

# **ANTI-CORRUPTION POLICY**

**Oji Paper (Thailand) Ltd.**

Approved by

The Board of Directors Meeting No. 6/2025, held on 14 October 2025

Effective Date

14 October 2025

## Message from the Managing Director

Oji Paper (Thailand) Ltd., as a member of the Oji Group in Japan, is committed to conducting business with integrity, transparency, and fairness, under the principles of good corporate governance, legal compliance, and accountability to society and all stakeholders at every level.

With the intention of establishing a transparent and trustworthy management system, the Company officially declared its participation in the Thai Private Sector Collective Action Against Corruption (Thai CAC) on 14 October 2025, and established the Anti-Corruption Working Group under the supervision of the Compliance Committee to effectively implement the policies and practices.

This policy has been developed as a guideline for directors, executives, employees, and all relevant stakeholders to ensure lawful operations, adherence to ethical standards, and alignment with the practices of the Oji Group. It aims to foster an organizational culture that is aware of the risks and impacts of corruption and to support the Company's responsible and sustainable growth.

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Motoyasu ISHIGURO

Managing Director  
Oji Paper (Thailand) Ltd.

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# **Anti-Corruption Policy**

## **1. General Principles**

Oji Paper (Thailand) Ltd. is committed to conducting business with transparency, accountability, and adherence to good corporate governance. The company has zero tolerance for all forms of corruption, whether direct or indirect, and regardless of whether such actions originate from internal personnel or external parties connected to the company.

All directors, executives, employees at all levels, as well as business partners, agents, intermediaries, and stakeholders, are required to strictly comply with this policy. Offering, receiving, or consenting to any assets, benefits, or inappropriate actions that may constitute corruption is strictly prohibited.

The company promotes a culture of integrity by implementing internal controls, monitoring and regularly reviewing the policy. It also encourages employees and related parties to report any suspicions or concerns regarding corruption without fear of retaliation. All complaints will be investigated appropriately, and fair and proportionate actions will be taken to ensure that the organization operates ethically, transparently, and sustainably.

## **2. Objectives**

- (1) To declare the commitment of Oji Paper (Thailand) Ltd. to conducting its business with transparency, fairness, and accountability, with zero tolerance for all forms of corruption, whether direct or indirect.
- (2) To establish concrete guidelines for the effective prevention, detection, and management of corruption risks, including mechanisms for regular review, monitoring, and evaluation of the policy.
- (3) To raise awareness and promote a culture of integrity by ensuring that directors, executives, employees, and all related parties understand their roles, duties, and responsibilities. The Company also encourages vigilance and the safe and fearless reporting of suspected corruption through designated channels.

### **3. Scope**

This policy and its practices apply to the Board of Directors, sub-committees, executives, and employees at all levels of Oji Paper (Thailand) Ltd., including its affiliates and companies within the Oji Group.

In addition, it extends to external stakeholders such as business partners, customers, contractors, service providers, agents, intermediaries, independent contractors, consultants, or any individuals or entities acting on behalf of, or potentially impacting the Company, either directly or indirectly (collectively referred to as "business-related parties").

All individuals or entities mentioned above are required to strictly comply with this policy, which is considered an integral part of the Oji Group's Code of Conduct. This supports the establishment of an organizational culture that values transparency and strictly prohibits all forms of corruption.

### **4. Definitions**

#### **4.1 Category 1: Organizational Structure and Related Parties**

##### **4.1.1 Company**

Refers to Oji Paper (Thailand) Ltd., a legal entity established under Thai law and conducting business within the Kingdom of Thailand.

##### **4.1.2 Group Company**

Refers to Oji Paper (Thailand) Ltd., including its parent company, subsidiaries, affiliates, or any other entity over which the Company has control or the authority to direct financial and operational policies, whether directly or indirectly.

##### **4.1.3 Company Personnel**

Refers to directors, executives, permanent employees, temporary employees, contract staff, and all individuals working for the Company under any form of employment arrangement. This also includes interns and external personnel working at the Company's premises as designated by the Company.

##### **4.1.4 Stakeholders**

Refers to individuals or legal entities involved with or affected by the Company's business operations, either directly or indirectly. Examples include shareholders, customers, business partners, creditors, government agencies, communities, and society at large.

**4.1.5 Business-Related Parties**

Refers to individuals or legal entities directly or indirectly involved with the Company in the conduct of business. This includes agents, intermediaries, consultants, independent contractors, suppliers, distributors, contractors, business partners, or employees of such entities who may engage in negotiations, contracts, or act on behalf of the Company.

**4.1.6 Business Representative**

Refers to an individual or legal entity appointed by the Company to act on its behalf, such as distributors, consultants, independent contractors, or any person authorized to act for the Company, as specified in a relevant contract or agreement.

**4.1.7 Customer**

Refers to an individual or legal entity that purchases products, uses services, or conducts business with the Company, whether directly or through an authorized representative.

**4.1.8 Business Partner**

Refers to an individual or legal entity that has a business relationship with the Company, such as suppliers, service providers, contractors, or strategic partners with whom the Company enters into contracts or cooperative agreements.

**4.1.9 Related Person**

Refers to a spouse, child, parent, direct relative, or close associate of a Company personnel whose relationship may influence the personnel's decision-making or who may receive benefits from actions or decisions made by the Company personnel.

**4.1.10 Nominee**

Refers to an individual or legal entity that holds assets, rights, or other benefits on behalf of another person for the purpose of concealing or disguising the true identity or ownership of those benefits.

#### **4.1.11 Third-Party Intermediary**

Refers to an individual or legal entity who is not an employee or executive of the Company but is hired or assigned by the Company to perform certain tasks on its behalf. These tasks may include conducting business, acting as an agent, engaging in negotiations, or facilitating various matters. Such intermediaries may include consultants, agents, brokers, distributors, local coordinators, or external service providers. Their involvement must be subject to appropriate due diligence, risk assessment, and control processes in accordance with Company policy.

