




PRTR Group Public Company Limited.

Anti-Corruption Policy.



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This Anti-Corruption Policy is the copyright of PRTR Group Public Company Limited (the “Company”), reflecting our commitment to developing a corporate governance system aligned with the principles of good governance, best practices, and the laws, rules, and regulations of relevant regulatory authorities.

The Board of Directors approved this Anti-Corruption Policy during Meeting No. 4/2019 on November 21, 2019, to serve as the core principle and operational guideline for executives, employees, and relevant stakeholders of the Company and its subsidiaries, effective from December 1, 2019, onwards.

To ensure that the Anti-Corruption Policy remains current and appropriate for evolving situations and changes, it shall be reviewed at least once a year. Any amendments or revisions must be approved by the Board of Directors only.



(Mr. Niphon Bundechanan)
Acting Chairman of the Board of Directors.




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1. Introduction.

Operating in a competitive business environment requires transparency, fairness, and equitable treatment. No unethical channels or corrupt practices shall be utilized to gain an unfair advantage. The Company prioritizes cautious business operations by actively promoting and emphasizing anti-corruption throughout the organization, while strictly adhering to the principles of good corporate governance. Consequently, this Anti-Corruption Policy has been established to serve as the core principle and operational guideline.


2. Objectives.

1. To establish a standardized Anti-Corruption Policy for the Company and its subsidiaries, ensuring consistent implementation and alignment across the group.
2. To serve as a formal written communication tool for conveying the Anti-Corruption Policy to personnel at all levels within the Company and its subsidiaries, fostering a shared and accurate understanding.

3. Definition.

Fraud refers to the act of seeking unlawful benefits through one's duties or by illegal means for oneself or others. This includes various actions as follows:

- 1) Asset Misappropriation refers to the act of possessing assets belonging to others, or in which others hold joint ownership, and dishonestly converting such assets for one's own benefit or for a third party.
 - 2) Fraud (Embezzlement) refers to the act of deceiving others by presenting false information or concealing facts that ought to be disclosed. Such deception results in obtaining assets from the deceived person or a third party, or induces the deceived person or a third party to execute, withdraw, or destroy any legal documents of right.
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- 3) Financial Statement Fraud refers to the intentional manipulation of accounting figures by exploiting loopholes in accounting principles, measurement alternatives, or disclosure practices to alter financial data. This is conducted to ensure the financial statements reflect a desired outcome for illicit purposes.
- 4) Corruption refers to any act, whether through offering, promising, soliciting, demanding, giving, or accepting assets or any other benefits to or from government officials or any individuals doing business with the Group, whether directly or indirectly. Such acts are intended to influence these persons to perform or refrain from performing their duties in order to acquire or retain inappropriate business advantages, except where permitted by law, regulations, rules, local customs, or trade traditions.

Corruption Payments or Fraudulent Benefits include the payment of money, assets, or any other benefits made directly by the Company or the Group, or indirectly through customers, business partners, or any third party.

Gifts, Hospitality, or Any Other Benefits refer to the acceptance or offering of gifts, assets, or other advantages, as well as hospitality. This encompasses the giving and receiving of sponsorships, donations, political contributions, and conflicts of interest in the form of money, items, or any other formats that could lead to risks of fraud and/or corruption, or may cause discomfort and potentially influence decision-making in the performance of duties.

Bribery refers to the giving, offering, promising, accepting, or soliciting of money, assets, or any other inappropriate benefits to or from government officials, private sector individuals, or any relevant parties, whether directly or indirectly. Such acts are intended to influence these persons to perform or refrain from performing their duties in order to acquire or retain business or any other inappropriate business advantages, except where permitted by law, regulations, announcements, rules, local customs, or trade traditions.

Conflict of Interest refers to situations or actions where directors, executives, or employees of the Company have personal interests or those of their associates that impact decision-making or hinder the ability to perform duties with impartiality. Such situations

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prioritize personal or associate gains over the collective interest of the organization. These actions may occur consciously or unconsciously, intentionally or unintentionally, and in various forms—at times becoming common practices perceived as non-wrongful. Consequently, this leads to a lack of fair and objective judgment, as personal or associate interests are placed above all else.

