

Policy and Program for Anti-Bribery and Corruption

General principles

Krungsri Securities Public Company Limited (“the Company”) is strongly committed to upholding the principle of business ethics. Bribery and corruption, in any form, are strongly prohibited even though such bribery and corruption may provide business opportunities for the Company in its operations. In order to ensure above commitments, the Company set up the Policy and Program for Anti-Bribery and Corruption (“the Policy”) to serve as a basic framework to which the Company is strictly adhered in its business operations.

This Policy applies to the Company which is based on the Policy and Program for Anti-Bribery and Corruption of Bank of Ayudhya Public Company Limited (“Bank”) as a guideline. The relevant unit are required to adopt this policy as a guideline for their operations and set relevant rules in accordance with this Policy.

The directors, executives, employees, and all related parties are obligated to strictly adhere to this policy.

Important Definitions

Bribery Any offer, promise, or giving of Anything of Value intended to improperly obtain or retain business or other advantages. Bribes may be paid directly or indirectly or through third-party providers, and are not limited to the giving or receiving of Cash or Gifts.

Corruption The misuse of entrusted power or public office for improper benefit or gain for oneself or others. The term covers Bribery of Public Officials as well as a range of other criminal offences, including fraud, extortion, and money laundering.

Anything of Value Anything of tangible or intangible value. This may include, but not limited to:

- 1) Gifts
- 2) Entertainment (e.g., meals, travel, accommodation, training, and conference invitations)
- 3) Donations and Sponsorships
- 4) Political Contributions
- 5) Speaker fees and Honoraria
- 6) Offers of Employment or Work Experience

Enforcement of Policy and Program for Anti-Bribery and Corruption

This Policy shall be effective on the date the Board of Directors approved.

Guidelines of Policy and Program for Anti-Bribery and Corruption.

Prohibited Activities

The Company prohibits all forms of bribery and corruption, whereby the employees are not allowed to perform the following prohibited activities:

1. Giving or receiving Cash or Cash Equivalents in connection with the activities under this Policy.
2. Offering, promising, or giving Anything of Value, directly or indirectly, to anyone—or planning, supporting, or authorizing the same—if doing so is intended or could reasonably appear as intended to improperly obtain or retain business or any other advantage.
3. Soliciting or receiving Anything of Value, directly or indirectly, from anyone, if doing so is intended or could reasonably appear as intended to improperly influence an Employee in his or her activities on behalf of the Company.
4. Using personal funds to provide Anything of Value to any counterparty in connection with the Company's business.
5. Offering, promising, or giving Facilitation Payments to Government Officials to improperly expedite or facilitate government actions or services.
6. Directly and indirectly offering, promising, or giving Kickback to Government Officials, Vendors, Prospective Vendors, Client, Prospective Client, or Other in any forms.
7. Falsifying or concealing any books, records, accounts, or other information or data related to the activities of the Company, its clients, service providers, vendors, suppliers, or other business partners.
8. Violation of any relevant laws, regulations, or the Company's Policies.

Preventive measures on anything of value

While providing or receiving Anything of Value to or from anyone may be permissible, it nonetheless can create bribery and corruption risk and appearance concerns for employees and the Company. Accordingly, employees are expected to exercise good judgment and ensure that such activity is for a legitimate business purpose, reasonable, accurately documented, and not causing a conflict of interest situation or violation of local law. As set forth below, under certain circumstances employees must obtain pre-clearance of Anything of Value offered / received directly or indirectly to / from clients, prospective clients, Public Officials, or others.

1. Gifts, Entertainment and Other Expenses

The giving or receiving of gifts, entertainment, etc. must be appropriate and in line with the local traditions and conventions as well as comply with applicable laws including the laws of the counterparty country.

2. Donations and Sponsorships

Donations or sponsorships are prohibited if they are intended or could reasonably appear as intended to improperly obtain or retain business or other business advantages.

3. Political Contributions

Political Contributions are prohibited by using personal assets or on behalf of the company in order to influence external parties, which may benefit the company or give the company an unfair business advantage.

4. Speaker Fees and Honoraria

Speaker fees or honoraria paid to Public Officials must be avoided due to such payments are intended or appear intended to improperly influence the recipient.

5. Employment or Work Experience

Extending an offer of employment or work experience, whether paid or unpaid, is considered as providing Anything of Value under this policy.

Prohibition for extending an offer of employment or work experience with the expectation of receiving or retaining any improper benefits or advantages.

For the high-risk candidates, the Company shall treat such candidates in the same manner as any other candidates (they must not receive any preferential treatment); and require the approval by Managing Director and Compliance Pre-Clearance before offering of employment or work experience.

6. Third Party Intermediaries (TPIs)

TPIs present heightened anti-bribery and corruption risk because they may provide Anything of Value to Public Official, client, prospective client, or others to obtain improper benefit for the Company. The Bribery is strictly prohibited. A bribe paid by a TPI in connection with the Company's business can be just as damaging as a bribe paid by an employee.

Before creating any relationship with TPIs, due diligence and risk assessment must be conducted on TPIs. The approval process, including by compliance pre-clearance, and propose to the Managing Director for approval. Initiating a relationship and entering into a contract with TPIs, and continuously monitoring TPIs to ensure all processes as specified in the ABC procedure.

Penalty

Directors who violate this Policy may be liable under the relevant laws, regulations, rules, or requirements. Employees who violate this Policy will be subject to disciplinary action according to the Company's rules and may be committed to an offence under other relevant laws, regulations, rules, or requirements.

Frequency of review

This Policy shall be reviewed every year or upon any substantial revision.

Reporting Suspicions or Whistleblowing

The company provides whistleblowing channels for all stakeholders regarding incident or suspicions of wrongdoing by company and employees, including information on bribery and corruption that may cause damage to the company included providing measures in place to protect whistleblowers who report in good faith.