#### **4.1.12 Ultimate Beneficial Owner (UBO)**

Refers to a natural person who ultimately owns or controls a business, either directly or indirectly, whether through shareholding, voting rights, or other means. This may involve the use of intermediaries such as nominees or cross-shareholding companies to obscure identity. Disclosure of the UBO is essential to prevent risks related to corruption, money laundering, or unethical relationships.

### **4.2 Category 2: Government and Public Sector**

#### **4.2.1 Government Official / Public Official**

Refers to any individual who performs duties on behalf of the state, whether appointed or elected, and regardless of whether they receive compensation. This includes:

- Civil servants
- Employees and officials of state enterprises
- Employees of government agencies
- Members of local administrative organizations
- Political office holders
- Members of boards, subcommittees, or advisory bodies in government agencies

Individuals or groups appointed or authorized to exercise administrative power or perform governmental duties under the law

This definition also includes former government officials who, although no longer in office, maintain relationships with the private sector in ways that may allow them to exploit information, influence, or relationships from their previous positions for personal or others' benefit, or create conflicts of interest.



#### **4.2.2 Government Agency**

Refers to any agency or organization established by or under the control of the state. This includes ministries, bureaus, departments, central government agencies, regional and local government bodies, parliamentary bodies, courts, independent organizations, the Office of the Attorney General, state enterprises, and any entity that is owned or controlled by the government, directly or indirectly.

#### **4.2.3 Revolving Door**

Refers to the hiring or appointment of individuals who formerly held positions in government agencies to work in the private sector, or vice versa—the movement of private sector personnel into government positions. This may pose risks of conflict of interest or corruption, as such individuals might use information, relationships, or influence gained from their previous roles to benefit the company or organization.

### **4.3 Category 3: Types of Corruption and Related Behaviors**

#### **4.3.1 Fraud**

Refers to any act, omission, or behavior carried out with dishonest intent to unlawfully gain benefits for oneself or related parties—such as family members, close relatives, or close associates—or to evade legal obligations, codes of ethics, or company regulations, thereby causing damage to the Company, stakeholders, or the Group.

Fraud can be categorized into three main types:

- Corruption
- Misappropriation
- Falsification of Financial Statements

#### **4.3.2 Corruption**

Refers to offering, promising, requesting, demanding, giving, or receiving money, assets, or any other benefits—either directly or indirectly—to or from government officials, private parties, business partners, customers, business representatives, or related persons to induce or influence unlawful or unethical actions or omissions for illicit gain.

Forms of corruption may include:

- Conflict of Interest
- Bribery
- Illegal Gratuities
- Economic Extortion

**4.3.3 Misappropriation**

Refers to the unauthorized use or diversion of the Company's assets for personal gain or the benefit of others. This may include cash, materials, equipment, intellectual property, or other resources.

**4.3.4 Falsify Financial Statement**

Refers to the intentional distortion or concealment of accounting information or financial reports to misrepresent the Company's actual financial performance.

**4.3.5 Conflict of Interest**

Refers to situations where an individual's personal interests or the interests of close associates are involved in decisions or actions in their role, potentially compromising impartiality or the Company's best interests.

**4.3.6 Bribery**

Refers to giving or receiving anything of value to induce an act or omission that is contrary to duties, legal requirements, or ethical standards, for the purpose of obtaining an improper advantage.

**4.3.7 Illegal Gratuities**

Refers to the giving or receiving of something of value after the performance of duties, as a form of unauthorized reward—even if not prearranged.

**4.3.8 Economic Extortion**

Refers to the act of demanding benefits through threats or economic pressure, such as threatening to terminate a business relationship, in order to obtain something illegal or unethical.

**4.3.9 Facilitation Payment**

Refers to unofficial payments or items given to government officials to expedite the performance of routine duties—such as issuing permits or documents—which the official is already obligated to perform.

## **4.4 Category 4: Special Forms of Benefits**

### **4.4.1 Gift**

Refers to any item, money, asset, or other valuable benefit that is given or received without a direct expectation of return, whether on customary occasions such as New Year, Songkran, congratulatory events, or within the context of business relationships. A gift may take the form of a tangible object, souvenir, coupon, discount, gift card, or any item that can be converted into cash, goods, or services. The giving or receiving of gifts must be conducted appropriately and transparently, without influencing business decisions or creating conflicts of interest, and must not violate any laws, codes of conduct, or company regulations.

### **4.4.2 Hospitality**

Refers to the offering or receiving of meals, beverages, souvenirs, hospitality services, or participation in various activities related to business operations, such as banquets, sporting events, seminars, training sessions, site visits, or other recreational activities. Hospitality may be extended as part of customary business practices or traditions to foster good business relationships. However, such activities must be conducted in a manner that is appropriate, reasonable, transparent, and auditable. They must not be intended to seek or offer improper advantages, influence business decisions, impair objectivity, or create a conflict of interest.

### **4.4.3 Donation**

Refers to the voluntary giving of money, assets, goods, services, or other resources to individuals, organizations, or activities for public benefit—such as foundations, schools, hospitals, or public institutions—without any expectation of commercial return. Donations must be made transparently, be auditable, and serve genuine social purposes.

### **4.4.4 Sponsorship**

Refers to the provision or receipt of assets, services, or other valuable benefits intended to promote the company's reputation, brand, or image in a business context. This includes activities such as public relations, advertising, or enhancing credibility with customers, business partners, or external organizations. Sponsorship may be given to or received from non-profit entities, associations, foundations, or other legally recognized organizations. All sponsorship activities must be conducted transparently, be auditable, and align appropriately with the company's business objectives.

#### **4.4.5 Political Contribution**

Refers to the provision of financial support, assets, goods, privileges, or other forms of assistance to political parties, politicians, election candidates, or individuals involved in political activities, whether directly or indirectly. Such actions may include monetary donations, purchasing fundraising event tickets, promotional advertisements, or participation in activities on behalf of the Company for the purpose of gaining business advantage or competitive benefit. This does not include employees participating in political activities as private citizens in accordance with their legal civil rights.

