

## **Anti-Corruption Practice Guidelines**

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**Leo Global Logistics Public Company Limited**

## **Anti-Corruption Practice Guidelines**

This anti-fraud and anti-corruption practice guidelines have been established to prevent all forms of corruption and bribery containing clear practice guidelines covering Leo Global Logistics Public Company Limited (the Company)'s business activities, ensuring that business decisions with probable risks of fraud, corruption and bribery are preventive and minimized. Clear measures are set to monitor, audit and assess to strengthen transparent corporate culture with good governance towards sustainable growth, while building trust among all stakeholders.

### **1. Definitions**

“Company” means Leo Global Logistics Public Company Limited (LEO), including persons authorized to act on behalf of the Company.

“Subsidiary Company” means a company whose business is controlled by the Company.

“Business Partner and Supplier” means any person or legal entity that conducts transactions with the Company to support or further promote to generate businesses, consisting of recruitment agencies, brokers, and service providers.

“Fraud and Corruption” means the abuse of authority or position to obtain undue benefits or assets for oneself or others, in any form, whether by offering, promising, giving, committing to give, requesting, or accepting money, property, or any other benefit, directly or indirectly, to or from government officials, public agencies, private entities, or any responsible persons, in order to induce such persons to perform or refrain from performing their duties or to secure business advantages, except where permitted by applicable laws, regulations, rules, local customs, or established business practices.

“Giving and receiving presents or gift items” means the giving and receiving of any item that has monetary value, including assets, substitutes for cash, or items that can be exchanged for goods or services, in order to create a relationship that is within the appropriate scope and value, and in accordance with the custom, tradition, and applicable laws.

“Bribery” means the offer, promise, or giving, covering the solicitation or acceptance of any related benefit, items of value, to induce someone to act or refrain from any action in order to obtain certain benefit or to help achieve a desired outcome by dishonestly, illegally, or in violation of corporate code of conduct. Example of bribery or improper benefits are; giving and receiving gifts items or presents, entertainment, facilitation fees, and giving or receiving support/donations, etc., as a pretext for giving or receiving bribes.

“Entertainment” means the provision of meals or beverages, entertainment activities, reception services, participation in sports or recreational activities, including training, study visits, etc.

“Reception services” means participating in social, cultural, or sporting events with officials or individuals who have or may have favorable business relationships with the Company, etc.

“Employment of Public Officials” means the movement of individuals from the public sector to perform roles in the private sector, or individuals from the private sector undertaking policy-related roles in the public sector, which may pose risks of corruption.

“Giving and receiving support” means giving or receiving money or any benefit for the business or reputation of the Company.

“Giving or receiving donation” means the voluntary provision of resources such as time, money, property, or personnel to an organization or individual to support charitable activities without expecting commercial gain.

“Political assistance” means the provision of monetary value or asset, whether direct or indirect, to support political activities for privileges or business benefits.

“Conflict of interest” means any action that is intended to achieve outcomes or benefits in accordance with the Company's objectives, but instead directly or indirectly benefits oneself or related parties, resulting in the Company not receiving optimal benefits or potentially suffering harm.

“Facilitation payment” means small, unofficial payments to government official(s) to facilitate or expedite routine actions or processes that such officials are already obligated to perform, or where such actions do not require the officials' discretion and are considered as part of their lawful duties.

## **2. Scope**

This practice guideline is applicable to all directors, executives, staff, and employees of the Company and its subsidiaries.

## **3. Practice Guidelines**

All directors, executives, employees, and staff of the Company and subsidiaries are prohibited from soliciting, engaging in, or accepting any form of fraud, corruption or bribery, directly or indirectly, whether as the giver or receiver, for the benefit of the organization, themselves, their families, friends, acquaintances, or for business purposes. These practice guidelines cover the types of fraud, corruption and bribery, as follows:

### 3.1 Giving and Receiving Gifts and Entertainment

The Company has a policy prohibiting directors, executives, employees, and staff of the Company and subsidiaries from soliciting, accepting, or giving gifts, entertainment, or any other benefits that are not in accordance to the Company's regulations. The aim is to ensure that the giving and receiving of gifts and entertainment are transparent and are not for personal gain or reciprocal benefit. The practice guidelines are as follows:

- 1) **Acceptance of gifts**, both from private entities and government officials, must be reasonable, transparent, and in accordance with customary practices and appropriate occasions. The value of such gift must not exceed THB 3,000 (three thousand Baht) per occasion. Where the value exceeds THB 3,000, the recipient must report to their supervisor and obtain approval from the authorized approver in accordance with the Delegation of Authority (DOA), for consideration of donation or other appropriate handling.
- 2) **Giving gifts** must be reasonable, transparent, appropriate to customary practices and occasions, and aligned with legitimate business purposes.
- 3) **Entertainment and Hospitality**: Employees providing hospitality must obtain expense approval from the authorized approver in accordance with the Delegation of Authority (DOA), and such hospitality must be provided only as necessary and appropriate.

