly review its Anti - Corruption policy to ensure that it remains aligned with and complies with legal requirements and regulations.

Anti - Corruption policy has been approved by the Company's Board of Directors

