



Announcement of TEAM Consulting Engineering and Management Public Company Limited

No. 46/2025

Subject: Policy and Guidelines on Anti-Corruption in Procurement and Business Code of Conduct

TEAM Consulting Engineering and Management Public Company Limited operates its business with a firm adherence to corporate values, business ethics, and the principles of good corporate governance, as well as complying with laws related to the prevention of all forms of corruption, both direct and indirect.

To ensure that TEAM Consulting Engineering and Management Public Company Limited has appropriate policies, practices, and operational requirements in place to prevent fraud in procurement, the Company has established a written policy and guidelines on the prevention of fraud in procurement, together with a Business Code of Conduct. These are intended to be strictly observed by directors, executives, employees, and all relevant stakeholders.

This announcement hereby repeals the Announcement of TEAM Consulting Engineering and Management Public Company Limited No. 12/2562 regarding the Policy and Guidelines on the Prevention of Fraud in Procurement and the Business Code of Conduct, which was announced on January 12, 2019, and replaces it with this announcement.

1. Definitions

Fraud means any act undertaken to seek unlawful benefits for oneself or others, including but not limited to acts such as:

- **Asset Misappropriation** means possessing property that belongs to another person, or is owned by another person, and dishonestly appropriating such property for oneself or a third party.
- **Embezzlement** means deceiving another person by making a false statement or by dishonestly concealing a fact that should have been truthfully disclosed, thereby obtaining

property, or causing the deceived person or a third party to make, withdraw, or destroy any legal document.

- **Corruption** means requesting, accepting, or agreeing to accept; giving, requesting, or offering; or making a promise to provide money, property, or any other benefit to a government official, government agency, private sector officer, or private entity in order to induce such person or entity to exercise their authority to act or refrain from acting, to expedite or delay an action, in a manner contrary to their lawful duties, thereby unlawfully obtaining benefits for oneself or others, or maintaining an improper business or advantage.

Property means money, items, gifts, or any other benefits that can be valued in monetary terms, including special privileges not ordinarily available to the general public, such as discounts on goods, services, or entertainment; payment of expenses for travel or tours, accommodation, meals; job placement; or any other similar benefits, whether provided in the form of cards, tickets, or other evidence, advance payments, or subsequent reimbursements.

The Company refers to TEAM Consulting Engineering and Management Public Company Limited

Personnel refers to directors, executives, employees, and stakeholders of TEAM Consulting Engineering and Management Public Company Limited.

2. Duties and Responsibilities

1) The Board of Directors

- (1) Consider and approve the policies and guidelines for preventing fraud in procurement, and the business code of conduct.
- (2) Oversee the establishment of an effective anti-corruption support system.
- (3) Promote and support the development of an organizational culture that conducts business with integrity.

2) Executives

- (1) Establish rules, regulations, and measures for employees to follow, including the determination of disciplinary actions.
- (2) Establish a work system that promotes and supports anti-corruption, as well as review the appropriateness of the systems and measures.

- (3) Promote and communicate this policy to employees and all relevant parties to ensure their knowledge and understanding.
 - (4) Provide a channel for whistleblowing or complaints, along with measures to protect whistleblowers or complainants.
 - (5) Report on the performance to the responsible committee.
 - (6) Review/Revise various policies.
- 3) Legal Department
- (1) Responsible for implementing anti-corruption measures
 - (2) Review, monitor, and consider compliance with anti-corruption policies and guidelines in procurement and the business code of conduct on an annual basis, and regularly report the operating results to the Board of Directors.
- 4) Employee
- Must understand and comply with the anti-corruption policies and guidelines in procurement and the business code of conduct, and must not be involved in corruption, either directly or indirectly.

3. Guidelines

1) Procurement shall be carried out in accordance with the criteria or procedures prescribed in the regulations, ensuring fairness and transparency in the process. Consideration shall be given to price reasonableness, quality, and after-sales service, as well as to the standards that suppliers of goods or services are expected to meet. Furthermore, officials shall not engage in any business that may lead to personal benefits by exploiting their position in procurement, whether directly or indirectly, nor shall they use information obtained through procurement activities to seek personal gain or benefits for others.

