

## Anti-Fraud and Anti-Corruption Policy

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Prima Marine Public Company Limited

2026 Revised Edition

## Anti-Fraud and Anti-Corruption Policy

### 1. Introduction

Prima Marine Public Company Limited (the "Company") conducts its business with integrity, honesty, and transparency, in alignment with the principles of good corporate governance. The Company maintains a policy of opposing fraud and corruption in all forms, whether direct or indirect, and regardless of whether such acts occur domestically or internationally. The Company strictly complies with all applicable laws, rules, and regulations, and actively promotes anti-fraud and anti-corruption as integral elements of its corporate culture.

For this reason, the Company has established this Anti-Fraud and Anti-Corruption Policy as a framework and guideline for directors, executives, employees and persons acting on behalf of the Company to strictly observe and comply with. They shall not give or receive bribes, money, gifts, compensation or any unlawful benefits, whether directly or indirectly, and shall avoid and not support any business dealings or transactions with persons or entities involved in fraud or corruption. This is to prevent potential fraud and corruption risks, ensure that the Company's business operations are transparent and auditable, and build confidence among all stakeholders.

### 2. Objectives

- 2.1 To express the Company's intention to conduct business with integrity, honesty and transparency, and to oppose fraud and corruption in all forms.
- 2.2 To establish rules, guidelines and measures to prevent directors, executives, employees and person acting on behalf of the Company from becoming involved in fraud and corruption, whether directly or indirectly.
- 2.3 To establish processes for supervision, review and monitoring of compliance with this Policy, and to ensure that the Company's operations comply with applicable laws, rules and regulations.

2.4 To build knowledge and understanding, and encourage directors, executives and employees at all levels to participate in monitoring, preventing and reporting suspected fraud and corruption through the channels designated by the Company.

### 3. Scope

3.1 This Policy applies to directors, executives and employees at all levels of the Company and its subsidiaries.

3.2 The Company encourages associated companies, joint ventures, agents and/or business intermediaries, and business partners to comply with this Policy.

### 4. Definitions

The following terms used in this Policy shall have the meanings set out below, unless otherwise stated or explained.

**"Fraud"** means the misuse of authority, duties or assets to seek benefits for oneself or others, thereby causing damage to the interests of others or the organization. Fraud can be classified into four main categories: embezzlement, procurement fraud, bribery and corruption, financial statement fraud, and cybercrime. Fraud may occur in many forms, such as conflicts of interest, extortion for benefit, money laundering, concealment of facts, obstruction of justice, or hacking into computer systems to access personal data and use such data for personal benefit. This covers both relationships between the private sector and government agencies, and relationships among private-sector parties.

**"Conflict of Interest"** means a situation or action in which an employee has a personal interest that conflicts with the Company's interests. Such interest may be financial or arise from a personal relationship, whether direct or indirect, and may affect decision-making or prevent the employee from performing duties impartially.

**"Corruption"** means the use of one's authority to perform or omit any act in order to seek benefits that should not lawfully be obtained, whether for oneself or others. This includes wrongfully requesting, accepting or agreeing to accept gifts, services, cash, assets or any other benefits that may be calculated in monetary terms for oneself or others, in order to perform or omit any act in one's position;

or giving, offering or promising to give assets or other benefits to a government official, foreign public official, official of a public international organization, officer of a private organization, or any other person who conducts business with the Company, in order to induce such person to perform, omit or delay the performance of an act wrongfully in relation to his or her duties.

**"Political Assistance"** means the provision of money, assets, goods, rights or any other benefits as assistance, support or for any other benefit to a political party, politician or person with political duties, as well as political activities, whether directly or indirectly, unless it is support for the democratic process that may be carried out as permitted by law.

**"Donation"** means the provision of money or assets for public charity, public benefit, education or sports, without tangible consideration in return.

**"Donation Acceptance"** means accepting money or assets without solicitation or request for use in any activity, whether or not the purpose of the donation is clearly specified.

**"Sponsorship"** means providing or receiving monetary or non-monetary support to or from customers, business partners, joint venture parties or other people through activities or projects with the objective of promoting the Company's business, image or reputation, or strengthening business relationships. Such sponsorship must be reasonable and appropriate for the occasion, transparent, supported by a contract or evidence for accounting records, and able to identify the related persons and details of the activity.