### 3.2 Giving or Receiving Donations

The giving or receiving of monetary donations, goods, or any other contributions for charitable purposes must be carried out on behalf of the Company, in a transparent manner with proper documented evidence, and in compliance with company regulations. Such contributions must not be used as a pretext for bribery. Notably, the approval of the donation amount must be in accordance with the Company's DOA and must be ensured that such actions are not used as a means of fraud & corruption.

- 1) The requesting entity shall provide details of the charitable contribution or sponsorship request, including supporting evidence of the donation. Such matter must be carried out under the Company's name and reviewed by the direct supervisor before being submitted for approval by the authorized approver.
- 2) The authorized approver shall review the details of the donation request to ensure that the purpose of the donation is in line with the Company's guidelines.
- 3) The requesting entity must submit proof of charitable donation to the accounting department as evidence after the transaction has been completed, such as a thank-you letter from the recipient entity, photographs, or official receipts, etc.
- 4) The Account Department shall verify the supporting documentation of the charitable contribution. If the documentation provided is insufficient, the requesting entity shall be notified for additional information or clarification.

### **3.3 Giving or Receiving Support**

Giving or receiving support, whether in the form of monetary support, goods, or any other support for charitable purposes or company activities, must be carried out on behalf of the Company, in a transparent manner with proper documented evidence, and in compliance with company regulations. It must not be used as a pretext for giving or receiving bribes. Approval of support amounts must be in accordance with the Company's DOA. The Company will present the matter to the authorized director for signature and approval, on a case-by-case basis. It must be ensured that such action is not used as a pretext for corruption and is truly carried out to support the project's objectives towards success and benefit the communities as well.

- 1) The provision of support must demonstrate that any financial support or any other quantifiable benefits are not related to any reciprocal benefit given to any individual or entity, except for customary business recognition.
- 2) The requesting entities shall provide details of the disbursement request and supporting documentation of sponsorship, and shall ensure that such matter is carried out on behalf of the Company. This must be screened and reviewed by the direct supervisor before being submitted for approval by the authorized approver.
- 3) The authorized approver will review the details of the disbursement request to ensure that the purpose of the support is in line with company practices.
- 4) The requesting entities shall submit evidence of support to the accounting department after the transaction, such as a thank-you letter from the recipient organization, photographs, or official receipts, etc.
- 5) The accounting department will review the supporting document. If the evidence submitted is insufficient, the requesting entity shall be notified for additional information or clarification.

### **3.4 Political Support**

The Company maintains political neutrality and shall not use company funds or resources to directly or indirectly support any political party, candidate, or political activity. However, the directors, executives, employees, and staff of the Company and subsidiaries have the freedom to participate in or support political activities independently in their personal capacity, provided that such activities do not affect their working hours and duties. They must not use the Company name or their association with the Company or its subsidiaries in exercising their political rights.

### **3.5 Conflict of Interest**

The Company's Board of Directors has established a policy regarding the prevention of conflicts of interest based on the principle that any business decision must be made in the best interest of the Company and its shareholders and shall avoid actions that may create conflicts of interest. The Company specifies that those involved in or has interests in the transaction under

consideration must inform the Company Secretary of their relationship or interest of such transaction. Such Individual must not participate in the consideration process of such matter, and shall have no authority to approve the transaction.

### **3.5.1 Management**

The Company shall comply with the requirement of The Stock Exchange of Thailand (SET). The management must carefully consider conflicts of interest regarding related party transactions between the Company and subsidiaries with integrity, reasonableness, and independence, within the framework of good ethics, and prioritizing the Company's best interests to ensure that such transactions are reasonable and primarily in the Company's best interests. The types of transaction framework that are likely to generate conflicts of interest consists of:

- 1) Transactions between the Company and directors, executives, major shareholders, or individuals/legal entities related to the Company's executives, which may result in terms that are not in line with market conditions and may create favoritism for certain parties, such as hiring a transportation company in which a director or executive has an interest, etc.
- 2) Approval of procurement or appointment of positions without following the proper selection procedure
- 3) Accepting or giving gifts, money, or any other benefits from business partners, suppliers, or service providers beyond the scope set by the Company
- 4) Using company's resources or information for personal benefit or for the benefit of others
- 5) Holding positions or roles in businesses that may be competitors, business partners, or suppliers of the Company