### **4.5 Category 5: Socio-Cultural Context**

#### **4.5.1 Customary Practice**

Refers to practices commonly observed and continuously followed by individuals within an organization or society, such as greetings, expressions of respect, acts of gratitude, or the giving of appropriate tokens of appreciation. Although not formally governed by law or regulations, these are established behaviors that help foster positive interpersonal relationships.

#### **4.5.2 Cultural Tradition**

Refers to long-standing practices passed down within a society or culture, such as giving gifts during festivals, expressing congratulations or condolences, or following general social etiquette.

#### **4.5.3 Business Convention**

Refers to generally accepted practices or customs within the business community that are not contrary to law or ethics. Examples include business entertainment for relationship-building conducted within appropriate and reasonable boundaries.

## **5. Roles, Duties, and Responsibilities**

To ensure that the Company's anti-corruption policy and measures are practically implemented, consistently applied at all levels, and effectively enforced, the Company has defined the roles, duties, and responsibilities of relevant parties as follows:

### **5.1 Board of Directors**

Responsible for establishing, approving, and reviewing the Company's anti-corruption policy and measures, as well as overseeing the management's implementation and systematic monitoring of their effectiveness. The Board must ensure the existence of an appropriate internal control system aligned with the level of risk, in order to foster a corporate culture grounded in integrity, transparency, and good governance.

### **5.2 Managing Director**

Responsible for driving and overseeing the implementation of anti-corruption measures into practical actions. This includes ensuring that supporting systems are modern, appropriate, and adaptable to changing contexts, encouraging all levels of management to recognize the importance of anti-corruption efforts, and embedding transparency values deeply into the corporate culture.

### **5.3 Compliance Committee**

Responsible for overseeing the Company's anti-corruption operations to ensure alignment with the established policy and guidelines. This includes approving related plans, measures, and reports, and serving as the decision-making body at the management level on matters related to governance, risk, and regulatory compliance. The Committee also monitors, supervises, and evaluates the performance of the Anti-Corruption Working Group and relevant units on an ongoing basis and proposes recommendations or escalates key issues to the Board of Directors for further consideration.

### **5.4 Executives**

Responsible for communicating the anti-corruption policy to personnel under their supervision and ensuring consistent compliance with the policy. They must also review and assess the appropriateness of internal control measures to ensure they remain effective and responsive to changes in the business environment, laws, and regulations.

### **5.5 Anti-Corruption Working Group**

Responsible for continuously assessing and reviewing corruption risks in each business process, preparing reports for management, and recommending appropriate preventive and corrective actions in line with good corporate governance standards.

## **5.6 Company Secretary (Corporate Governance)**

Acts as the liaison between the Anti-Corruption Working Group, executive management, and internal and external stakeholders. Responsibilities include preparing documentation related to compliance with the Thai Private Sector Collective Action Against Corruption (Thai CAC), reporting progress to management, and submitting issues for consideration at Board meetings. The Company Secretary also supports overall corporate governance efforts in coordination with related departments.

## **5.7 Procurement Department**

Responsible for managing corruption risks within the procurement process. This includes conducting comprehensive due diligence on vendors' qualifications, credibility, and financial standing; communicating the Company's anti-corruption policy to all vendors; and strictly enforcing compliance with the established procedures to ensure transparency, accountability, and adherence to principles of good governance throughout the procurement process.

## **5.8 Sales Department**

Responsible for generating revenue with transparency and strict adherence to the anti-corruption policy. The department must avoid offering any improper benefits to customers, business partners, or government officials. Sales promotion activities must be carried out with caution to prevent misunderstandings or violations of business ethics. Clear communication of the Company's policy to customers and partners is essential to ensure mutual understanding.

## **5.9 Human Resources and Administration Department**

Responsible for promoting values of integrity, ethics, and transparency at all levels of the organization. This includes providing internal communication channels, conducting training on the anti-corruption policy, and incorporating ethical responsibility into performance evaluations. The department is also responsible for screening the qualifications and background of candidates for key positions and including ethical clauses clearly in employment contracts.

## **5.10 Legal Advisor**

Responsible for providing legal advice and analyzing the legal validity of policies or activities related to anti-corruption, to ensure compliance with domestic and international laws and to mitigate legal risks.

## **5.11 Managers and Supervisors at All Levels**

Serve as role models in complying with anti-corruption policies and measures. They are also responsible for providing guidance and encouraging employees to report any suspicious behavior. Additionally, they must supervise and ensure that personnel under their authority act in accordance with company standards.

