Announcement of AOT Ground Aviation Services Company Limited
No. AOTGA/289/2567
Subject: Anti-Corruption Policy

AOT Ground Aviation Services Company Limited (AOTGA) operates in accordance with the principles and guidelines of good corporate governance, adhering to governance principles that ensure its management meets international standards. The Company is committed to conducting business with honesty, integrity, transparency, and fairness, and to upholding its responsibilities to society and all stakeholder groups. It strictly adheres to professional codes of conduct, ethical and moral principles, good corporate governance principles, government and private-sector rules and regulations, and the Company's working practices in all activities related to its business operations.

The Company rejects and opposes all forms of fraud and corruption. It also instils in its personnel a commitment to professional conduct, ethics, and integrity in service delivery, supporting its sustainable development as a High-Performance Organization.

The Board of Directors has therefore established this **Anti-Corruption Policy** as an integral part of the Company's Corporate Governance Policy. This policy is intended to ensure that the Company operates in accordance with its established policies and that directors, executives, employees, personnel, and any persons acting for the benefit of the Company uphold it as a standard for their work. Any action that does not comply with the Company's policy shall be subject to disciplinary action and applicable legal penalties.

Definitions

"Company" means AOT Ground Aviation Services Company Limited (AOTGA).

"Fraud" means any act undertaken to obtain benefits to which a person is not lawfully entitled, for themselves or others.

"Corruption" means any act involving giving, requesting the giving of, promising to give, soliciting, receiving, or agreeing to receive property or any other benefit, whether or not it has monetary value, involving government officials, government agencies, private-sector entities, or any other persons, to induce the performance or omission of duties, whether or not such performance is proper, or to dishonestly obtain or retain property or any other benefit.

"Property or any other benefit" means money, property, or any other benefit provided as a gesture of goodwill, a reward, or an incentive, including preferential privileges, whether they have monetary value. It also includes payment for travel or leisure trips,

accommodation, meals, or other benefits of a similar nature, whether provided through cards, tickets, or other forms of documentation.

"Conflict of interest" means any act in which the personal interests of an individual, or those of related persons, whether related by blood or otherwise, may influence decision-making or obstruct or hinder the Company's best interests.

"Government agencies" means central, provincial, and local government administrations; state enterprises under the law governing budgetary procedures; public organizations; independent organizations; constitutional organizations; court administrative offices; universities under state supervision; agencies under or supervised by Parliament; independent state agencies; and other agencies specified in ministerial regulations.

"Stakeholders" means individuals or groups directly or indirectly affected by business operations, those who have an interest in such operations, or those who can influence persons in a manner that may affect the Company's business operations.

"Personnel" means the Company's directors, executives, employees, workers, and contract employees.

Guidelines

All Company personnel, and any persons acting for or on behalf of the legal entity, whether they are authorized to do so, shall comply with the following guidelines:

1. Comply with the Anti-Corruption Policy, the Business Code of Conduct, and the Company's rules, regulations, and requirements. Personnel must not become involved in any form of fraud or corruption, either directly or indirectly.
2. Perform their duties with honesty, integrity, and transparency, and always remain prepared for their performance to be audited by the Company or relevant agencies.
3. Refrain from giving, requesting the giving of, promising to give, soliciting, receiving, or agreeing to receive property or any other benefit, whether or not it has monetary value, involving persons connected with the Company, in order to obtain benefits for the Company, themselves, or stakeholders.
4. Avoid actions that constitute a conflict of interest with the Company. Operations and work must be undertaken reasonably, for the benefit of the Company, and without contravening applicable laws, rules, or regulations.
5. Do not disregard or remain indifferent upon witnessing conduct that may constitute fraud or corruption involving the Company. Personnel have a duty to

report such conduct to their supervisor or the responsible person and to cooperate in the investigation.