**"Giving and Receiving Bribes"** means paying, offering, promising to give, accepting, or requesting anything of value, such as money, assets, goods, rights or any other benefits, to induce a person to perform or omit duties in violation of laws, ethics or relevant regulations, in order to obtain or retain an improper business advantage and thereby affect the credibility of the Company and its subsidiaries.

**"Gift"** means money, assets or any other benefits given to one another as courtesy, and includes money, assets or other benefits given as a reward, gratuitously, for assistance or as a token of appreciation, the granting of special privileges that are not rights generally available to the public, whether in the form of cards, tickets or other evidence, advance payment, or subsequent refund.

**"Receiving or Giving Gifts or Other Benefits"** means the receiving or giving by employees at all levels of the Company of any goods or services to build good relationships in accordance with normal customs or business practices. This is regarded as an expression of social etiquette. Gifts may take many forms, such as money, assets, products, services or vouchers.

**"Receiving or Providing Entertainment"** means activities intended to build good relationships in accordance with customary practice. Such activities are expressions of social etiquette carried out as appropriate for business or trade, such as meals and beverages, accommodation, transportation for site visits, sports entertainment, or other expenses directly related to business or trade customs.

**"Receiving or Providing Hospitality"** means the Company's receiving or providing reception and assistance to visitors with friendliness and care, making visitors feel comfortable and satisfied.

**"Facilitation Payment"** means any unofficial payment made to a government official to ensure that the official carries out a process, or to expedite such process. Such process must not require the official's discretion, must be an act lawfully performed as part of the official's duty, and must be a right to which the person is already legally entitled.

**"Customary Practice"** means festivals or important occasions on which gifts may be given, and includes occasions for congratulations, gratitude, hospitality, condolences or assistance in accordance with socially accepted etiquette.

**"Government Official", "Foreign Public Official" and "Official of a Public International Organization"** shall have the same meanings as prescribed in the law on the prevention and suppression of corruption.

## **5. Duties and Responsibilities**

5.1 **The Board of Directors** has the duties and responsibilities to establish and approve the Anti-Fraud and Anti-Corruption Policy, and to oversee the Company to ensure an effective internal control and risk management system for preventing corruption. This includes authorizing the Company's sub-committees and/or Management to implement compliance with relevant policies and procedures, with regular monitoring of compliance with this Policy.

5.2 **The Audit Committee** has duties and responsibilities to review whether the Company has adequate financial and accounting reporting systems, internal control systems and internal audit systems. It also reviews operations to ensure compliance with anti-corruption policies and measures throughout the process, including risk assessment and management, communication and training complaint channels and investigations, enforcement of penalties, and regular reporting and follow-up. The Audit Committee oversees the Company to ensure effective internal control systems and mechanisms to prevent, detect and reduce risks of fraud, corruption and bribery in all forms.

5.3 **The Corporate Governance and Sustainable Development Committee** has the duties and responsibilities to establish and review anti-fraud and anti-corruption policies and measures, and to propose them to the Board of Directors for approval.

5.4 **Management** has the duties and responsibilities to establish anti-corruption measures, promote, support and supervise employees and relevant persons to strictly comply with the Anti-Corruption Policy, and review the appropriateness of systems and measures to ensure consistency with changes in business, rules and legal requirements.

5.5 **The Internal Audit Department** has the duties and responsibilities to audit and review operations to ensure that they are conducted properly and in compliance with relevant policies, guidelines, procedures and laws, to ensure that the internal control system is appropriate and adequate for potential fraud and corruption risks, and to report to the Audit Committee.

5.6 **The Company's employees** have the duties and responsibilities to acknowledge, understand and strictly comply with this Policy.

## 6. Practical Guidelines

### 6.1 General

6.1.1 The Company has a Zero Tolerance Policy for anti-corruption and complies with all applicable anti-fraud and anti-corruption laws in Thailand.

