



ANTI-CORRUPTION POLICY

Moshi Moshi Retail Corporation Public Company Limited

Latest Effective Edition

Amendment No. 2, Effective March 20, 2025

Reviewed by the Board of Directors on December 23, 2025



ANTI-CORRUPTION POLICY

Moshi Moshi Retail Corporation Public Company Limited (“**The Company**”) prioritizes the fight against all forms of corruption, committing to conducting its business ethically under the framework of good corporate governance. Guided by the principles of integrity, transparency, fairness, and accountability, The Company strictly complies with all rules, regulations, and laws to ensure that the personnel of The Company and its subsidiaries do not accept corruption or bribery in any form. To this end, The Company has instituted a written Anti-Corruption Policy, aligning with and adhering to Thai anti-corruption laws, to prevent corruption and bribery across all business activities both domestically and internationally. This policy aims to prevent corruption and bribery at all levels, ensuring that high-risk business decisions are thoroughly scrutinized and executed in accordance with clear guidelines, thereby fostering stable and sustainable organizational growth.

1. Definitions

Bribery	Means the offering, promising, giving, receiving, or soliciting of any benefits as an inducement for a person to act unlawfully or immorally, thereby undermining the trust and credibility placed in The Company.
Corruption	Means the misuse of position or authority to seek personal gain. Bribery and Corruption may manifest in various forms, such as: (1) Political contributions (2) Charitable contributions and Sponsorships (3) Facilitation Payments (4) Gifts and Hospitality
Gifts, Hospitality, and Entertainment	Means the giving and receiving of items of monetary or sentimental value, whether cash or non-cash, in accordance with customs, traditions, or cultural norms, or as an expression of goodwill, recognition awards, or tokens of appreciation. This includes providing privileges for services, entertainment, as well as covering expenses for hospitality, travel or reception services, accommodation, meals, or any other items, which must be carried out appropriately, reasonably, and in compliance with established guidelines.
Sponsorships and Financial Support	Means funds paid to or received from any other individuals or juristic persons for business purposes, whether for marketing promotion or the payor’s reputation, which could potentially be used as a disguised channel for bribery, such as through charitable or sporting activities, to favor government officials or related persons. The Company's sponsorships must strictly comply with anti-corruption guidelines and must never be utilized as a tool to evade anti-corruption and bribery regulations.

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Donations	Means the giving of money, items, or any other benefits to individuals or other juristic persons without any objective of seeking business advantages or any other improper benefits. Charitable donations are part of the corporate culture and must comply with anti-corruption guidelines, being approved through processes designated by The Company, executed transparently, and free from any hidden agendas to front for or evade anti-corruption and bribery regulations.
Political Contributions	Means the provision of financial support or other forms of assistance, whether directly or indirectly, to political parties, politicians, election candidates, or political actors. Such contributions must strictly comply with applicable laws and anti-corruption guidelines.
Conflicts of Interest	Means situations where personnel are unable to perform their duties with objectivity because they possess direct or indirect personal stakes or conflicting interests with The Company, its subsidiaries, associates, other companies under The Company's control, or business agents. Such situations shall be governed by The Company's conflict of interest policy and guidelines.
Facilitation Payments	Means small, unofficial expenses paid to government officials solely to expedite routine administrative processes that do not involve the official's discretion and are within the lawful scope of that official's duties, representing rights that a juristic person is legally entitled to receive, such as applying for or renewing permits, requesting public utilities, and similar services.
Business Agents	Means individuals or organizations assigned or appointed to conduct business or act on behalf of The Company in various capacities, such as sales, marketing, business negotiation, or service provision, which may include distributors, brokers, business consultants, or business partners. Business agents must comply with the terms and conditions executed with the appointing company, as well as adhere to all applicable laws, policies, and the Code of Conduct of The Company.

2. Scope

This policy applies to all directors, executives, and employees (collectively referred to as personnel of The Company), as well as subsidiaries, associates, other companies under The Company's control, and business agents, without exception.