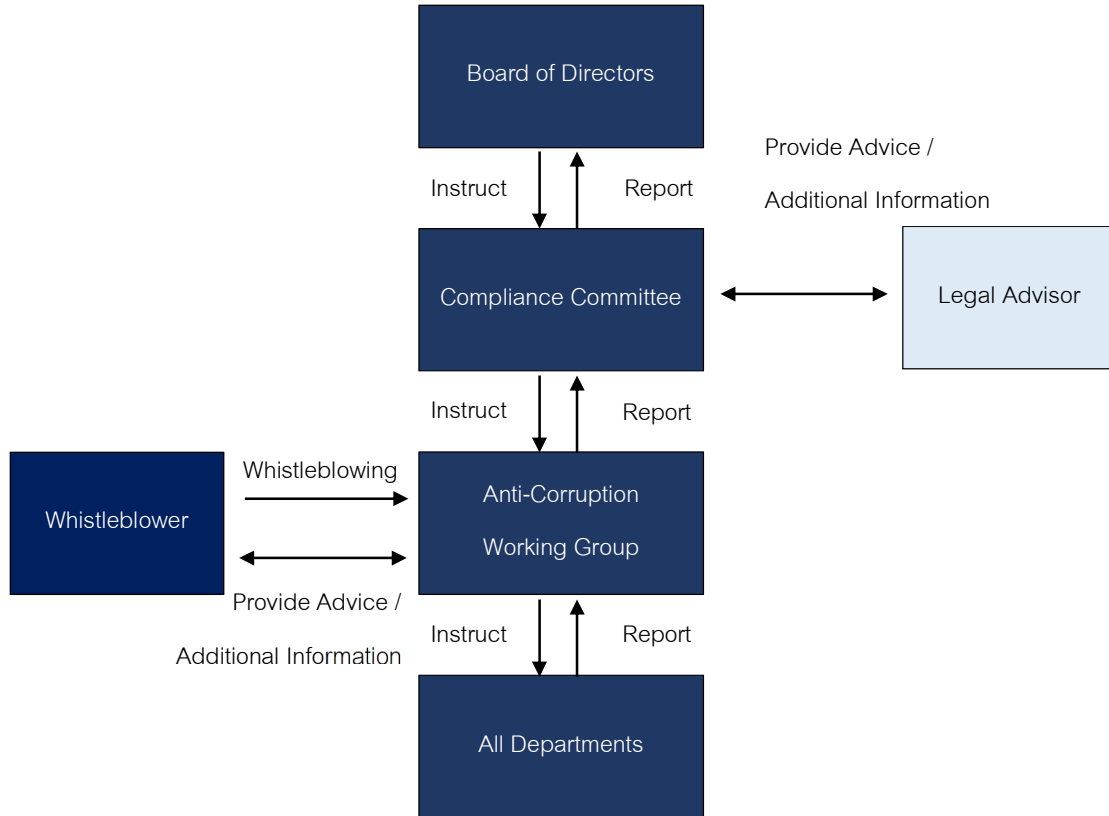
### **5.12 Company Personnel**

Responsible for thoroughly understanding the anti-corruption policy, complying with the established guidelines, avoiding any actions that may lead to conflicts of interest, and promptly reporting any irregularities to supervisors or through the designated reporting channels.

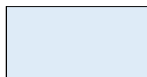
### **5.13 Business Representative Appointment and Due Diligence**

Departments responsible for appointing Business Representatives—such as distributors, consultants, contractors, or agents—must ensure that all appointments are justified, properly documented, and subject to appropriate due diligence. This includes verifying the necessity of the appointment, conducting background checks on credibility, legal status, and potential compliance risks, and formalizing the engagement through written agreements that clearly define roles, responsibilities, scope of work, and terms of engagement. Appointed representatives must be periodically reviewed to assess performance and risk exposure, consistent with the Oji Group’s relevant governance guidelines. All records must be complete, traceable, and available for audit. Coordination with the Compliance Committee is required in cases involving elevated risk.

## Governance Structure Diagram



Internal entities within Oji Paper (Thailand) Ltd.



External entities associated with Oji Paper (Thailand) Ltd.



## **6. Corruption and Fraud Risk Assessment**

Oji Paper (Thailand) Ltd. recognizes the importance of systematically assessing and managing corruption and fraud risks to ensure that such risks are prevented or reduced to acceptable levels. The Company emphasizes the involvement of all departments in ongoing risk assessment processes in alignment with the evolving business environment.

The objective of corruption and fraud risk assessment is to identify, evaluate, and manage potential risks in each organizational process, while raising awareness of the potential impact these risks may have on the Company's goals and operations. This enables timely and context-appropriate risk management actions.

All departments are responsible for cooperating in providing relevant information regarding corruption and fraud risks within their respective operations to ensure accurate, comprehensive, and realistic risk assessments.

The risk assessment process consists of three main stages:

### **6.1 Preparation for Risk Assessment**

This stage involves defining the criteria for measuring impact and likelihood of occurrence, as well as establishing the Company's risk appetite. These criteria serve as the basis for prioritizing risks and planning mitigation strategies in the next steps.

### **6.2 Risk Identification and Assessment**

This involves identifying potential risks within each operational process, analyzing the severity and likelihood of each risk, and evaluating the effectiveness of existing internal controls to determine whether they are sufficient to prevent or mitigate the identified risks.

### **6.3 Implementation of Additional Risk Control Measures**

If existing controls are deemed inadequate, the Company will consider implementing additional control measures or improving practices to bring the risks down to acceptable levels. These measures will be tailored to the nature of each process and the specific risks involved.

The Company conducts corruption and fraud risk assessments and reviews annually or whenever there are significant changes—such as modifications to operational processes, changes in roles and responsibilities, or the emergence of new external risks—to ensure that the Company's risk management remains appropriate and up to date.

## **7. Anti-Corruption Policy and Practices**

The Company has established policies and practices to combat corruption and fraud, aiming to systematically reduce the risk of corrupt behavior within its operational processes. The Board of Directors, Managing Director, executives, and all employees at every level are required to thoroughly understand and strictly comply with these policies and practices without exception. Any violation or non-compliance may result in disciplinary action or legal consequences, as applicable.

The Company recognizes the importance of maintaining strong and positive relationships with its business partners, which are critical to the organization's long-term success. However, any actions involving the giving or receiving of gifts, hospitality, entertainment, sponsorships, donations, or other improper benefits may pose corruption risks and open the door to unethical business practices.

Therefore, the Company has developed clear policies and procedures to serve as guidelines for all personnel to ensure transparent, ethical operations that align with the principles of good corporate governance.

The detailed practices and measures are outlined as follows:

### **7.1 Gift Giving and Receiving**

The company does not support the giving or receiving of gifts that may influence business decisions or create a conflict of interest. However, giving or receiving gifts may be permissible in certain appropriate cases, provided that it complies with applicable laws and company policies, and is carried out in a transparent, accountable, and ethical manner.

#### **7.1.1 Purpose and Appropriateness**

The giving or receiving of gifts must serve a legitimate and appropriate purpose, such as expressing gratitude, offering congratulations, or maintaining business relationships. It must not involve any expectation of return or affect the objectivity of business decision-making. The company sets a gift value limit not exceeding THB 3,000 per recipient per occasion.

#### **7.1.2 Acceptable Types of Gifts**

Gifts that may be given or received must be modest and appropriate to local customs, such as festival souvenirs, calendars, keychains, fresh fruit, or gift baskets. Gifts must not include prohibited items such as cash, checks, gift cards, gold, or convertible assets. Extravagant or luxurious items, such as high-value jewelry or travel packages, are not permitted.