- 6.1.2 The Company is committed to building and maintaining an organizational culture that recognizes corruption as unacceptable in transactions with both the public and private sectors.
- 6.1.3 Directors, executives and employees at all levels must strictly comply with the Anti-Corruption Policy and the Business Code of Conduct and must not be involved in fraud or corruption in any form, whether directly or indirectly, including requesting, receiving or paying bribes to any person or juristic person involved in corruption.
- 6.1.4 Directors, executives and employees at all levels must not give, offer, or promise to give any assets or benefits to a government official, foreign public official, official of a public international organization, officer of a private organization, or any other person who conducts business with the Company, in order to induce such person to perform, omit or delay the performance of an act wrongfully in relation to his or her duties, whether for the benefit of the Company, themselves or others.
- 6.1.5 Directors, executives and employees at all levels must not wrongfully request, receive, or agree to receive any assets or benefits for themselves or others, to perform or omit any act in their position, whether such act is lawful or unlawful in relation to their duties.
- 6.1.6 Directors, executives and employees must not assign any other person to perform the acts under Clauses 6.1.4 - 6.1.5 on their behalf.
- 6.1.7 Directors, executives and employees of the Company must not request, carry out or accept corruption in any form, whether directly or indirectly, for the benefit of the organization, themselves, their families, friends or acquaintances.
- 6.1.8 Directors and executives at all levels must demonstrate integrity and serve as good role models in complying with this Policy.

## 6.2 Political Assistance

6.2.1 The Company has a policy of political neutrality and shall not support, assist or perform any act that favors any political party, political group or politician, whether directly or indirectly.

6.2.2 Employees have the rights and freedoms to participate in political activities under applicable laws. However, they must not refer to their employee status, or use any property, equipment or tools of the Company for any political activity. When participating in political activities, employees must exercise caution in any actions that may create the impression that the Company supports or favors any political party. Participation in political activities by employees must be undertaken only on their personal time and at their personal expense.

## 6.3 Charitable Donations and Donation Acceptance

6.3.1 The Company supports charitable donations in the form of financial assistance, goods or other forms, such as knowledge sharing or time contribution, as part of social contribution activities and to promote public relations and a positive image of the Company without expecting any return. Donations must be transparent, lawful and not contrary to morality, and must not cause any damage to society.

6.3.2 The Company controls charitable donations to ensure that they are not used as a pretext or channel for corruption. Donations must follow the disbursement procedures and be approved by authorized persons in accordance with the Company's regulations.

6.3.3 Evidence indicating the value of the donation and the name of the person or organization receiving the donation must be clearly retained for future verification.

6.3.4 The Company has no policy to accept donations from any organization for the benefit of the Company's business operations or business activities if such acceptance would result in an exchange of benefits or binding conditions to benefit a government official,

foreign public official, official of a public international organization, officer of a private organization, or any other person who conducts business with the Company.

## **6.4 Sponsorship**

6.4.1 Sponsorship of any activity or project, whether monetary or non-monetary, must have the objective of supporting business operations, promoting a positive image or reputation, or public relations, in a manner beneficial to building trade credibility or strengthening business relationships. Sponsorship must be transparent, lawful and not contrary to morality, and must not cause any damage to society.

6.4.2 The Company controls sponsorship to ensure that it is not used as a pretext or channel for corruption. Sponsorship must follow the disbursement procedures and be approved by authorized persons in accordance with the Company's regulations.

6.4.3 The Company has no policy to improperly receive sponsorship from customers, business partners, joint venture parties or other persons for any purpose.

## **6.5 Giving or Receiving Gifts, Entertainment and Other Benefits**

6.5.1 Employees may give gifts and provide entertainment to any person only if all of the following conditions are met:

- 1) It is not given to dominate, induce or reward any person in order to obtain a business advantage, or as an explicit or hidden exchange for assistance or benefits.
- 2) It complies with applicable laws, policies, regulations and relevant rules.
- 3) It is given in the name of the Company, not in the name of an employee.
- 4) It is in accordance with customary practice or business customs; the type and value are appropriate and suitable for the occasion.
- 5) It is not a gift in the form of cash or a cash equivalent, such as a gift card or voucher.
- 6) It is given openly.

6.5.2 The Company controls the giving of gifts and entertainment to ensure that they are not used as a pretext or channel for corruption or bribery, by requiring disbursement procedures and approval by authorized persons in accordance with the Company's regulations.

6.5.3 Employees may accept gifts only where the gift is given in accordance with customary practice and has a value not exceeding Baht 3,000. If an employee is unable to refuse and it is necessary to accept a gift valued at more than Baht 3,000 to maintain cordiality, friendship or a good relationship, the employee must inform his or her supervisor. If the gift received is cash, the employee must refuse it in all cases.

6.5.4 Employees may accept gifts received from lucky draws, provided that such gifts are not given specifically to the employee.

