#### **Anti-corruption Policy**

The company recognizes the importance of managing and operating under the good governance by applying the principles of business conducting with integrity and lucidity, so the anti-corruption policy is determined in order to apply to all directors, executive officers and employees of the company to avoid any actions that may be related to corruption in all forms whether for direct or indirect benefits to oneself, family, friend, or any related person.

### 1. Scope

- 1.1 This policy is applied to all directors, executives, employees, and all employees of the company
- 1.2 The company will provide right to franchisee or any person to act on behalf of the company to comply with this policy.

### 2. Duty and responsibility

- 2.1 The Board of the company is responsible for considering and approving policy against corruption, and it is assigned to the management section to oversees and apply this anti-corruption policy as well as measure to practice.
- 2.2 The Audit Committee is responsible for reviewing the internal control system and risk assessment related to corruption according to the proposal of Internal Audit Department in order to ensure that such system has a risk to cause the least and minimum fraud affection the financial position and company implementation, and it must ensure appropriateness to the business model of the company.
- 2.3 The CEO and management section are responsible and accountable for the governance and communication to employees and related parties to implement this policy and perform strictly, including the need to review the appropriateness of the policy against corruption in order to apply with the change of business or legal requirement in order to propose to the Board of Directors.

2.4 The internal audit section shall perform the duty as per the internal audit plan, and then reports to internal control monitoring result and risk assessment related to the corruption to the audit committee, including the performance related to the assigned tasks provided by the audit committee on corruption related to the organization in addition to the defined internal audit plan.

## 3. Policy and practice

Directors, executive officers, and employees of the company must comply with the anticorruption policy strictly without getting involved in corruption, either directly or indirectly as follows:

- 3.1 Directors, executive officers, and employees of the company shall not perform any actions or participate in any implementation seen as giving or accepting bribes from stakeholders related to their own performance and responsibilities directly or indirectly to obtain illegal benefits or to call for any benefits from partners or suppliers who do business with the company. However, giving or receiving gift, privilege, dinner of welcome shall be implemented as per the code of conduct.
- 3.2 The use of fund or asset of the company for charity or donation as well as sponsorship shall be implemented on behalf of the company only by donating to foundation, educational institutions, public organizations, hospitals, nursing homes or institutions for the benefit of society with evidence that can be reviewed and it shall be carried through the regulation of the company.

### 4. Corruption and Whistle-Blowing

Any person who witnesses any action deemed pro-corruption or involved with corruption which may affect the Company, either directly or indirectly, shall not neglect or ignore such behavior and shall immediately notify the Audit Committee or the Chief Executive Officer or notify through the specified whistle-blowing channels as follows:

- 1) Through the e-mail of the Secretary of the Audit Committee at eakapong@jwd-logistics.com or the Company Secretary at nattpume@jwd-logistics.com
- 2) Through the e-mail of the Chief Executive Officer at charvanin@jwd-logistics.com or the suggestion box: CEO Talk
  - 3) Inform through e-mail of the organization: pr@jwd-logistics.com

# 5. Protection and Secrecy Measures

In order to protect the rights of the complainant and the honest data provider, the company will conceal name or address that can be used to identify the complainant or the data provider. And, the company will keep all information of complainant or the data provider confidentially by limited to only those who have responsibility to investigate complaints to access to such information.

The Audit Committee and/or Chief Executive Officer has an obligation to use its discretion to order as it is appropriate to protect the whistle-blower or the complainant as well as witness and person who provided facts for investigation in order not to get any obstacle, danger, or unjust occurred by confessing, complaining, being witness or providing information.

Thus, the data obtained from the implementation related to the complaints shall be kept safely. The complaints and evidences of the complainant as well as information shall be kept confidentially. It is prohibited to disclose such information to any third party without the individual concerned, except for the disclosure obligations under the law.

### 6. The process of conducting an investigation and penalties

- 6.1 When the clue is notified, the Audit Committee and / or the Chief Executive will consider for the facts of the investigation or designate it to representatives (executives) to be the investigator for such facts.
- 6.2. During the investigation for the facts, the Audit Committee and/or the chief executive officer may assign the work to representatives (executives) to report progress periodically to the whistle-blower or complainant.
- 6.3 If the investigation for the facts is found any information or evidence that is believed to be the cause of committing fraud, the company will provide right to the accuser to have allegations and the right of the accused to prove themselves by finding more information or additional evidences that can be proved that they are not involved in the corruption as they are alleged.
- 6.4 If the accuser actually commits fraud, such corruption is considered as the performance against the anti-corruption policy or the company's business code of conduct, and such person will be subjected to disciplinary action in accordance with the regulations set forth by the company. If the fraud is illegal, the offender may be punished by law.