Facilitation Payment refers to small unofficial payments made to government officials solely to ensure that they perform routine governmental actions or to expedite processes that do not require the official’s discretion. Such actions must be within the official's legal scope of duty and involve rights to which the entity is already legally entitled, such as applying for licenses, requesting certificates, or receiving public services.

Gifts and Tokens of Appreciation refer to cash or non-monetary items provided as a gesture of courtesy on various occasions (or in accordance with social practices) at a reasonable value and appropriate timing, in alignment with customary traditions.


Hospitality refers to the provision of food and beverages, entertainment, sporting events, participation in sports activities (e.g., golf), and other recreational activities.

Business Entertainment and Hospitality refer to the arrangements or expenses incurred by the Company for legitimate business purposes, building good relationships, or as a matter of social etiquette directly related to business operations or customary traditions. Entertainment and hospitality expenses may include accommodation, travel, food and beverages, or other expenditures associated with business negotiations, site visits, study tours, or the provision of business knowledge and understanding, etc.

Sponsorship refers to the provision of monetary or non-monetary support to customers, business partners, joint venture partners, or any other individuals, for the purpose of business interests, enhancing the Company’s reputation, or fostering business relationships.

Charitable Contribution refers to the provision of monetary or non-monetary support to other agencies or organizations for charitable purposes or public benefit, aimed at assisting or supporting society, the community, or those in distress.

Political Contribution refers to the provision of assets, other benefits, or premises—such as accommodation, hospitality venues, or gathering spaces—to facilitate political parties, politicians, or politically connected persons. This includes support for improper

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policies or actions that violate the Constitution, resulting in adverse effects on the community, society, or the country, as well as fostering social division, whether directly or indirectly.

Government Official refers to any person who currently serves or formerly served as a state official, consultant to state agencies, or political office holder. This includes civil servants or local government employees holding permanent positions or receiving regular salaries; employees or individuals working in state enterprises or government agencies; local executives and local assembly members who are not political office holders; and officials under local administration laws. This definition further encompasses directors, sub-committee members, and employees of government agencies, state enterprises, or state entities, as well as any individual or group of persons exercising or assigned to exercise state administrative power in accordance with the law, whether established within the bureaucracy, state enterprises, or other state undertakings.

4. Scope.


This Policy is applicable to all directors, executives, and employees of the Company and its subsidiaries, encompassing all principles, policies, and operational guidelines.

5. Principles and Rationale.

The Company firmly believes that conducting business with integrity, honesty, fairness, transparency, and a strong anti-corruption stance will earn the trust and confidence of our customers, business partners, creditors, debtors, employees, shareholders, and all stakeholders. This commitment ensures that the Company can achieve stable, robust, and sustainable long-term growth.

6. Anti-Corruption Policy.

The Company conducts its business in strict adherence to the principles of Good Corporate Governance for the ultimate benefit of the Company, its shareholders, stakeholders, and all involved parties. The Company shall not exploit any channels for

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convenience or advantage, nor engage in any acts to circumvent accountability that could lead to fraud or corruption. Accordingly, the Company has established this Anti-Corruption Policy as a core principle and operational guideline for all directors, executives, and employees, as follows:

1) Directors, executives, and employees shall not engage in any form of fraud or corruption, whether directly or indirectly, for their own benefit or for the benefit of others. This includes, but is not limited to, offering, promising, soliciting, demanding, requesting or accepting benefits, providing advantages, inducing illegal acts, breaching trust, or any other actions constituting fraud or corruption.


2) Directors, executives, and employees have a duty to comply with the Anti-Corruption Policy and measures, as well as adhere to Thai anti-corruption laws. Any violation or failure to comply with this policy shall be subject to disciplinary action and/or legal proceedings, as the case may be.

3) Directors, executives, and employees have a duty to remain vigilant and prevent fraud and corruption within the Company. Upon encountering any fraudulent or corrupt acts, or any actions that may potentially lead to fraud or corruption, they must immediately notify their supervisor or report through the whistleblowing channels established by the Company.

4) The Company shall maintain the confidentiality of all whistleblower details. Those who report in good faith and with sincere intentions, as well as those who refuse to engage in fraud or corruption, will be protected by the Company and shall not suffer any adverse consequences as a result of such actions.