6.5.5 Receiving entertainment should comply with the following criteria:

- 1) It must be in accordance with customary practice or business customs; the type and value must be appropriate and suitable for the occasion.
- 2) It must not conflict with applicable laws, policies, regulations and relevant rules.
- 3) Employees must not request or suggest that entertainment be provided.

6.5.6 Receiving or providing hospitality should comply with the following criteria:

- 1) Provide reception and assistance to visitors with friendliness and care, making visitors feel comfortable and satisfied in accordance with customary practice and suitable for the occasion.
- 2) It must not conflict with applicable laws, policies, regulations and relevant rules.
- 3) Employees may receive or provide hospitality to maintain good relationships and courtesy with those they contact, without expecting or suggesting any return.

## 6.6 Facilitation Payments

6.6.1 The Company has no policy to pay facilitation payments in any form, whether directly or indirectly, and shall not carry out or accept any act in exchange for facilitation in business operations.

## 6.7 Employment of Government Officials

6.7.1 In employing a government official to hold a position as director, executive, employee or advisor of the Company, such employment must not create a conflict between personal interests and public interests, and must not conflict with any law, regulation or rule.

6.7.2 Employment of a government official must go through the selection process, background check, employment approval, remuneration determination, and control procedures to ensure that such employment does not create a conflict between personal interests and public interests; is not a reward for obtaining any benefit; does not improperly benefit the Company; and does not impair the Company's image of credibility and integrity in the performance of duties. Such employment must not give rise to risks of fraud and corruption, conflicts of interest, biased government supervision, or state actions that improperly benefit the Company.

6.7.3 The Company shall disclose information on the positions and experience of government officials in the event that a government official is employed, in the Company's published documents.

## 7. Risk Assessment

7.1 Risk assessment is the foundation of anti-fraud and anti-corruption measures. Therefore, all executives must understand how the Company's business processes are exposed to fraud and corruption risks to manage them.

7.2 The Company must assess fraud and corruption risks that may arise within the Company, establish risk management measures appropriate to the assessed risks, and regularly monitor and review risk management.

## **8. Internal Control and Risk Management**

8.1 The Company shall maintain an effective internal control and risk management system to combat fraud and corruption, covering checks and balances and cross-checks in accounting, procurement, data storage, and other business processes related to this Policy.

8.2 The Company must establish procedures to ensure that the internal controls of accounting, data retention, documents and records are reviewed to confirm the accuracy and appropriateness of financial reports, and to ensure that transactions are supported by sufficient evidence.

8.3 The internal control system consists of organization-wide controls, as well as specifically defined controls and procedures designed to address the fraud and corruption risks that the Company may face.

8.4 The internal control unit must report the results of internal control assessments to the Internal Audit Department. If any issue of non-compliance with the Anti-Corruption Policy is found, the relevant departments shall be informed as appropriate to improve control measures.

## **9. Record Keeping**

9.1 The Company complies with applicable standards, principles and laws on accounting and financial reporting.

9.2 All types of expenses must be supported by documents. The storage and retention of the Company's data must comply with applicable laws and regulations.

9.3 The Company does not allow false, improper, incomplete or inaccurate records, or any accounting manipulation. There shall also be no off-book accounts used to support or conceal improper payments.

## **10. Human Resources Management**

10.1 The Company must establish human resources management processes that reflect its commitment to anti-corruption, covering recruitment and selection of personnel, promotion, training, performance evaluation, remuneration, and organizational structuring with

appropriate segregation of duties to ensure checks and balances. The Company shall also ensure that adequate and suitable resources and skilled personnel are available to implement this Policy.

## 11. Training and Communication

11.1 The Company places importance on communicating and publicizing the Anti-Corruption Policy to build knowledge and understanding among directors, executives, employees and stakeholders of the Company, as well as disclosing information to the public. The Compliance and Company Secretary Office and Human Resources Department are responsible for disseminating knowledge, building understanding, and encouraging employees at all levels to seriously and continuously adhere to and comply with this Policy, thereby embedding it as part of the corporate culture.

11.2 The Company communicates the Anti-Corruption Policy through both internal and external media, such as announcements, the Company's website, and the annual report.

11.3 All employees shall receive regular training on anti-corruption practices, including the forms and risks of fraud and corruption relevant to the Company's business operations, such as giving bribes, receiving bribes, giving or receiving gifts or other benefits, entertainment, facilitation payments, and conflicts of interest, as well as prevention methods, proper practices, and reporting procedures in cases where fraud is observed or suspected.