### **3.5.2 Employees**

- 1) Employees shall avoid any action that can create a conflict of interest in the Company, whether from contacting with the Company's business partners, suppliers, customers, competitors, or from using opportunities or information obtained from employment position for personal gain, or from engaging in business that competes with the Company.
- 2) Employees shall not work for any other entities or organizations that provide compensation during the Company's working hours, unless prior authorization in writing by the Chief Executive Officer (CEO) or a person designated by the CEO.
- 3) Employees must safeguard the Company's interests to the best of their ability.

- 4) Employees must not engage in any other actions that can create conflicts of interest with the Company, whether directly or indirectly.
- 5) Employees must not get involved in any other business activities that may have adversely impact on the Company's interests or compete with the Company.

### **3.6 Facilitation Payments**

Facilitation payments are strictly prohibited. The Company has no policy of paying facilitation fees in any form, whether directly or indirectly. Directors, executives, employees, and staff of the Company and its subsidiaries shall not engage in any activity in exchange for facilitating business operations.

### **3.7 Employment of Public Officials**

The Company's employment of public officials who still hold positions in the public sector is prohibited from being carried out in positions that may create conflicts of interest. In such case, the appointment process must be transparent, including the disclosure of relevant background information as former public official appointed as director/executive of the Company or its subsidiaries. The rationale of the appointment of such person shall be disclosed in the Company's public documents.

### **3.8 Policy across Group of Companies, Business Representatives, Business Partners, and Suppliers**

#### **Group Companies**

The Company will inform its subsidiaries and companies under its control regarding the Anti-corruption policy for implementation and compliance with the Anti-corruption policy and practice guidelines, and to acknowledge the requirements for compliance with such policy.

#### **Business Representatives, Business Partners, and Suppliers**

The Company will disseminate knowledge and develop understanding among business representatives, business partners, suppliers, or external parties involved in the Company's business to keep them informed of best practice guidelines in accordance with the Anti-corruption policy. The Company's units that have contacts with the aforementioned individuals must communicate and explain to these individuals or legal entities, such as government officials, foreign government officials, officials of international organizations or private entities, whose duties are related to the Company or may have influence that may have impact on the Company, regarding the compliance with the Anti-corruption policy and practice guidelines.

### **3.9 Procurement**

The Company's procurement processes must be conducted in a transparent manner and in full compliance with applicable law, as well as regulations related to procurement in both the public and private sectors, including rules and regulations issued by the National Anti-Corruption Commission (NACC).

In addition, the Company shall also assesses the risks of the business partners and suppliers in terms of environmental, social, and governance (ESG) aspects, covering issues such as fraud & corruption, human rights, and climate change, to ensure that operations throughout the value chain are aligned with the Company's policies and good practices in anti-corruption and best practice guidelines.

### **3.10 Human Resource Management**

The Company has a policy not to demote, punish, or impose any adverse consequences on directors, executives, and employees who refuse to engage in corruption, even if such actions result in the Company losing business opportunities.

#### **3.10.1 Training**

- 1) All directors, executives, employees, and staff of the Company and its subsidiaries shall receive training or shall be informed about anti-fraud and corruption measures to ensure awareness of this policy, including whistleblowing and complaint procedures concerning fraud & corruption. This shall be part of the orientation program for all newly appointed directors, executives, and employees, as well as ongoing annual training for all company personnel.
- 2) Regularly review the understanding of the policy and best practice guidelines and the Company's expectations, including the penalties for non-compliance with related measures, at least once a year.

#### **3.10.2 Communication**

The Company shall communicate the anti-corruption policy and practice guidelines to all directors, executives, employees, and staff of the Company and its subsidiaries, business representatives, business partners, and suppliers purposely to build knowledge, understanding and raise awareness of anti-fraud and corruption. The Company shall carry out the followings:

- 1) The Company shall communicate the anti-corruption policy through its communication channels such as e-mail, the Company's intranet system, official LINE account, annual reports, orientation programs, and employee training, etc. The content will

cover the essential aspects of the policy and practice guidelines, including bribery, giving or receiving gifts/entertainment events, facilitation payments, giving or receiving charitable contributions, giving or receiving sponsorships, and whistleblowing channels, etc.

- 2) The Company shall communicate the penalties for non-compliance with the anti-corruption policy and practice guidelines as well as the policy of not demoting, penalizing, or imposing adverse consequences directors, executives, and employees who refuse to engage in fraud and corruption, even if such actions result in losing business opportunities for the Company and its subsidiaries.