#### **7.1.3 Prohibited Conduct and Specific Restrictions**

Employees are strictly prohibited from soliciting, offering, or accepting gifts in a manner that may create a conflict of interest or constitute improper inducement. Gifts must not be accepted from suppliers or business partners during procurement, negotiation, or bidding processes.

If refusing a gift is not feasible due to social or cultural considerations, the employee must immediately report the incident to their supervisor and submit the gift to the Human Resources Department for further handling.

#### **7.1.4 Gifts Involving Government Officials**

Giving gifts to government officials or foreign public officials should be avoided. In cases where giving a gift is necessary for diplomatic or formal purposes, prior written approval must be obtained from authorized company personnel, and the action must fully comply with applicable laws. All relevant documents and evidence must be recorded and retained.

#### **7.1.5 Recordkeeping, Reporting, and Documentation**

All gift-giving or receiving activities must be recorded in the company's Gift Registry. Responsible personnel must submit reports with supporting documentation such as receipts, gift photos, approval forms, and names of givers or recipients to ensure traceability and transparency. Regular reports shall be submitted to the Compliance Committee.

### **7.2 Hospitality**

The Company permits the offering or acceptance of hospitality when it serves legitimate business purposes and fosters good relationships with stakeholders. Such activities must be conducted appropriately, reasonably, transparently, and auditable, without creating a conflict of interest or compromising objectivity in business decisions.

#### **7.2.1 Purpose and Appropriateness**

Hospitality must have a clear business purpose, such as welcoming partners, attending meetings, trainings, seminars, or job-related activities. It must not be for personal entertainment or disguised leisure purposes.

#### **7.2.2 Acceptable Forms of Hospitality**

This may include meals, beverages, souvenirs, sports events, site visits, or other business-related activities. These must be reasonable, not extravagant, and appropriate to the participants' roles.

#### **7.2.3 Transparency and Management Participation**

Hospitality should be provided in the name of the Company and, where appropriate, involve a manager or higher-ranking employee to ensure propriety, transparency, and accountability.

#### **7.2.4 Participation in Externally Sponsored Events**

Participation in events sponsored by external parties is allowed if the purpose is clearly business-related, not repetitive or leisure-oriented, has been pre-approved by authorized persons, and is disclosed with proper reporting.

#### **7.2.5 Prevention of Improper Influence**

Hospitality must not be solicited, offered, or accepted with the intent to improperly influence business decisions or compromise the integrity of such decisions.

#### **7.2.6 Hospitality Involving Government Officials**

Hospitality involving government officials must be handled with heightened caution and must avoid any actions that could be construed as bribery.

#### **7.2.7 Expenditures and Internal Controls**

All expenditures must comply with the Company's budget, approval authority, and internal control procedures.

#### **7.2.8 Documentation and Auditability**

Records and supporting documents must be properly maintained to ensure that all hospitality activities are auditable.

### **7.3 Sponsorship**

The company permits the provision or receipt of sponsorships that are appropriate and aligned with business objectives, such as enhancing the company's image, brand, or reputation. All sponsorship activities must be conducted transparently, be auditable, and must not be used for personal gain or to improperly influence business decisions.

#### **7.3.1 General Principles of Sponsorship**

All sponsorships provided or received in the name of the company must have a clear purpose, align with the company's strategic direction, and contribute to the benefit of the organization or broader society. The process must be carried out officially, supported by documentation, and approved in advance by authorized personnel in accordance with the company's hierarchy. Sponsorship activities must be transparent, accountable, and must not involve any intent to seek personal benefit or provide undue advantage to any individual.

#### **7.3.2 Eligible Sponsoring Parties**

The company may provide or receive sponsorships to or from external entities with clear legal status, such as customers, business partners, associations, foundations, charitable organizations, non-profit organizations, or government agencies. Sponsorships involving natural persons are not allowed, except when such persons are officially representing an organization recognized by the company's policy.

#### **7.3.3 Approval Procedures**

All sponsorships must be submitted for prior review and approval by authorized individuals according to the company's internal delegation of authority. The applicant must provide complete supporting documentation, including the purpose of the activity, project details, implementation plan, budget, and information about the relevant parties or organizations involved.

#### **7.3.4 Disbursement and Record-Keeping**

Disbursement of sponsorship funds must comply with the approved budget and follow the company's internal review and approval procedures. Supporting documents—such as contracts, letters of appreciation, official receipts, or event photos—must be retained to ensure future auditability.

#### **7.3.5 Restrictions and Risk Prevention**

Sponsorship activities must not involve any conflict of interest or create a perception of bribery or improper influence over public officials or individuals with business decision-making authority. Sponsorships must not be used as a pretext to circumvent legal or ethical obligations.

### **7.4 Donation**

The company permits donations made in the name of the company for public benefit purposes, such as education, public health, religion, the environment, or social support. Donations must be made voluntarily, with transparency and accountability, and must not be used to seek business advantages or influence decisions of government agencies or business partners.

#### **7.4.1 General Principles of Donation**

Donations made on behalf of the company must serve genuine public benefit purposes—such as education, public health, religion, the environment, or social welfare. They must be conducted voluntarily, with transparency, and in a manner that is auditable. Donations must not involve conflicts of interest, be perceived as bribery, or be intended to obtain business advantages in return.

#### **7.4.2 Eligible Recipient Entities**

Recipients of donations must be credible legal entities with public benefit objectives and be subject to verification—such as foundations, schools, hospitals, charitable organizations, or government agencies. Donations to individuals are prohibited unless the person is an authorized representative of an eligible organization.

#### **7.4.3 Approval Process**

All donations must be reviewed and pre-approved according to the company's authority levels. The requester must submit complete supporting information, including the purpose of the activity, project details, the recipient organization, proposed budget, and a risk assessment.

#### **7.4.4 Disbursement and Documentation**

Disbursements must comply with the approved budget and be made through official channels in the name of the company. Supporting documents such as receipts, donation certificates, letters of appreciation, or activity photographs must be collected and retained for audit purposes.

#### **7.4.5 Restrictions and Risk Prevention**

Donations must not be used as a disguised form of bribery or to circumvent ethical requirements. Employees are prohibited from using the company's name or resources for personal donations. Donations via third parties or intermediaries are not allowed without formal approval. Donations that may damage the company's reputation must not be carried out.