5) The Company shall establish policies and operational guidelines to prevent various forms of fraud and corruption, such as political contributions, charitable donations, sponsorships, and expenses for gifts and hospitality. Furthermore, the Company shall implement oversight and monitoring mechanisms to ensure these activities are transparent, in compliance with relevant laws, and do not lead to improper or inappropriate benefits.

6) The Company shall establish adequate and appropriate internal control systems to prevent fraud, corruption, and any operations that do not comply with the principles of Good Corporate Governance.

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7) The Company shall conduct fraud and corruption risk assessments and implement appropriate anti-corruption measures. Operational risks that may potentially lead to fraud and corruption must be reviewed and assessed at least once a year.

8) The Company shall provide communication channels to ensure that employees and stakeholders are informed of the Anti-Corruption Policy. Furthermore, the Company shall establish whistleblowing channels to allow for the reporting of leads, complaints, and suggestions. These reports will be subject to fact-finding investigations in accordance with established procedures, leading to subsequent corrective actions and improvements.


9) The Company shall develop human resource management systems to foster anti-corruption values and culture. This includes communicating and disseminating knowledge to personnel to ensure awareness and understanding of the Anti-Corruption Policy and ethical operational guidelines.

10) Procurement activities must be conducted with transparency and in strict compliance with the law, internal regulations, and the Company's established procedures. Furthermore, regular audits of procurement operations shall be implemented to ensure continuous compliance.

7. Duties and Responsibilities.

1) Board of Directors.

The Board of Directors is responsible for reviewing and approving the Anti-Corruption Policy and fostering a culture of anti-corruption within the Company, ensuring that all personnel understand and recognize the significance of issues arising from fraud and corruption, and embedding these values into the corporate culture. Furthermore, in the event that the Anti-Corruption Committee reports corrupt acts impacting the Company, the Board of Directors shall provide consultation, guidance, and deliberate on disciplinary actions, while collaboratively identifying solutions for the Directors and the Chief Executive Officer (CEO).

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2) Audit and Risk Management Committee.

The Audit Committee is responsible for reviewing the financial and accounting reporting systems, internal control systems, internal audit systems, and risk management systems. This ensures their compliance with anti-corruption measures and guarantees that such systems are robust, appropriate, up-to-date, and effective.

3) Internal Audit Department.

The Internal Audit Department is responsible for auditing and reviewing operations to ensure compliance with the policies and operational guidelines established by the Company, as well as adherence to relevant laws and regulations. This is to guarantee that the anti-corruption systems of the Company and its subsidiaries are appropriate and adequate. Furthermore, the Department is required to provide regular reports to the Audit Committee.


4) Chairman of the Executive Committee and Chief Executive Officer (CEO).

The Chairman of the Executive Committee and the Chief Executive Officer (CEO) are responsible for establishing systems that promote, support, and oversee compliance with the Anti-Corruption Policy among all employees and relevant parties. This includes conducting regular reviews to ensure that various measures remain appropriate, effective, and up-to-date.

8. Guidelines.

8.1 The giving and receiving of gifts, souvenirs, hospitality, or any other benefits must be conducted in accordance with the following guidelines:

- 1) Do not accept, give, or solicit gifts or souvenirs in the form of cash, checks, bonds, shares, gold, gemstones, real estate, or equivalent items from/to any related parties in government or private sectors with whom business is conducted, for the purpose of obtaining improper benefits.
 - 2) Do not accept, give, or solicit any assets, items, gifts, tokens, or other benefits that could induce the neglect or omission of official duties.
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3) Do not accept, give, or solicit any assets, items, gifts, tokens, or other benefits intended to influence decision-making or result in non-compliance with appropriate and equitable practices.

4) Do not act as an intermediary in offering money, assets, items, or any other benefits to business-related parties, government agencies, or any organizations in exchange for undue privileges, or to cause government officials to circumvent laws, rules, regulations, and legal procedures.


Possible exceptions.

The giving or receiving of gifts and tokens of appreciation during traditional festivals—such as the New Year—or as gestures of congratulations on various occasions, is permissible at a reasonable value and in accordance with the Company’s rules and regulations. The Company has set a value limit for giving festive gifts at no more than 5,000 THB per person, per occasion. For receiving festive gifts, the value must not exceed 3,000 THB per person, per occasion.