### **3.11 Due Diligence of Stakeholders**

**3.11.1** The Company conducts background checks of the candidates prior to the employment purposely to verify their qualifications, suitability, and experience of job applicants, as well as information regarding past involvement in corruption or bribery.

**3.11.2** The Company conducts background checks of the personnel before assigning them to key positions within the Company purposely to examine their qualifications, experience, financial credibility, references, or probable conflicts of interest that may arise when holding the new position.

**3.11.3** The Company conducts background checks of other individuals who will conduct business transactions with the Company, particularly vendors and service providers, purposely to verify their credibility, financial status, reputation, and qualifications related to the products or services, as well as information regarding past involvement in corruption or bribery. In addition, the Board of Directors and executives as defined and specified in the Capital Market Supervisory Board (CMSB)'s announcement must also report their conflicts of interest using the specific form to the Company Secretary within the specified timeframe, annually, and when changes occurred.

## **4. Whistleblowing Procedures**

The Company has set up procedures for whistleblowing or submitting complaints regarding fraud and the investigation process. Details are specified in the Whistleblowing Policy and Guidelines.

**The designated recipients of complaints or channels for reporting corruption are:**

Chairman of the Board of Directors and Independent Directors.

Channels for receiving whistleblowing or complaints regarding fraud and corruption: Individuals wishing to file a complaint can submit the inquiry via any of the contact persons and channels as shown below:

- 1) Directly, verbally or in writing
- 2) Via email: [whistleblowing@leogloballogistics.com](mailto:whistleblowing@leogloballogistics.com)
- 3) On the Company website: [www.leogloballogistics.com](http://www.leogloballogistics.com), under the Whistleblowing section
- 4) By letter to the authorized representative, to be addressed to:  
Chairman of the Board of Directors and Independent Directors  
Leo Global Logistics Public Company Limited  
251-251/1 Soi Pakdee, Rama 3 Road  
Bangkorlaem, Bangkok 10120, Thailand
- 5) If the complainant chooses not to disclose his/her name, he/she must provide clear and sufficient factual details or evidence demonstrating reasonable grounds to believe that fraudulent acts or violations of laws, regulations, company regulations, or the Company's code of ethics have occurred.

Complaints will be kept confidential, and complainants may file complaints through more than one channel. Disclosure of the complainant's identity is not required. If the complainant's identity is disclosed to the Company, it will enable the Company to provide updates of the investigation results or further details of the complaint.

**Persons Eligible to Report Whistleblowing or Complaints regarding Fraud and Corruption:**

Individuals who can file whistleblowing or complaints regarding fraud, corruption and bribery are from all groups of stakeholders of the Company consisting of shareholders, customers, business partners, suppliers, business competitors, creditors, executives, and employees. Regardless of the method of reporting, the Company shall strictly maintain confidentiality.

**Fact-Finding Procedure**

In conducting investigations and gathering facts, the recipient of the complaint shall submit the complaint to the following individuals to act as the investigator and fact-gatherer ("**Investigator**") as requested:

- 1) If the complainant is an employee holding position below the Chief Executive Officer (CEO):  
The CEO and/or a person or unit designated by the CEO shall act as the Investigator.
- 2) If the complainant is an employee at the level of Chief Executive Officer or higher:  
The Audit Committee and/or a person or unit appointed by the Audit Committee shall act as the Investigator.

In this case, the Investigator can invite any employee to provide information or request the submission of any relevant documents for fact-finding investigation.

3) If the complainant is a stakeholder or external individual:

The Audit Committee and/or a person or unit appointed by the Audit Committee shall act as the Investigator, criteria in sections 1) or 2) shall be implemented as practice guidelines.

Notably, the Company will acknowledge receipt of the complaint or whistleblowing and confirm receipt within 15 business days. Furthermore, the Company will also proceed with the fact-finding investigation, or resolve the issue within a total timeframe of 30-60 days, depending on the severity, impact, and urgency of the complaint. The Company shall notify the complainant or whistleblower of the results of the fact-finding investigation or the progress within 7 days counting from the day of the conclusion of the complaint or whistleblowing. The results shall be reported to the Company's Board of Director upon completion of the investigation.

## **5. Penalties**

If the investigation reveals the complaint to be true, the Company shall proceed as follows:

1) In cases where the complaint involves fraudulent acts, the Investigator shall consider submitting the complaint, along with the assessment, to the Audit Committee for further consideration.