6. Personnel are prohibited from receiving property or any other benefit in connection with the performance or omission of duties, except where such receipt is customary on festive occasions or important dates, whether or not the property or benefit has monetary value. This also includes receiving property or other benefits on occasions involving congratulations, expressions of gratitude, hospitality, condolences, or customary social courtesies. The price or value must not exceed **THB 3,000**.
7. Personnel have a duty and responsibility to safeguard and use the Company's assets for the Company's greatest benefit and must not use them for their own benefit or that of others.

Communication and Training

Company personnel shall regularly receive communication and training on the Anti-Corruption Policy to ensure their awareness of this policy and the procedures for reporting observed or suspected fraud or corruption.

The Company shall also communicate and publicly disclose its Anti-Corruption Policy to the public and stakeholders through its various online and offline channels.

Training on this policy shall form part of the orientation programme or be provided before all new employees assume their positions within the Company.

Whistleblowing and Complaints

1. Company personnel or stakeholders from any group who observe fraud or corruption, conduct that reasonably raises suspicion of a potential opportunity for fraud or corruption, or conduct that violates the law, moral principles, working guidelines, or the Company's Business Code of Conduct may report such matters through the channels specified below.
2. Reports and complaints should include the complainant's full name, position, telephone number, email address or LINE ID, details of the facts, and supporting evidence, with relevant documents attached, if any. The Company shall keep the information of whistleblowers and complainants confidential. Where a whistleblower or complainant wishes to remain anonymous, the report or complaint must contain sufficiently detailed facts or clear evidence to demonstrate the alleged fraudulent conduct.

3. Reports and complaints shall be submitted through the following designated channels:

3.1 By post, addressed to:

Internal Audit Department
AOT Ground Aviation Services Company Limited
222, Room 4326, 4th Floor, Passenger Terminal 1
Don Mueang International Airport
Vibhavadi-Rangsit Road, Sanam Bin Subdistrict
Don Mueang District, Bangkok 10210, Thailand

3.2 By email:

whistleblowing@aotga.com

Review of Whistleblowing Reports and Complaints

1. The person receiving a whistleblowing report or complaint shall collect information and verify the facts. To ensure an effective investigation, one or more persons may be assigned or appointed to conduct the investigation. The findings shall be reviewed and summarized for submission to the supervisor or management within **30 days**. The recipient of the report or complaint, or the appointed investigator or working group, may invite relevant personnel to provide information or respond to allegations, and may request relevant documents or evidence to support the investigation.
2. If the investigation establishes that the accused person has engaged in corruption under this policy, or has violated laws, rules, regulations, working guidelines, or the Company's Business Code of Conduct, that person may be subject to disciplinary action in accordance with the Company's regulations. Disciplinary action shall also extend to personnel who were not originally accused but are found to have been involved in the conduct.
3. Where the matter raised in a complaint has caused harm to any person, the Company shall offer appropriate and fair measures to remedy the harm to the affected person, as it deems appropriate.

Personal Data Protection and Confidentiality Measures

1. The Company shall conceal personal information that could identify whistleblowers, complainants, and persons cooperating in an investigation. Such information shall be kept confidential unless disclosure is required by law.

2. Whistleblowers, complainants, and persons cooperating in an investigation who believe that they may face threats to their safety or unfair treatment that could cause harm may request appropriate protective measures from the Company. The Company may also establish protective measures without a request from the whistleblower, complainant, or cooperating person if it considers that the circumstances are likely to cause harm or threaten their safety.

Penalties

Any violation of, or failure to comply with, the policy and guidelines set out above shall be subject to consideration for disciplinary action under the Company's work rules and regulations. The person responsible shall also be liable to compensate the Company or persons affected for damage resulting from such conduct and may face legal proceedings where the conduct also constitutes a violation of the law.

This announcement is issued for the information of all concerned.

Announced on **12 July 2024**

(Mr. Siriwat Towachirakul)
President
AOT Ground Aviation Services Company Limited