Furthermore, in the Corporate Governance Committee Meeting No. 1/2025, the committee resolved to approve the 'No Gift Policy,' which prohibits receiving gifts or tokens from business associates during all festive periods. For detailed procedures regarding this policy, personnel may refer to the 'Guidelines and Procedures for Giving and Receiving Gifts' available on the Company’s Intranet system.

8.2 The giving or receiving of business entertainment, including hospitality services and other expenses related to the fulfillment of business contracts (Hospitality, Entertainment, and Expense), must be conducted in accordance with the following guidelines:

- 1) The provision of business entertainment must have a clearly stated purpose, include verifiable evidence, and be processed through the Company’s established procedures and regulations.
 - 2) Accepting business hospitality must serve a clearly defined business purpose, adhere to customary business practices, and must not serve as a channel for fraud or corruption.
 - 3) Business hospitality expenses must not exceed 3,000 THB per person, per occasion.
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Furthermore, the giving or receiving of business hospitality must strictly adhere to the guidelines and procedures regarding business hospitality and related expenses.

8.3 The provision of sponsorships must be conducted in accordance with the following guidelines:

1) Any use of the Company's funds or assets including, but not limited to, the provision of advertising space managed by the Company free of charge to support projects organized by external parties outside the Group must be conducted solely in the Company's name. Such support must be for the purpose of business interests, enhancing a positive corporate image, and promoting the Company's reputation.


2) All sponsorships must have a clearly stated purpose, include verifiable evidence, and be processed through the Company's established procedures as specified in the "Guidelines and Procedures for Sponsorship.

3) The Company does not have a policy to accept sponsorships from any external agencies or organizations.

8.4 Charitable contributions must be conducted in accordance with the following guidelines:

1) Any use of the Company's funds or assets managed by the Company provided free of charge for charitable purposes must be conducted solely in the Company's name. Such donations must be directed to foundations, public charity organizations, temples, hospitals, medical facilities, or socially beneficial organizations that are certified or reputable and verifiable. All donations must be processed through the Company's established procedures as specified in the "Guidelines and Procedures for Charitable Donations.

2) Charitable donations made in a personal capacity are permissible, provided they are not associated with the Company and do not raise suspicions of fraudulent intent or the expectation of improper benefits.

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3) The Company does not have a policy to accept charitable donations from any external agencies or organizations.

8.5 Facilitation Payments.

The Company maintains a strict policy against facilitation payments in any form, whether direct or indirect. The Company shall not engage in, nor accept, any actions in exchange for the facilitation of business operations. However, legally established expedited processes are acceptable, provided such services are available to the general public or are conducted within the legal framework prescribed by the laws of that respective country.

8.6 Hiring of Government Officials and State Employees (Revolving Door).

The Company maintains a policy against hiring government officials or state employees who are currently in office for positions that may lead to a conflict of interest, or as a form of reciprocation for business favors. Such recruitment poses a significant risk of fraud and corruption.


8.7 Interacting with Government Agencies and Officials (Government Interaction) must be conducted in accordance with the following guidelines:

1) Employees must perform their duties with due care and transparency when communicating or engaging with government agencies and officials.

2) Employees must refrain from any actions intended to obtain undue leniency from regulatory oversight or to induce government officials to neglect their duties, which constitutes an unlawful abuse of power.

8.8 Political contributions must be conducted in accordance with the following guidelines:

1) The Company is committed to maintaining political neutrality, supporting the rule of law, and upholding democratic principles. The Company does not have a policy to provide political assistance, either directly or indirectly, to political parties, politicians, or any politically affiliated individuals. An exception is made for public interest activities, such as utilizing Company-

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managed resources to campaign for and encourage citizens to exercise their voting rights. Such assistance must be requested in writing by a government agency, stating a clear objective with verifiable evidence, and must be processed through the Company's established procedures as specified in the 'Guidelines and Procedures for Political Assistance'.