### **7.5 Political Contribution**

The Company conducts its business with a commitment to political neutrality, and does not support or engage in any form of political activity. This is to prevent any misunderstanding regarding the Company's political stance, and to mitigate risks related to conflicts of interest, reputational damage, or misuse of corporate resources. The Company has therefore established the following political contribution guidelines.

#### **7.5.1 Company Neutrality**

The Company does not support or engage with any political party, politician, or political group, whether directly or indirectly. The Company shall not take any action that may give rise to a misunderstanding that it is involved in political activities. This includes, but is not limited to, monetary or in-kind contributions, purchasing tickets for fundraising events, political advertising, or using the Company's name in support of any political purpose.

#### **7.5.2 Prohibition on the Use of Company Resources**

Company personnel are strictly prohibited from using the Company's name, position, or any of its resources—such as funds, premises, vehicles, equipment, or working hours—to support or participate in any political activity, in any form or manner.

#### **7.5.3 Personal Political Expression**

Company personnel have the right to express political opinions or participate in political activities as private individuals, in accordance with the Constitution and relevant laws. Such activities must be carried out on their own personal time, and must not involve the Company's name, their job title, or any implication that they represent the Company in any political context.

#### **7.5.4 Prohibition on Political Coercion or Persuasion**

Company personnel must not use their position or authority to persuade, pressure, or coerce others to join or support any political activity, which may affect workplace fairness, relationships, or the Company's reputation.

#### **7.5.5 Use of Company Premises or Property**

The Company does not permit the use of its premises, areas, or assets for organizing meetings, assemblies, campaigning, or any other political-related activities, whether explicitly or implicitly.

## **7.6 Facilitation Payment**

The company considers facilitation payments to be unethical conduct and potentially constituting bribery under applicable laws. Even if such payments are made to expedite routine actions that officials are obligated to perform, they are still deemed unacceptable. To mitigate legal risks and ensure transparency in business operations, the company strictly prohibits all forms of facilitation payments and establishes clear operational guidelines for all personnel.

### **7.6.1 Guideline on Facilitation Payments**

The company strictly prohibits facilitation payments in any form, whether directly or indirectly, whether made personally or through third parties, regardless of the amount, frequency, or circumstances. Any payment made to induce government officials to perform, omit, or expedite an action that they are already legally obligated to carry out shall be regarded as a serious violation of this policy.

### **7.6.2 Prohibited Conduct**

All employees are prohibited from offering, soliciting, promising to give, or accepting facilitation payments in any form, including cash, assets, services, or other benefits that could be interpreted as being made to improperly influence the actions of public officials in favor of the company.

### **7.6.3 Engagement with Government Authorities**

In all dealings with government agencies or officials vested with legal authority, personnel must act with honesty, transparency, and in strict compliance with all relevant laws, regulations, internal rules, and procedures. Personnel must avoid any behavior or provision of benefits that could be misinterpreted as facilitation payments.

### **7.6.4 Handling of Suspicious Situations**

If any personnel encounter a situation that may constitute or be perceived as a request for a facilitation payment—whether explicit or implied—they must politely refuse and immediately report the incident to their direct supervisor or the Anti-Corruption Working Group. If unsure whether a payment or benefit constitutes a facilitation payment, they must consult the Compliance Committee or the Anti-Corruption Working Group before proceeding with any action.

### **7.6.5 Exception in Emergency Situations**

If an employee is in a situation where there is reasonable cause to believe that their life or physical safety is in imminent danger and a payment is necessary for personal protection, they may take only the actions strictly necessary. Once safe, the employee must report the incident to their supervisor as soon as possible and prepare a detailed written record for post-incident review.

### **7.6.6 Recording and Documentation of Transactions**

The company encourages accurate, complete, and transparent recording and retention of all financial transactions involving government agencies. Payments for government fees, services, or licenses must always be supported by official receipts or certified documentation from the relevant authority and must be stored in accordance with the company's document control system.

## **7.7 Employment of Government Officials (Revolving Door)**

The company recognizes the risks of conflicts of interest, undue influence, and the misuse of insider information that may arise from employing current or former government officials. Therefore, the company has established strict policies to prevent corruption, as follows:

### **7.7.1 Prohibition on Hiring Current Government Officials**

The company strictly prohibits the employment or appointment of individuals who are currently holding positions as government officials, whether directly or indirectly, including through individuals or legal entities. This is to avoid conflicts of interest and prevent the misuse of official positions for improper advantage.

### **7.7.2 Employment of Former Government Officials**

In exceptional cases where necessary, the company may consider hiring former government officials under a cautious, transparent, and verifiable process, subject to the following conditions:

- (1) A cooling-off period of no less than two years must have elapsed since the individual left government service.
- (2) The employment must be approved by the Compliance Committee, which shall consider the necessity, justification, expected benefits, and potential risks.
- (3) A thorough background check and conflict of interest risk assessment must be conducted.
- (4) The individual must not use influence, relationships, or information obtained from their former public office for the benefit of the company and must not engage in any activity involving their former government agency within two years of leaving the position.
- (5) If appointed to a key position—such as a director, executive, or advisor—the company shall publicly disclose the appointment via official communication channels (e.g., annual reports, company website, or corporate publications), clearly stating the individual's name, background, and the rationale for the appointment to ensure transparency.



## **7.8 Conflict of Interest**

The Company requires all personnel to avoid any action that may result in a conflict of interest, whether directly or indirectly. All duties must be performed in a neutral, transparent, and auditable manner, prioritizing the best interests of the Company at all times.

### **7.8.1 Guidelines on Conflict of Interest**

Personnel must not engage in any activities or business that may conflict with or compete against the Company's interests, such as ownership, partnership, consultancy, or private business undertakings that may affect the independence of decision-making or job performance. The use of internal information, Company assets, or business opportunities for personal gain or for the benefit of others, whether directly or indirectly, is strictly prohibited. In cases where there is uncertainty about whether a situation may constitute a conflict of interest, personnel must consult with their supervisors or the Compliance Committee immediately.