11.4 All new employees of the Company shall receive orientation on the Anti-Corruption Policy and shall receive a copy of this Policy to acknowledge, understand and strictly comply with it.

11.5 The Company shall communicate its Anti-Corruption Policy to subsidiaries, associated companies, other controlled companies, business partners, agents, business intermediaries, distributors of goods or services, and contractors from the beginning of the business relationship and thereafter as appropriate. The Company encourages business partners, agents, business intermediaries, distributors of goods or services, and contractors to adopt anti-corruption practices consistent with the Company's standards.

## 12. Guidance on Compliance with the Anti-Corruption Policy

12.1 If directors, executives or employees have any doubt as to whether their own actions comply with the Anti-Corruption Policy, they should consider the following before acting or making a decision:

- (1) Is the action lawful and in compliance with official and Company regulations?
- (2) Is the action acceptable to society and can it be disclosed publicly?
- (3) Does the action violate ethics and may it cause damage to the actor, others or the Company's reputation, either at present or in the future?

12.2 If there is uncertainty as to whether any act may constitute corruption, or if there are any questions or doubts as to whether any act may be considered giving or receiving a bribe, employees should report the information or facts, or consult their supervisor or the Compliance and Company Secretary Office, so that the relevant factors can be jointly considered and the proper action taken.

## 13. Reporting Fraud and Corruption

13.1 Directors, executives and employees at all levels must not ignore or neglect any act that may constitute corruption involving the Company. They must inform their supervisor or responsible person through the channels specified in the "Complaint Handling and Whistleblowing Policy on Misconduct and Fraud" and cooperate in any fact-finding process.

## 14. Employee Protection

14.1 The Company shall provide fairness and protection to employees who refuse corruption, report complaints or whistleblowing information on corruption involving the Company or cooperate in fact-finding processes. The Company shall not demote, punish or impose any negative consequence on such employees, even if their actions result in the Company losing a business opportunity.

## 15. Penalties

15.1 When the Company receives a complaint regarding fraud or corruption through the designated channels, it shall appoint a working group and/or investigation committee to investigate, collect evidence, establish facts, and consider disciplinary action as prescribed by the Company and/or any applicable legal penalties. The investigation result shall be summarized within 30 days from receipt of the complaint. The Company shall report the investigation result to the relevant executives and the complainant within 7 days from the conclusion of the investigation.

15.2 Any director, senior executive or employee of the Company who violates this Policy shall be considered for dismissal, termination of contract by the Company, or disciplinary action in accordance with the Company's regulations. In addition, such person may be subject to legal penalties if the act is unlawful. Lack of awareness of this Policy and/or relevant laws cannot be used as an excuse for non-compliance.

15.3 A supervisor who ignores a breach of or non-compliance with this Policy by his or her subordinate, or who is aware of such act but fails to address, correct or report it, shall be subject to disciplinary action in accordance with the Company's regulations.

15.4 Agents, business intermediaries, distributors of goods or services, or contractors of the Company who violate the criteria under this Policy, or who are aware of acts contrary to this Policy but fail to report them to the Company's Management or provide incorrect information, may have their contracts terminated.

## 16. Related Policies

Employees have a duty to study and understand this Policy together with the Company's other policies and manuals as follows:

16.1 Corporate Governance Policy

16.2 Business Code of Conduct

16.3 Complaint Handling and Whistleblowing Policy on Misconduct and Fraud

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16.4 Company Work Regulations

16.5 Relevant Company Regulations and Operating Manuals

## 17. Monitoring and Review

17.1 The Compliance and Company Secretary Office shall regularly monitor compliance with this Policy by the Company's executives and employees. In the event that this Policy is reviewed and amended, the updated Policy shall be communicated through the Company's communication channels to directors, executives and employees at all levels of the Company and its subsidiaries.

17.2 The Internal Audit Department shall regularly review internal control systems and processes to ensure that the internal control system is effective in anti-corruption. It shall discuss the review results with relevant departments to identify appropriate corrective actions and report to Management and the Audit Committee accordingly.

## 18. Policy Review

The Compliance and Company Secretary Department shall review this Policy annually and propose it to the Board of Directors for approval if there are any changes.

This Policy shall be effective from 14 May 2026 onwards.

-Signature-

(Mr. Bowon Vongsinudom)

Chairman of the Board of Directors

Prima Marine Public Company Limited