2) The Company supports the political rights and freedoms of its directors, executives, and employees as law-abiding citizens. Individuals have the right to express their views, participate in, or support political activities outside of working hours using only their personal resources. Engaging in political activities within the Company or utilizing Company resources for such purposes is strictly prohibited. The guidelines are as follows:


- All employees may exercise their political rights in their own name. Employees must exercise caution to avoid any actions that could lead others to believe such activities are conducted on behalf of the Company.

- When participating in political activities, employees must refrain from any acts or omissions that could mislead others into believing the Company favors a particular political party or supports any political movement, coalition, political figure, or candidate.

- Employees participating in political activities must not wear the Company's uniform or use any corporate symbols. Furthermore, they must refrain from any conduct that may imply the Company's affiliation with or support for a political party, political coalition, political authority, or election candidate.

8.9 Upon encountering any acts that constitute or imply potential fraud or corruption involving the Company, whether directly or indirectly, individuals must not remain indifferent or ignore such behavior. Such matters should be reported immediately to the Chief Executive Officer (CEO) or through the whistleblowing channels established under this policy.

8.10 Directors and executives must recognize the importance of disseminating knowledge, providing training, and offering guidance to ensure that subordinates thoroughly understand anti-corruption measures. This is to ensure that all employees comply with this Anti-Corruption Policy. Furthermore, leadership must serve as role models by consistently demonstrating integrity, ethics, and professional conduct.

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Non-compliance with this policy by directors, executives, or employees shall result in disciplinary action in accordance with the Company’s regulations, as well as applicable legal penalties. The severity of such actions will be determined based on the facts and surrounding circumstances. Furthermore, the Company maintains a strict non-retaliation policy; no employee will be demoted, penalized, or suffer any adverse consequences for refusing to engage in corruption, even if such a refusal results in the loss of a business opportunity.


9. Whistleblowing and Complaint Policy, and Whistleblower Protection.

The Company encourages its directors, executives, and employees to conduct business with integrity, transparency, fairness, and accountability, in alignment with the Company’s Corporate Governance and Business Ethics policies. We expect all personnel to report in good faith any actions that violate or are suspected of violating these principles, enabling the Company to take corrective measures and ensure continued propriety and justice.

Accordingly, the Company has established a Whistleblowing and Complaint Policy, along with Whistleblower Protection measures. This ensures that supervisors and oversight units can effectively monitor conduct and provide guidance, while guaranteeing that those who report concerns in good faith will be strictly protected from any form of retaliation.

Reportable Misconduct and Grievance Matters.

- 1) Witnessing or encountering any improper acts related to the organization, whether direct or indirect, such as individuals within the organization offering or accepting bribes from government officials or private sector entities.
 - 2) Encountering actions that bypass the Company’s established procedures or undermine internal control systems, which could reasonably be suspected as a channel for fraud or embezzlement.
 - 3) Observing conduct that results in a loss of Company benefits or negatively impacts the Company’s reputation and corporate image.
 - 4) Witnessing actions that violate applicable laws, moral standards, or the Company’s Code of Business Conduct and Ethics.
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Whistleblowing and Misconduct Reporting Channels.

At present, the Company has established systematic, transparent, and fair reporting channels, along with procedures for investigating and protecting whistleblowers. These measures are designed to ensure that all stakeholders have full confidence in the integrity of the process, in accordance with the Company's Whistleblowing Policy. The available channels for reporting misconduct and grievances are as follows:

Direct Whistleblowing and Misconduct Reporting to the Chairman of the Audit and Risk Management Committee via the Company's website: www.prtr.com

1. By email : Directly to the Chairman of the Audit and Risk Management Committee

Email: whistleblowing@prtr.com

2. Email: Please send reports directly to the Chairman of the Audit and Risk Management

Committee at Email: whistleblowing@prtr.com

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The Chairman of the Audit and Risk Management Committee shall designate a responsible person to coordinate, investigate, monitor, and consolidate the audit findings for reporting to the Audit and Risk Management Committee.

Whistleblower Protection and Confidentiality Measures.

To protect the rights of whistleblowers and informants acting in good faith, the Company shall keep their identities, addresses, and any identifiable information strictly confidential. Access to such information is restricted solely to the individuals responsible for handling the investigation.

Furthermore, any person who obtains information through the performance of their duties related to a complaint is strictly obligated to maintain the confidentiality of the report, evidence, and identity of the whistleblower or informant. Disclosure of such information to unauthorized parties is strictly prohibited, except where required by law.

