

Announcement No. 14/2023

Facilitation Payment and Revolving Door Policy

The Erawan Group Public Company Limited and Subsidiaries ("The Company") is adhered to conduct our business based on the principles of good corporate governance and follow our motto of "Success with Integrity", we also ensure to be transparent and verifiable business operation and zero corruption in every aspect. The Company has focused on creating value for our shareholder while considering every stakeholder group.

To prevent and manage risks in contacting with government agency, government employee or government official that may be at risk of corruption as well as to prevent any conflicts of interest between personal interest and public interest, therefore, the Company had announced the policy and practices on facilitation payment and revolving door for the employees to conform as follows:

Facilitation Payment

"Facilitation payment" means a small amount of expenses unofficially offered to the government employee or government official to ensure that such government employee or government official will proceed according to the procedures or speed up faster action in which such procedures do not necessarily depend on the judgement of the government employee or government official and is considered an act of duty of such government employee or government official as well as deemed a right to which any legal entities shall be entitled; for example, request for an authorization, certification and receipt of any public services etc.

(Reference: Guidelines on the Specification of Suitable Internal Control Measures by the Office of the National Anti-corruption Commission)

The Company's Practices

1. The Company shall not offer any facilitation payments to a government employee or government official in any cases in order to prevent the violation of the Anti-Corruption Policy and the occurrence of bribery as well as increasing business costs and the loss of the Company's reputation and good image.
2. The Company strictly prohibits any facilitation payments, whether direct or indirect, in any form.

Revolving Door

"Government employee/Government official" means a person holding a political position, Government official or local official assuming a position or having permanent salaries, official or person performing duties in a State enterprise or a State agency, local administrator and member of a local assembly who is not a person holding a political position, official under the law on local administration and shall include a member of a Board, Commission, Committee or of a sub-committee, employee of a Government agency, State enterprise or State agency and person

or group of persons exercising or entrusted to exercise the State's administrative power in the performance of a particular act under the law, whether established under the governmental bureaucratic channel or by a State enterprise or other State undertaking. (Reference: The Organic Act on Counter Corruption, B.E. 2542 (1999))

The Company's Practices

1. The Company shall not consider the employment or appointment of a government employee or government official who still holds position, except only in case of a state enterprise or government agency or government sector with the specification from the establishment agency or being authorized by the relevant law or being allowed to have a representative from such agency to perform his/her respective duty in the organization. However, this must be proceeded according to lawful procedures and objectives.
2. To prevent any conflicts of interest between personal interest and public interest, the employment of former government official whereby the Company used to be under the governance, supervision, control or inspection of the agency where such government official is working under or is performing his/her duty as a government official or the employment of a person who used to work for the government agency directly relating to the Company. The Company, therefore, shall consider a cooling-off period for 2 years. (Reference: Section 127 of the Organic Act on Counter Corruption B.E. 2561)
3. The selection, employment approval and specification of compensation in hiring a government employee or government official to hold a position of the President or Vice President must be carefully considered by the Management Development and Compensation Committee and/or a specific committee appointed by the Company's Board of Directors as well as must be approved by the Board of Directors.
4. The selection, employment approval and specification of compensation in hiring a government employee or government official to hold a position of employee at a level of Assistant Vice President and lower or a consultant must be considered for reason and necessity as well as must be approved by the President.
5. The Company has determined background verification of a person who is being nominated to hold a position of the President, a consultant and senior executive of the Company to inspect for any potential conflicts of interest before appointment.
6. It is prohibited to hire any government employees or government officials if such employment is intended to benefit the Company or may incur reciprocal benefit and must not involve or must not be for an abuse of power or must not incur any conflicts of interest; for example, disclosure of confidential information of the government agency where such government employee or government official used to work under, any lobbies to gain benefits wrongfully or any assignments to contact former agency where such government employee or government official used to work under.

7. The Company shall disclose information on the employment of government employees or government officials, coupled with reason of appointment in the 56-1 One Report for transparency purposes.

The Company has taken into account the conflicts of interest or reciprocal benefits between Public Sector and the Company, therefore, the Company has no policy to assign the Company's personnel to work on the Policy of the Public Sector in order to prevent the involvement of any exploiting his/her authority wrongfully or the occurrence of any conflicts of interest; for example, disclosure of confidential information of the government agency where such government employee or government official has come to work for, any lobbies to gain benefits wrongfully etc.

Penalty

Any actions that violate or fail to comply with this policy shall be regarded as misconduct and shall be subject to disciplinary consideration in accordance with the Company's rules, regulations, and Employee Handbook Section 14 Discipline and Disciplinary Actions, and/or other applicable laws and regulations.

Reviewed and duly approved by the Board of Directors
at Meeting No. 8/2025, held on 24 November 2025