2) In cases where the complaint is of great importance, such as affecting the Company's reputation, image, or financial standing, conflicting with the Company's business policies, or involving with senior management, etc., the Investigator shall consider submitting the matter, along with the assessment, to the Board of Directors for further consideration.

3) In cases where the complaint causes damage to any individual, it is possible for the Investigator to propose appropriate and fair remedies/compensation to the impacted person as deemed suitable.

4) If the violation or non-compliance with the policy constitutes an illegal act, the wrongdoer shall be subject to the penalties prescribed by law.

5) Civil and/or criminal proceedings shall be considered and determined by the Audit Committee. The Company considers fraud and/or unlawful conduct as serious offenses and shall pursue legal action, both civil and criminal, to the fullest extent without negotiation or settlement in any case.

6) The decision on disciplinary actions made by the Chief Executive Officer or the Audit Committee shall be considered as final.

7) The Company will not demote, punish, or impose any adverse consequences on directors, executives, and employees who refuse to engage in fraud and corruption, even if such actions result in a loss of the Company's business opportunities.

8) Any agents, business intermediaries, business partners, or suppliers of the Company who violate this Policy, or who are aware of the actions that are contrary to this Policy but fails to report such actions to

the Company's management, or who provides false information when interviewed by Company investigators regarding potential violations, may have their contract(s) terminated.

However, if the Company's investigation reveals a "false complaint" and the false complainant can be identified, the Company shall consider taking the following actions:

- **If the false complainant is a company executive or employee:** That person will face penalties according to Company's rules and regulations, or as specified by law.
- **If the false complainant is an external individual:** The Company will proceed as specified by law.

## **6. Corrective Actions and Prevention of Recurrence**

Upon completion of the investigation, the investigation committee and relevant management team will jointly consider corrective measures for the fraud incident in order to improve or adjust the policy, the internal control system, the work process, including pursuing civil and/or criminal litigation, as well as expanding the investigations to identify other probable related areas of fraud. Corrective measures are applied for each specific case. Action Plan for the corrective measures will be formulated with a clear timeframe for the implementation, The plan shall be presented to the Company's top management and specific corrective measures will be implemented as approved accordingly to prevent recurrence.

## **7. Risk Assessment**

The Company shall assessed all types of corruption and bribery risks identified in the Anti-corruption policy. The scope of the assessment covers all operations of the Company and the new business partners, specifying risk measurement criteria in terms of both impact and likelihood of occurrence. Corrective action guidelines and preventative measures are established to minimize future risks, particularly those of high-risk issues, ensuring that risks are at an acceptable level and are managed promptly. Moreover, the results of the risk assessment shall be reported to the Company's Board of Directors at least once a year.

## **8. Internal Controls**

The Internal Control is considered a fundamental tool for the Company in preventing corruption within the operational processes of all departments. The Company has set up the audit processes and internal control system to prevent fraud and corruption and to ensure that the established risk management system supports the achievement of the Company's objectives. In addition, the Company has also developed the Internal Audit system in compliance with applicable laws, regulations, and anti-corruption requirements, covering the following issues:

1) Arrange audits to be conducted by the internal audit units regularly every year.

2) Protect whistleblowers or complainants in all fairness, and protect employees or other individuals who report or provide evidence of fraud and corruption related to the Company, including employees who deny corruption. This will be achieved through measures to protect whistleblowers or those who cooperate in reporting fraud and corruption, as specified in the whistleblowing policy and practice guidelines.

3) Prepare audit and internal control reports for the Audit Committee regularly.

#### **9. Monitoring/Assessment Guidelines of Anti-Fraud and Corruption Policy Compliance**

The Company regularly monitors and assesses compliance with the Anti-corruption policy on an annual basis. Various channels are used to communicate the Anti-corruption policy to encourage employee participation enterprise-wide, such as e-mail, intranet, and the Company LINE account, etc. New employees are required to acknowledge this Policy during orientation session. Moreover, compliance with the anti-corruption policy is subject to annual monitoring and assessment.

#### **10. Review and Update of Anti-Fraud and Corruption Policy and Practice Guidelines**

The Company shall review the Anti-Corruption Policy and Practice Guidelines and report the results of policy implementation to the Board of Directors at least once a year to ensure that the Policy and Practice Guidelines remain in compliance with applicable regulations and laws.

This Anti-Corruption Practice Guidelines document is effective from May 18, 2026, as approved by the Executive Committee Meeting No. 7/2026.

*-Signature-*

(Mr. Kettivit Sittisoontornwong)

Chief Executive Officer

Leo Global Logistics Public Company Limited