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10. Investigation Procedures and Sanctions.

1. Upon receipt of a report, the Internal Audit Department is assigned to screen and verify the initial facts. If the Internal Audit Department determines that the information is sufficient, substantiated, and credible, they will coordinate with the Human Resources Department to propose a list of Investigation Committee members to the Senior Vice President of Corporate Administration to proceed with a formal investigation.


2. During the investigation process, the Chief Executive Officer (CEO), the Senior Vice President of Corporate Administration, and the Audit and Risk Management Committee shall maintain oversight of the proceedings.

3. If the investigation finds reasonable grounds to believe that the accused has committed fraud or corruption, the Company shall grant the accused the right to be informed of the allegations. The accused shall also be given the opportunity to prove their innocence by providing additional information or evidence demonstrating their non-involvement in the alleged misconduct.

4. If the accused is found to have committed fraud or corruption, such acts shall be considered a violation of the Anti-Corruption Policy and the Group's Corporate Governance and Business Ethics Manual. The perpetrator shall be subject to disciplinary action in accordance with Company regulations. Furthermore, if the misconduct is unlawful, the perpetrator may also face legal penalties under the law.

11. Fraud Risk Assessment and Internal Control.

The Company recognizes that the risk management process is a critical component that enables the organization to identify various risks, ensuring preparedness and timely responses to changing business environments. Effective risk management also enhances opportunities for sustainable growth. Consequently, the Company consistently identifies and evaluates factors that may impact its business operations, financial position, and performance. This includes the regular assessment of potential fraud and corruption risks within operational processes and methodologies (at least once a year). The Company evaluates existing risks and develops

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additional risk mitigation measures (if necessary) to ensure that risks are maintained at an appropriate and acceptable level (Risk Appetite). Furthermore, the Company implements necessary and suitable processes aligned with its business nature to ensure a robust internal control system capable of managing and preventing fraud and corruption.

12. Employee Training and Communication

The Company shall provide training to ensure that directors, executives, and employees possess a comprehensive and accurate understanding of fraud and corruption. This includes educating them on the organization's anti-corruption policies and risk management guidelines to ensure their duties are performed with integrity, transparency, and accountability. The training will focus on providing clear guidance on the methods and procedures for handling complaints, thereby building employee confidence in the whistleblowing and reporting system. Furthermore, the Company is committed to continuously reinforcing ethical awareness and integrity among its leadership and staff through supplemental training, internal communication campaigns across various media channels, and specialized corporate activities.

Dissemination of Anti-Corruption Policy

To ensure that all individuals within the organization are fully informed of the Anti-Corruption Policy, the Company shall undertake the following actions:

1. The Company shall disseminate the Anti-Corruption Policy through various corporate communication channels, including electronic mail (E-mail), the Company's website, public relation boards, and the internal corporate network (Intranet). Furthermore, the policy will be communicated to business partners and disclosed in the Annual Registration Statement / Annual Report (Form 56-1 One Report) to ensure awareness among employees and external stakeholders.
 2. The Company shall provide training on the Anti-Corruption Policy and related guidelines to all new employees to ensure accurate understanding. This subject shall be integrated as a core module in the New Employee Orientation program.
 3. The Company shall consistently review the Anti-Corruption Policy.
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Appendix: List of Companies Subject to This Policy

This policy applies to **PRTR Group Public Company Limited**, as well as its subsidiaries under its direct or indirect control.

The companies within the scope of this policy include the following:

1. PRTR Recruitment Company Limited
2. PRTR Recruitment and Outsourcing (Eastern Seaboard) Company Limited
3. Nexmove Platform Recruitment Company Limited
4. The Blacksmith Company Limited
5. Pinno Solutions Company Limited
6. PRTR Global Recruitment Company Limited
7. Biz Resource Company Limited

Remarks:

- Newly established subsidiaries or subsequent investments shall automatically fall within the scope of this policy, unless otherwise specified.
- For companies not under the Company's control, this policy may be adopted and applied as appropriate.

Additional Note: This appendix shall be deemed an integral part of this policy and shall have the same full force and effect as the main policy in all respects.