

## **Anti-Corruption Policy**

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**Leo Global Logistics Public Company Limited**

## Anti-Corruption Policy

This anti-corruption policy has been established to prevent all forms of corruption and bribery. It provides a clear framework of guidelines covering all of 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. There are transparent measures to monitor, audit and assess purposely to strengthen transparent corporate culture with good governance towards sustainable growth, while building enduring trust among all stakeholders.

### 1. Scope

This policy is applicable to all directors, executives, employees, and staff of the Company and its subsidiaries. Detailed guidelines for the implementation of this policy are provided in the official Anti-corruption guidelines.

### 2. Duties & Responsibilities

**2.1 The Board of Directors** holds the responsible to approve the Anti-corruption policy, while governing and overseeing the Corporate operations to ensure compliance with the set policy, covering all forms, types and components of fraud, corruption and bribery.

**2.2 The Sub-committees consist of:**

- **The Audit Committee**, entrusted with the following oversight duties to:

- Review the efficiency, adequacy, and appropriateness of internal control frameworks and internal audit systems.
- Consider whistleblowing and verify facts regarding fraud and corruption, and consider penalties, remediation plans, and preventive measures.
- Review and approve internal audit plans regarding fraud and corruption risks in Corporate operations.
- Prepare internal audit reports related to anti-corruption, and report the results to the Board of Directors at least once a year.

- **The Corporate Governance and Sustainability Committee:** The duties are to specify and review policies and practices related to governing and overseeing the businesses in the environmental, social, and governance (ESG) aspects, covering anti-corruption issues, as well as overseeing and monitoring performance to ensure compliance with the Company’s set policies and goals.

### **2.3 The Working Groups** consist of:

**- The Risk Management Working Group**, responsible for the following actions:

- Assess all types of fraud and corruption risks, including various forms of bribery as specified in the Anti-Corruption Policy. The scope of the risk assessment covers the Company's operations as well as the operations of new business partners.
- Specify corrective actions and preventive measures against repetitive fraud cases to minimize probable risks in the future, especially in high-risk cases.
- Monitor performance to ensure that the Company manage risks at an acceptable level.
- Report the results of risk assessments and fraud & corruption risk management to the Board of Directors at least once a year.

**- The Anti-Corruption Working Group**, responsible for the following actions:

- Monitor changes in laws and regulations related to anti-corruption.
- Review anti-corruption policies and practice guidelines, and present to the Corporate Governance and Sustainability Committee, for approval by the Board of Directors, at least once a year.
- Communicate the anti-corruption policy among subsidiaries, associated companies, company directors, executives, employees, shareholders, customers, business partners, suppliers, and stakeholders.
- Conduct training and disseminate knowledge concerning anti-corruption on a regular basis
- Conduct fact-finding and investigation fairly, implement corrective and remedial measures for affected Parties, as well as preparing annual summary of whistleblowers, complaints, and remediation results for presentation to the Corporate Governance and Sustainability Committee.
- Hold meetings at least once a year, or when necessary, and report the operational outcomes results to the Corporate Governance and Sustainability Committee.

**2.4 The Procurement Department** has the duties to review and examine the background of business partners and suppliers, especially newly onboarded vendors, business partners, suppliers, and service providers, in order to verify their reliability, financial status, reputation, and qualifications related to goods or services. The Department has to review and examine information regarding past corruption cases of prospective business partners and suppliers whom expecting to conduct business with the Company, and assess the risk of fraud, corruption and bribery in accordance with the Company's policies and guidelines, purposely to specify appropriate control measures based on the level of risks.

**2.5 Company employees** have the duty to comply with the company's anti-corruption policies and practice guidelines.

**2.6 The Internal Audit Department** has the duty on an annual basis to audit internal operations, ensuring strict compliance with policies and practice guidelines regularly every year, and that the Company has an effective internal control system to prevent and minimize probable fraud and corruption risks. The audit report will be present to the Audit Committee at least once a year.

### **3. Framework of Practice Guidelines**

All directors, executives, employees, and staff of the Company and its subsidiaries are prohibited from soliciting, engaging in, or accepting any form of fraud, corruption or bribery, directly or indirectly, whether as giver or receiver, for the benefit of the organization, themselves, their families, friends, acquaintances, or any business advantages. The Company has set up standardized framework of practice guidelines that all directors, executives, employees, and staff of the Company and subsidiaries must follow strictly, covering the following types of fraud, corruption, and bribery:

**3.1 Giving or Receiving Gifts and Entertainment:** The Company has a No gift policy directors, executives, employees, and staff of the Company and subsidiaries are prohibited from soliciting, accepting or offering gifts, entertainment, or any other benefits that do not comply with the Company's regulations.

**3.2 Giving or Receiving Donations:** Giving or receiving donations in the form of money, goods, or other funds for charitable purposes must be transparent, documented, and in compliance with the Company's regulations. In the case that donations significant high value, require formal sign-off and approval from an authorized director, to be considered on a case by case basis.