2) The Company has no policy to make facilitation payments in any form, whether directly or indirectly, and shall neither engage in nor accept any acts in exchange for business facilitation.

3) Personnel must strictly comply with the Company's anti-corruption policies and guidelines in procurement, as well as the business code of conduct.

4) Personnel must not neglect or ignore any acts that may constitute corruption. Such incidents must be reported to the management or responsible persons, and full cooperation must be provided in the fact-finding process.

5) Personnel must avoid actions that present a conflict of interest. In the event of any act or circumstance that may constitute a conflict of interest with the Company, the personnel concerned are obliged to report such conflict of interest through the prescribed channels.

4. Code of Conduct

The Company adheres to business ethics, and directors, executives, and employees shall comply with the following code of ethics:

- 1) Perform duties in compliance with applicable laws, regulations, rules, and relevant policies.
- 2) Perform duties professionally with honesty, integrity, prudence, independence of judgment, and adherence to facts.
- 3) Devote time to performing duties with full commitment and to the best of one's ability.
- 4) Treat colleagues, supervisors, subordinates, customers, shareholders, and stakeholders with courtesy, dignity, and respect for their rights, while serving as a good role model.
- 5) Maintain business confidentiality at all times, even after the termination of employment or relationship with the Company.
- 6) The Company maintains political neutrality by refraining from engaging in or providing financial or other forms of support to political parties, political groups, or political authorities, whether directly or indirectly. However, the Company respects the political rights of its personnel as good citizens under the Constitution, such as exercising the right to participate in lawful political expression or voting in elections, as well as exercising personal political freedoms that do not affect the Company's image or cause harm to the Company.
- 7) Do not engage in or be involved with the receipt or provision of any assets or other improper benefits.
- 8) Donations for assistance, charity, or public purposes shall be solely for charitable objectives and must be supported by proper documentation.
- 9) The Company discloses information based on facts, adhering to the principles of fairness, transparency, and accountability.

5. Disclosure of the Anti-Corruption Policy in Procurement and the Business Code of Conduct

In order to ensure that the Company's personnel are informed of the anti-corruption policy in procurement and the business code of conduct, the Company shall undertake the following actions:

- 1) Announce the anti-corruption policy in procurement and the business code of conduct in a prominent place to ensure that everyone in the organization is informed.
- 2) Disseminate the policy on the prevention of fraud in procurement and the business code of conduct through the Company's various communication channels, such as the intranet system, the Company's website, and the annual report.
- 3) Review the policy on the prevention of fraud in procurement and the business code of conduct on an annual basis or when there are significant changes.

6. Training

Provide orientations, training, meetings, or other appropriate activities concerning the policy and guidelines for the prevention of fraud in procurement, the business code of conduct, and related knowledge to the Company's directors, executives, employees, and stakeholders on a continuous basis.

7. Whistleblowing or Complaints

When witnessing any act that is unlawful, against regulations, unethical, or in violation of this policy, whether directly or indirectly, details of the matter for whistleblowing or complaints can be reported to:

- 1) Suggestion and Complaint Box
- 2) Report whistleblowing and complaints directly to any trusted supervisor at all levels, the Human Resources Department, the Internal Audit Department, the Company Secretary, the Audit Committee, or the Board of Directors.
- 3) Company Website <http://www.team.co.th>
- 4) E-mail, sent directly to the Audit Committee at whistle-blowing@team.co.th
- 5) Send by post directly to the Board of Directors or the Audit Committee at

TEAM Consulting Engineering and Management Public Company Limited
151 Nuan Chan Road, Nuan Chan, Bueng Kum, Bangkok 10230 Thailand

The whistleblower or complainant will be protected, and the information will be kept confidential. It will not affect their position either during the investigation or after the process is completed.

8. Penalty

Personnel who fail to comply with this policy shall be subject to disciplinary action as determined by the Company. In addition, they may also be subject to legal penalties if such actions are against the law.

This Policy on the Prevention of Procurement Fraud and the Business Code of Conduct shall take effect from May 14, 2025 onwards.

.....
(Mr. Rapee Phongbupakicha)
Chairman of the Board