

No. 2569/003

## Announcement

### Subject: Anti-Corruption Policy

Bangkok Insurance Public Company Limited is committed to conducting business with transparency, fairness, and in accordance with good corporate governance principles to build trust among all stakeholders. The Company recognizes and prioritizes combating bribery and corruption in all forms, both direct and indirect, as this not only benefits the Company but also contributes to the sustainable development of society and the country's economy. The Company has demonstrated its commitment by joining the Collective Action Coalition of the Thai Private Sector in the fight against corruption and adhering to Thailand's anti-corruption laws. To that end, it has established a written anti-corruption policy to serve as a clear guide for organizational development and sustainability.

#### Objectives

1. To demonstrate the Company's commitment and unwavering resolve to combat all forms of corruption.
2. To establish a framework of guidelines for the Company's directors, executives, and employees to strictly adhere to.

#### Definitions

**Corruption** means to the abuse of power for personal gain or the benefit of others, or bribery in any form – whether by offering, giving, promising, soliciting, or receiving money, property, or other undue advantages – to government officials, government agencies, private entities, or any person acting directly or indirectly in order to cause such persons to perform or refrain from performing their duties so as to obtain or retain improper business advantages.

**Receiving gifts** mean to accepting items from customers, business partners, or stakeholders on various occasions, typically as a matter of tradition, customary practice, or social courtesy to foster goodwill, friendship, or positive relationships. This should be conducted with transparency and openness.

**Other benefits** mean to any items or advantages received from customers, business partners, or stakeholders as a result of conducting normal business with the Company, such as gift certificates, tour packages, hotel vouchers, training sessions/seminars, etc.

**Entertainment expenses** mean to customary entertainment expenses in general business practice, which may include items or expenses directly related to hosting or services that benefit the Company's business, such as accommodation, meals, beverages, recreation, and sports-related costs, among others. Individuals being hosted should not be employees of the Company, unless the employee is required to participate in the hosting.

**Political Contributions** mean to financial support, goods, and/or participation in activities, as well as encouraging employees to participate in political activities on behalf of the Company to obtain a business advantage. This does not include employee participation in activities exercised as a personal right, but employees must not misrepresent themselves as acting on behalf of the Company or use any of its assets, equipment, or tools for political purposes.

**Money or goods donated to charity** means to funds or items donated by the company to public charities or for the public benefit of temples, foundations, charitable organizations, and the like.

**Monetary/Material Support** means to funds or materials the Company provides to support activities that promote its business or reputation, or to support community engagement in social and environmental initiatives, with the aim of improving quality of life and fostering social stability.

**Facilitation Payment** means to a small, unofficial payment made to a government official to ensure they follow established procedures or expedite a process, such as obtaining permits, requesting certifications, or accessing public services.

**Conflicts of Interest** means to situations where individuals within an organization act in their own interests or the interests of related parties, rather than in a way that benefits the company. This can prevent the company from achieving its objectives, potentially leading to losses or other problems. These conflicts often involve close family members – parents, siblings, or close relatives – or companies with which directors, executives, and employees have connections or shared interests. This is also referred to as a “conflict of interest.”

**Insider Information** means to non-public information that could affect the price or value of a company's securities (including futures contracts, underlying assets, or reference variables) or digital tokens.

**Government Officials / State Employees** mean to individuals who are or were formerly government officials, politicians, or advisors to government agencies, and who have taken positions with private companies. This may involve leveraging relationships or inside information to benefit the private company, or creating a conflict of interest between the duties of the government agency or business regulatory organization and the company it oversees. Such actions are intended to create an unfair business advantage or to influence policies in favor of the private companies where the former government officials are employed.

**Government officials** mean to individuals holding political positions, civil servants or local government employees with regular positions and salaries, employees or persons working in state enterprises or government agencies, local administrators, and local council members who are not political office holders. This definition also includes committee and subcommittee members, employees of government agencies, state enterprises, or government units, and individuals or groups authorized to exercise state administrative powers in any manner under the law, regardless of whether they are established within the civil service, state enterprises, or other government operations.

### Anti-Corruption Policy

Directors, executives, and employees of the Company must not solicit, engage in, or tolerate corruption in any form, directly or indirectly, for the benefit of the Company, themselves, their families, friends, or associates. This prohibition applies whether acting as a recipient, provider, or instigator of bribes, whether monetary or non-monetary, and covers all businesses, countries, and units related to the Company. They must strictly adhere to the anti-corruption policy, regularly review compliance, and revise practices and procedures to align with evolving business conditions, regulations, and legal requirements.

### Duties and Responsibilities

1. The Board of Directors is responsible for establishing and approving the anti-corruption policy, and for overseeing the implementation of effective systems and mechanisms to support anti-corruption efforts. This ensures that all personnel at every level of the Company understand and are aware of the importance of anti-corruption measures, and implement them effectively as part of the organizational culture.
2. The Audit Committee is responsible for reviewing the Company's internal control system to ensure it is adequate and appropriate for preventing and combating corruption, as well as

reviewing compliance with anti-corruption policies and measures and reporting the results to the Board of Directors.