3. Duties and Responsibilities

3.1 The Board of Directors has the duty and responsibility to oversee the formulation, review, and implementation of the Anti-Corruption Policy within the organization, while ensuring an effective support system against all forms of corruption and bribery. To achieve this, the Board shall appoint an Anti-Corruption Subcommittee to manage anti-corruption matters, formulate policies, measures, and guidelines aligned with Thai anti-corruption rules, regulations, and laws, and embed these measures within the organization to ensure that personnel at all levels recognize the vital importance of anti-corruption and bribery prevention, integrating them into the corporate culture.

3.2 The Audit Committee has the duty and responsibility to review the accounting and financial reporting systems, verify the adequacy of internal control systems, and monitor operations to ensure compliance with relevant notifications, regulations, and laws, including reviewing the self-assessment form for anti-corruption system development and related documentation.

3.3 The Risk Management Committee has the duty and responsibility to oversee and support risk management operations, including conducting anti-corruption risk assessments.

3.4 The Chief Executive Officer has the duty and responsibility to establish systematic anti-corruption operations, while promoting and supporting the Anti-Corruption Policy and driving the implementation of anti-corruption measures and guidelines within the organization.

3.5 The Internal Audit Department has the duty and responsibility to audit and monitor operational performance to ensure accuracy and full alignment with anti-corruption policies, guidelines, regulations, and Thai laws. This ensures that appropriate and adequate internal control systems are in place to mitigate potential corruption risks, with audit results reported to the Audit Committee for acknowledgment in accordance with anti-corruption policies and guidelines.

4.Principles

4.1 Personnel of The Company, its subsidiaries, associates, other companies under The Company's control, and business agents must adhere to the Anti-Corruption Policy without exception, refraining from soliciting, giving, or accepting all forms of corruption and bribery, whether directly or indirectly. This applies regardless of whether such actions are intended for the benefit of the organization, oneself, family, friends, acquaintances, or business advantages, covering both domestic and international operations.

4.2 Personnel of The Company, its subsidiaries, associates, other companies under The Company's control, and business agents must not ignore or disregard any suspected acts of corruption and bribery related to The Company or its personnel. They are required to notify the responsible persons and fully cooperate in fact-finding investigations.

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4.3 The Company shall provide dedicated whistleblowing and grievance channels for both internal personnel and external stakeholders, ensuring fairness and protection for personnel of The Company and its subsidiaries who reject corruption and bribery, or who report corruption and bribery incidents involving The Company, its personnel, subsidiaries, associates, other companies under The Company's control, or business agents. Even if such actions result in a loss of business opportunities, The Company will not demote, penalize, or negatively affect personnel who reject corruption or bribery, and will instead commend personnel who report such clues.

4.4 This Anti-Corruption Policy covers all human resource management processes, including recruitment, selection, performance evaluation, compensation determination, and promotion. Supervisors at all levels are required to communicate and establish an understanding with employees under their supervision, ensuring effective oversight and compliance with the policy.

4.5 The Company has established anti-corruption guidelines that align with this Anti-Corruption Policy and satisfy the requirements, rules, regulations, and Thai anti-corruption laws, providing clear operational directives for The Company's personnel.

4.6 The Company shall provide communication, training, and orientation programs to its personnel regarding anti-corruption policies and guidelines to ensure proper awareness and implementation.

5. Penalties

Personnel of The Company, its subsidiaries, associates, other companies under The Company's control, and business agents who engage in any form of corruption and bribery, or fail to comply with this Anti-Corruption Policy, shall be deemed to have violated The Company's Code of Conduct. Executives and employees of The Company, its subsidiaries, associates, other companies under The Company's control, and business agents shall face disciplinary actions in accordance with the regulations established by The Company, which may include termination of employment if deemed necessary by The Company. Furthermore, personnel of The Company, its subsidiaries, associates, other companies under The Company's control, and business agents may face legal penalties if their actions violate the law.

The Company shall review the Anti-Corruption Policy at least once (1) a year to ensure its ongoing alignment with changing circumstances and The Company's business.

This Anti-Corruption Policy shall be effective from March 20, 2025, onwards.

-Warapatr Todhanakasem-

(Warapatr Todhanakasem, PH.D.)

Chairman of the Board of Directors

Moshi Moshi Retail Corporation Public Company Limited