

Conflict of Interest Policy

Leo Global Logistics Public Company Limited

Conflict of Interest Policy

The Board of Directors of Leo Global Logistics Public Company Limited (“**the Company**”) has set up the Conflict of Interest (COI) Policy based on the principle that any decision in conducting business activities must be made in the best interest of the Company and its shareholders. Any actions that may lead to conflicts of interest should be avoided. Any related person or stakeholder involved in any transaction under consideration is required to disclose such relationship or interest to the Company Secretary, abstain from participating in the consideration process, and shall not have any authority, whether directly or indirectly, to approve the transaction. The Company strictly comply with all applicable laws, regulations, and guidelines of the Securities and Exchange Commission (SEC) and the Stock Exchange of Thailand (SET), particularly those concerning related party transactions, disclosure, and approval of transactions for listed companies. This is to ensure that all transactions are conducted transparently, fairly, taken into consideration the best interests of the Company and stakeholders ultimately.

1. Scope

This policy apply to all directors, executives, staff, and employees of the Company and subsidiaries. This policy has been approved by the Board of Directors and in effect from the date the Board of Directors passed the resolution to approve this Conflict of Interest (COI) Prevention Policy. Details of the practice guidelines for this Policy are specified in the Conflict of Interest (COI) Prevention Policy practice guidelines document.

2. Duties and Responsibilities

2.1 The Board of Directors has the duties to approve the Company’s COI Policy, govern and oversee to ensure that the implementation is in accordance with the set policy.

2.2 The Sub-committees consist of:

- **The Audit Committee**, with the duties to:
 - Examine the efficiency, adequacy, and suitability of the internal control and internal audit systems.
 - Investigate the whistleblowing and verify facts regarding conflicts of interest, and consider penalties, solution and remedy guidelines, including preventive measures to prevent recurrence.
 - Review and approve internal audit plans regarding COI risks.
 - Prepare internal audit reports related to conflicts of interest and submit the results to the Board of Directors at least once a year.
- **Corporate Governance and Sustainability Committee**, with the duties to specify and review the policies and practice guidelines related to the governing and overseeing of environmental, social, and governance (ESG) aspects that cover the issues of conflict of interest, human rights, and climate change, as well as

overseeing and monitoring the implementation to ensure compliance with the Company's set policies and goals.

2.3 The Working Group, consisting of:

- **The Risk Management Working Group**, with the duties to

- Assess conflict of interest risks, with the scope of the risk assessment covering the Company's operations and the operations of new business partners.
- Specify corrective actions and preventive measures to minimize probable future risks, particularly in high-risk issues.
- Monitor performance to ensure that the Company can manage risks at an acceptable level.
- Report the results of the risk assessment and COI management to the Board of Directors, at least once a year.

- **The Anti-Corruption Working Group**, with the duties to

- Monitor changes regarding laws and regulations related to COI prevention.
- Review conflict of interest policies and practices guidelines, to be presented to the Corporate Governance and Sustainability Committee, and to be considered and approved by the Board of Directors, at least once a year.
- Communicate the COI Policy among subsidiaries, associated companies, directors, management team, employees, shareholders, customers, business partners, suppliers, and stakeholders.
- Conduct training and communication on COI prevention regularly.
- Conduct fair fact-finding and investigation, implement corrective and remedial measures for those affected, as well as preparing a summary of whistleblowing, complaints, and remedies to be presented to the Corporate Governance and Sustainability Committee, once a year.
- Hold meetings at least once a year or as necessary and report the implementation results to the Corporate Governance and Sustainability Committee.

2.4 The Procurement Department shall examine the background of business partners and suppliers, especially new service providers, to verify their reliability, financial status, reputation, and qualifications related to goods or services. In addition, the Department shall also examine information regarding COI and **assess the COI risks in accordance with the policy and practice guidelines, in order to specify appropriate control measures based on the risk level of business partners and suppliers.**

2.5 The Company Employees shall comply with the COI Policy.

2.6 The Internal Audit Department has the duty to audit internal operations to ensure strict compliance with policies and practice guidelines regularly every year, to ensure that the Company has an efficient internal control system in order to prevent and minimize probable COI risks. The Department shall present the report of the audit results to the Audit Committee at least once a year.

3. Framework for Practice Guidelines

3.1 Management Team

The Company shall comply with the regulations of The Stock Exchange of Thailand. The Management is required to carefully consider COI regarding related party transactions between the Company and its subsidiaries with honesty, integrity, independence and sound judgment, within the framework of good corporate governance, prioritizing the Company's best interests, purposely to ensure that such transactions are reasonable and mainly in the Company's best interests.

3.2 Employees

Employees shall avoid any action that may lead to a conflict of interest for the Company, directly or indirectly, whether arising from contacts with the Company's related business stakeholders such as business partners, suppliers, customers, competitors, etc., or arising from taking opportunities or information obtained from being an employee for personal gain or arising from conducting business that competes with the Company.

3.3 Approval Workflow for RPT/Connected Transaction, covering the following processes:

- 1) Screening to detect related party transactions (RPTs)**
- 2) Approval Governance criteria**
- 3) Follow-up and review of post-approval**
- 4) Approval of RPTs** in accordance with applicable laws and/or regulations

3.4 Reporting Conflicts of Interest

- 1) Report upon starting employment, or changing positions, or annually, by completing the COI Declaration form.
- 2) Report immediately (within 7 working days) when incidents occur, such as a relative starting to do business with the Company or receiving an unusual offer of gifts/benefits, etc.
- 3) The Compliance Department shall prepare a summary report for the Management and the Audit Committee.

4. Whistleblowing

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

Notably, all complaints will be kept confidential, and complainants can submit complaints via more than one channel. It is not necessary to disclose identity. If disclosing the identity to the Company, it will enable the Company to legally provide updates on the investigation outcomes or further details on the complaints.

5. Penalties

If the complaint is found to be true, the Company will implement its 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 consider the following actions:

- **If the false complainant is a Company executive or employee:** That person will face penalties according to the 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. Measures for Monitoring, Verification, Remedial Actions, Recurrence Prevention, and Reporting

The Company regularly monitors and assesses compliance with the COI policy, and prepares summary of COI reports, related party transactions, and related complaints to be submitted to the Audit Committee and the Board of Directors at least once a year for continuous oversight and system improvement.

Moreover, after the investigation is completed, the investigation committee and management team from relevant departments will jointly consider corrective measures for the incident 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 case. Action Plan for the corrective measures will be formulated with a timeframe for the implementation, and presented to the Company's high-level management. Specific corrective measures will be implemented as approved accordingly to prevent recurrence.

7. Internal Control

The Company has set up the audit process and internal control system to prevent conflicts of interest. The audit process shall be conducted by the Internal Audit Department, and the audit report shall be submitted to the Audit Committee at least once a year.

This Conflict of Interest (COI) Policy is effective as of May 15, 2026. The Company will review this Policy at least once a year, and will audit and monitor results. The results will be presented to the Board of Directors for consideration and approval.

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(Mr. Sanee Dangwang)

Chairman of the Board of Directors

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