### **7.8.2 Disclosure and Recusal**

If a person has a vested interest or close relationship with any individual or activity related to the Company's business, such information must be disclosed transparently to their supervisor or the designated unit, and the person must recuse themselves from any related deliberation, approval, or decision-making processes. Directors and executives are required to report their own interests or those of related persons to the Company Secretary or the designated department, using the prescribed form and channel, within an appropriate timeframe.

### **7.8.3 Review and Approval of Related Transactions**

Any transaction that may potentially result in a conflict of interest or is considered a related-party transaction must be reviewed and screened by the relevant governance bodies, such as the Compliance Committee, Internal Audit, or the Audit Committee. A written opinion must be documented, and the transaction must be submitted for approval in accordance with the Company's internal procedures and delegation of authority to ensure transparency and traceability.

### **7.8.4 Recordkeeping and Monitoring of Conflict of Interest Data**

The Company shall establish appropriate systems for recording and monitoring conflict of interest-related information. All records must be traceable and access-controlled. Personnel are responsible for observing, avoiding, and promptly reporting any situations that may give rise to a conflict of interest to their supervisor or through designated reporting channels. This ensures timely preventive or corrective action can be taken.

#### **7.8.5 Disciplinary Measures and Awareness Promotion**

In cases where a person negligently fails to disclose or deliberately conceals information related to a conflict of interest, such conduct shall be deemed unethical and may undermine the integrity of the organization. The Company may impose disciplinary measures based on the severity of the misconduct. To prevent such risks, the Company will regularly conduct training and internal communication regarding conflict of interest policies to raise awareness and promote a culture of transparency and good corporate governance.

#### **7.8.6 Specific Prohibition on Indirect Benefits via Related Person/Nominee**

The Company strictly prohibits the offering, receiving, or solicitation of any benefits through third-party channels, including family members, close associates, related person, or nominees, for the purpose of bypassing this policy. Company personnel must not use related persons or intermediaries to obtain advantages that would otherwise be considered improper or unethical if received directly.

#### **7.8.7 Appearance of Impropriety**

In addition to avoiding actual conflicts of interest or misconduct, all personnel must exercise caution to prevent any appearance of impropriety. Actions that may be perceived by reasonable third parties as unethical, biased, or improperly motivated—even if not intentionally so—can undermine the Company's integrity and must therefore be avoided.

## **8. Internal Control System and Financial Reporting**

The Company places great importance on having an effective internal control system, accurate financial reporting, and efficient audit processes to support the achievement of organizational objectives, prevent errors, losses, and corruption, and build stakeholder confidence. The Company implements the following measures:

### **8.1 Design of Internal Control Systems**

Each department is required to design an internal control system that is appropriate for the nature of its work. This includes preparing written work procedures or workflows, clearly defining the roles, duties, and responsibilities of all involved personnel, ensuring traceability, and storing such documents in an easily accessible location.

### **8.2 Review and Improvement of Control Processes**

Departmental management must review their procedures and internal control systems at least once a year, or whenever significant changes occur. This ensures continued effectiveness, compliance with laws and Company regulations, and alignment with best practices. Recommendations for continuous improvement should also be made.

### **8.3 Internal Audit and Monitoring**

The Company has established an independent internal audit system. The Internal Audit Unit (or an assigned unit, if no dedicated audit unit exists) is responsible for evaluating the adequacy and effectiveness of internal controls, compliance with anti-corruption policies and measures, and the efficient use of resources. Findings are reported to the Compliance Committee and/or senior management for appropriate corrective action and ongoing improvement.

### **8.4 Financial Control and Accounting Reporting**

The Company has formalized policies for expense approval and financial control, and maintains an accounting documentation system that complies with legal requirements and generally accepted accounting standards. Management is responsible for preparing financial reports that are accurate, complete, up-to-date, and auditable.

The Company strictly prohibits any false or misleading accounting entries or financial reports, manipulation of financial statements, off-the-book accounting, or the use of any accounts to conceal or disguise improper or illegal transactions.

## **8.5 Anti-Money Laundering (AML) and Financial Transparency**

To support the prevention of money laundering and related misconduct, the Company emphasizes financial transparency and clear traceability of transactions. All departments must ensure that financial activities are conducted in compliance with applicable anti-money laundering laws, and that no arrangement is used to obscure the origin, ownership, or flow of funds. Particular attention must be given to identifying Ultimate Beneficial Owners (UBOs), nominee structures, or suspicious transaction patterns that may indicate unlawful

## **9. Human Resources**

To ensure that human resource management aligns with the Company's Anti-Corruption Policy, the Company establishes the following practices:

### **9.1 Human Resource Governance Based on Good Corporate Principles**

The Company implements a human resource management system encompassing recruitment, training, performance appraisal, compensation, promotion, and organizational structuring, reflecting its strong commitment to integrity, transparency, and serious anti-corruption efforts.

During recruitment, the Company assesses candidates' qualifications, work history, and ethical conduct, including any history of corruption or conflicts of interest. All candidates must sign an acknowledgment and acceptance of the Company's Anti-Corruption Policy as a condition of employment.

### **9.2 Integrity and Prohibition of Soliciting Benefits in Recruitment**

Company personnel are strictly prohibited from offering, requesting, or accepting any benefit from job applicants in exchange for selection, interviews, or employment opportunities in any position, regardless of the value or form of the benefit.

### **9.3 Protection of Employees Who Uphold Ethical Standards**

The Company commits to non-retaliation. It will not demote, penalize, or otherwise negatively affect any employee—through loss of benefits, harassment, or unfair evaluations—who refuses to engage in activities that may constitute corruption, even if such refusal affects the Company's business opportunities.

This policy will be communicated to all employees through at least two appropriate channels to ensure widespread understanding and confidence in conducting business with integrity.

### **9.4 Disciplinary Actions and Serious Enforcement of the Policy**

The Company will impose appropriate disciplinary measures on those who violate the policy or anti-corruption practices. Penalties may include verbal warnings, disciplinary actions, termination of employment, or legal prosecution, depending on the nature and severity of the offense. Enforcement will be fair and consistent with Company regulations.