**3.3 Giving or Receiving Support:** Giving or receiving support, money, goods, or other funds for charitable purposes must be transparent, documented, and in compliance with the Company's regulations. In the case that the support's significantly high value, require formal sign-off and approval from an authorized director, to be considered on a case by case as basis.

**3.4 Political Support:** The Company maintains political neutrality. 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 they do not use the name or their relationship with the Company or subsidiaries to express their personal political rights.

**3.5 Conflict of Interest:** The Company's Board of Directors has set up policies and practice guidelines regarding the prevention of conflicts of interest based on the principle that any decision in conducting business activities must be in the best interest of the Company and

shareholders, and should avoid actions that create conflicts of interest. The Company specifies that those involved in or with vested interests in the transaction under consideration must formally disclose to the Company Secretary of their relationship or vested interest in the transaction and must not participate in the consideration of such matter, not having the authority to approve such transaction.

**3.6 Facilitation Payments:** The payment of facilitation fees is prohibited. The Company has no policy of paying facilitation fees in any form whatsoever, whether direct or indirect.

**3.7 Employment of Government Officials:** The Company's employment of current government employees who still hold positions in the public sector is prohibited from being carried out in positions that create conflicts of interest. In such case, the appointment process must be transparent, with disclosure of information and personal history of such former government official appointed as director/executive of the Company or subsidiaries. The reasons for the appointment of such person shall be stated in the Company's public disclosures.

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

- The Company will inform subsidiaries and companies under control regarding the Anti-corruption policy in order for them to implement such policy and practice guidelines, and to realize the requirements for compliance with such policy.
- The Company will disseminate knowledge and develop understanding among business representatives, business partners, suppliers, or external parties involved in the Company's business to inform them of best practice guidelines in accordance with the Anti-corruption policy.

**3.9 Procurement:** The Company's procurement processes must be transparent and in compliance with the law, as well as regulations related to procurement in both the public and private sectors. In addition, the Company also assesses the risks of the business partners and suppliers in terms of environmental, social, and governance (ESG Risk) aspects, covering issues of fraud & corruption, human rights, and climate change, to ensure that the Company's operations throughout the supply chain acknowledge and comply with the Anti-corruption policy.

**3.10 Human Resource Management:** The Company has a policy not to demote, punish, or negatively impact directors, executives, and employees who refuse to engage in corruption, even if such actions result in loss of business opportunities for the Company. The Company focuses on communicating, keeping everyone well-informed, and provide training regarding anti-corruption policy, measures and how to report whistleblowing or file complaints. The Company

has scheduled a review for better understanding, Company expectations, and penalties for non-compliance with related measures, at least once a year.

**3.11 Stakeholder Background Checks:** The Company has arranged to conduct background checks for all candidates to verify their qualifications, suitability, experience, and any information regarding applicants' past record of fraud and corruption.

#### **4. Whistleblowing Procedures**

The Company has set up formal channels for whistleblowing or submitting complaints by all stakeholders regarding fraud, including an investigation process. Details are specified in the Whistleblowing Policy and Guidelines.

Significantly, complaints will be treated with utmost confidentiality, and complainants can submit complaints through more than one channel. Disclosure of identity is not required. If disclosing the identity to the Company, it will enable the Company to legally provide updates on the investigation outcomes and progress.

#### **5. Penalties**

If the complaint is validated, the Company will implement remediation procedures for affected parties and penalize the wrongdoer in compliance with the Company's rules and regulations, or as specified by law.

However, if the Company discovers a "false complaint" and can identify the false complainant, the Company will take 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 and Preventive Measures**

Upon completion of the investigation, the investigation committee and relevant management team will jointly consider corrective actions 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 actions are applied for each case. Action Plan for the corrective actions will be formulated with a timeframe for the implementation, to be presented to the Company's top management for approval to prevent any recurrence.

## **7. Risk Assessment:**

The Company has assessed all types of corruption 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 actions and preventative measures are indicated to minimize probable risks in the future, particularly in high-risk issues, ensuring that risks are at an acceptable level for the organization 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 Company has set up the audit process and internal control system to prevent corruption in accordance with relevant anti-corruption regulations and to ensure that the set risk management system helps achieve the set goals, by means of arranging regular annual audit process conducted by the Internal Audit Department, protecting whistleblowers and complainants, and reporting & submitting the audit results and internal control performance to the Audit Committee on a regular basis.

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

The Company monitors and assesses the compliance with the Anti-corruption policy annually. 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. New employees are trained regarding the policy during the orientation session. Compliance with the anti- corruption policy is monitored and assessed regularly every year.

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

The Company shall review the Anti-Corruption Policy and shall report the results of the policy implementation audit to the Board of Directors at least once a year to ensure that the Company's Anti-Corruption Policy complies with other applicable regulations and laws.

This Anti-Corruption Policy is effective from May 15, 2026, as approved by the Board of Directors Meeting No. 3/2026.

*-Signature-*

(Mr. Sanee Dangwang)

Chairman of the Board of Directors

Leo Global Logistics Public Company Limited