## **9.5 Orientation and Training to Foster Organizational Culture**

New employee orientation must cover the Anti-Corruption Policy, business ethics, company expectations, and consequences of violations.

Additionally, the Company provides regular anti-corruption training for all employees, including directors, executives, and personnel in high-risk positions, to foster understanding, awareness, and practical application in various situations.

## **9.6 Monitoring and Developing the Human Resource Management System**

The Human Resources Department is responsible for monitoring, evaluating, and reviewing HR systems to ensure effectiveness and alignment with governance and anti-corruption best practices.

Revisions to procedures or additional measures may be implemented as appropriate to the organizational context.

Evaluation results and improvement proposals should be reported to senior management to support informed policy decisions.

## **10. Communication**

The Company places great importance on consistently communicating its Anti-Corruption Policy and related practices to all personnel and both internal and external stakeholders through appropriate channels. This aims to foster correct understanding, raise awareness, and encourage cooperation in preventing and combating corruption in all business processes.

### **10.1 Internal Communication**

The Company disseminates its Anti-Corruption Policy to directors, executives, and all levels of personnel through appropriate internal channels such as the intranet, newsletters, bulletin boards, meetings, and training activities, including onboarding programs for new employees and annual training sessions.

Additionally, the Company prepares handbooks and practical guidelines covering high-risk areas such as the giving and receiving of gifts, entertainment and hospitality, sponsorship, donation, political contributions, and conflicts of interest. These resources are easily accessible and used as training materials to foster a transparent organizational culture grounded in ethical business conduct.

### **10.2 External Communication**

The Company communicates its Anti-Corruption Policy and practices to external stakeholders, including customers, business partners, contractors, agents, and other affiliates, through channels such as the company website, business contracts, purchase orders, procurement terms and conditions, and formal policy notification letters.

The communicated content includes corruption-prone topics similar to those addressed internally, to ensure mutual understanding and promote compliance with shared ethical standards.

## **11. Fraud Detection Measures**

### **11.1 Whistleblowing Channels**

The Company has established channels for reporting any suspected bribery, corruption, violations of Company policies, or unethical behavior. These channels cover acts committed by employees at all levels as well as by business partners. Employees and external stakeholders are encouraged to report such matters either with full disclosure of their identity or anonymously. The reporting channels must ensure safety, confidentiality, and protection of the whistleblower, in order to build confidence that no retaliation or adverse consequences will occur as a result of the report. The Compliance Committee is responsible for handling the reports, and whistleblowers may follow up on the status of their report via the same communication channels.

Whistleblowing channels include:

- Email: [CG@ojipaper.co.th](mailto:CG@ojipaper.co.th)

### **11.2 Procedures Upon Receiving a Report**

Upon receiving a whistleblowing report or complaint, the matter will be referred to the Chairperson of the Compliance Committee (Managing Director) within one business day. An initial review will be conducted to assess whether the establishment of an investigation task force is necessary. In cases involving senior management or matters that cause significant damage to the Company, the Compliance Committee shall report the issue directly to the Board of Directors. The outcome of the review shall be summarized and communicated to the complainant within 15 business days.

### **11.3 Whistleblower Protection**

The Company does not require whistleblowers to disclose their identity. All information received will be treated strictly as confidential. The Company places high importance on safeguarding the rights of whistleblowers, ensuring that they are not subject to retaliation, harassment, or any adverse consequences resulting from their report. However, if it is later found that the whistleblower intentionally provided false information, the Company reserves the right to take disciplinary or legal action as appropriate.

## **12. Measures for Responding to Corruption**

### **12.1 Investigation and Fact-Finding**

When a complaint is received or suspected corrupt behavior is identified, the company will conduct a fair, transparent, and unbiased investigation. An appropriate and impartial committee will be assigned to lead the investigation, potentially in collaboration with the Human Resources Department or other relevant departments. The accused shall have the right to explain or present evidence in their defense. Investigation reports will be properly documented and retained for a duration in accordance with legal requirements or internal policies.

### **12.2 Disciplinary Actions**

Any violation of the company's anti-corruption policy constitutes a breach of corporate ethics and disciplinary standards. Disciplinary actions will be imposed based on the severity of the misconduct, including but not limited to verbal or written warnings, suspension, dismissal, or legal proceedings. The company will not penalize employees who refuse to participate in bribery or who report suspected misconduct in good faith. The company also reserves the right to immediately terminate contracts with external parties who breach this policy.

### **12.3 Corrective and Remedial Measures**

In the event of damage caused by corrupt acts, the company will establish a corrective action plan to prevent recurrence and strengthen internal controls. Appropriate compensation or remedies may be considered for affected parties, based on the specific circumstances and in compliance with applicable laws and regulations.

### **12.4 Disclosure of Information**

Disclosure of information related to corruption cases or investigation outcomes shall be handled only by authorized persons or departments. Such disclosure must maintain confidentiality, accuracy, and fairness to all parties involved. Any unauthorized disclosure that results in damage or violates the company's policies may be subject to disciplinary measures or legal action.



### **13. Review, Assessment, and Improvement**

The Company places great importance on upholding ethical standards and the ongoing prevention of bribery and corruption. It mandates a formal review, assessment, and improvement of anti-bribery and anti-corruption practices at least once a year, or whenever significant events or changes occur—such as amendments to laws, internal regulations, or related risk factors—to ensure that practices remain aligned with applicable laws, Group company requirements, and guidelines from the Thai Private Sector Collective Action Against Corruption (Thai CAC).

This review and improvement process is the responsibility of the Compliance Committee, which must present the review findings to the Board of Directors for consideration and approval. If any policies or practices are revised, the Company will ensure that the updated information is communicated to all personnel through appropriate channels.

Additionally, the Company requires that all levels of management actively promote, support, and monitor compliance with this policy within their respective lines of supervision. Non-compliance or violations of this policy shall be deemed a disciplinary offense and may lead to sanctions under the Company's disciplinary regulations, and where applicable, legal action.