3. The Risk Management Committee is responsible for overseeing fraud and corruption risks to ensure appropriate control and management of those risks, and to prevent them from rising to unacceptable levels for the Company.
4. Executives are responsible for fostering awareness and understanding of the anti-corruption policy among employees under their supervision, through regular training and periodic reviews of relevant systems, mechanisms, and measures to ensure alignment with evolving business practices and legal requirements.
5. The Internal Audit Office is responsible for auditing and reviewing operations to ensure compliance with relevant policies, guidelines, and laws. It also assesses the adequacy and effectiveness of internal controls related to corruption risks and reports audit findings to the Audit Committee.
6. Directors, executives, employees, and business partners are responsible for fully complying with and supporting the anti-corruption policy.

#### Guidelines for Implementation

1. The Company's directors, executives, and employees must comply with the anti-corruption policy and must not engage in any corrupt practices, either directly or indirectly. Employees who have questions or need guidance on complying with the anti-corruption policy should consult their direct supervisor.
2. The Company's directors, executives, and employees must not ignore or overlook any actions that constitute corruption related to the Company. They must report such actions to their supervisors or responsible individuals through the designated channels and cooperate in the investigation of the facts.
3. The Company has established a whistleblowing policy to allow all stakeholders who witness illegal or unethical business practices to file complaints through the channels specified by the Company. There are measures to protect the rights of whistleblowers and related persons, ensuring fairness, preventing harassment, and maintaining confidentiality. The Company will not demote, penalize, or take negative action against employees who refuse to participate in corruption, even if doing so results in lost business opportunities.

4. Information regarding whistleblowing reports or complaints will be sent directly to the head of the investigation unit, who is responsible for fact-finding. If a complaint includes evidence that the wrongdoing has a significant impact on the company's financial standing or operational results, the Audit Committee will report to the Board of Directors to implement corrective measures within a timeframe determined by the Audit Committee. If the wrongdoing constitutes internal fraud, a fact-finding committee will be formed to determine disciplinary action according to company regulations, and the results of the investigation will be reported to the Audit Committee on a quarterly basis.
5. The Company has established a risk management system appropriate to the nature of its business operations, covering various important systems, along with a process for assessing risks from potential fraud and corruption and establishing appropriate measures to manage the assessed risks. The Corporate Risk Management Department is responsible for assessing, monitoring, and presenting the results of implementation to the Risk Management Committee for review. The Risk Management Committee will then report to the Board of Directors accordingly.
6. The Company maintains an internal control system, conducts audits, and assesses the effectiveness of its internal controls to prevent and monitor corruption risks. This covers all internal systems and includes investigating corruption-related complaints and providing recommendations for corrective and preventative actions for identified risks, with quarterly reports to the Audit Committee.
7. The Company shall provide annual training to all employees on the anti-corruption policy and practices, including related policies such as corporate governance, business ethics, a whistleblowing mechanism, and a code of conduct.
8. The Company shall communicate anti-corruption measures and policies, whistleblowing policies, and requirements regarding ethics and business conduct through various channels, such as the Company's website, annual reports, and other electronic media, to ensure that directors, executives, employees, and business partners of the Company are aware of and comply with them.
9. The Company shall review, monitor, and improve the anti-corruption policy and measures annually or as needed when significant changes occur.

## Operational Requirements

1. The anti-corruption policy applies to all company systems and shall be guided by the principles outlined in the Code of Business Conduct, Corporate Governance Policy, company regulations and operating manuals, and any other guidelines the company may establish. All supervisors are required to communicate and ensure their teams understand the policy, and to oversee its effective implementation.
2. For clarity in handling matters with a high risk of corruption, the company's directors, executives, and employees must exercise caution in the following areas.

### 2.1 Giving and Receiving Bribes

Prohibition of offering or accepting bribes in any form in exchange for business favors, and prohibition of authorizing another person to offer or accept bribes on one's behalf.

### 2.2 Gifts, hospitality expenses, and other costs.

The Company has a policy prohibiting its executives and employees from accepting or offering gifts, hospitality, or any other expenses beyond what is necessary, in accordance with Company regulations.

### 2.3 Political Assistance

The Company is a politically neutral business organization that supports a democratic system with the King as Head of State. The Company has no policy of providing assistance or support to political parties or politicians, directly or indirectly.

### 2.4 Charitable donations or sponsorships

The Company supports community engagement in social and environmental areas to improve quality of life and foster societal stability, or provides financial support for specific activities that benefit the business or enhance the Company's reputation. Charitable donations and financial support must be transparent, lawful, ethical, and free of hidden commercial intent. It is also essential to ensure that donations or support are not used as a pretext for bribery, and must adhere to the Company's regulations.

## 2.5 Facilitation Payment

The Company has no policy of paying facilitation fees in any form, directly or indirectly. It will not undertake any actions, nor accept any, in exchange for expediting business dealings.

## 2.6 Hiring of Government Officials/State Employees

For the appointment of government officials or former government officials, the Company follows these practices:

- There is a due diligence process for individuals the Company recruits for director, advisor, and executive positions to identify potential conflicts of interest before appointment.
- They must not disclose confidential information of the government agency to which they are or were previously affiliated.
- They must not be assigned to contact any government agency to which they are or were previously affiliated.
- Disclose the names and backgrounds of individuals who are or were former government officials appointed to the positions of directors, advisors, and executives of the Company in the annual report.

## 2.7 Conflicts of Interest

The Company has established policies and guidelines for preventing conflicts of interest to guide all decision-making. These policies apply to all directors, executives, and employees and are designed to ensure maximum benefit, avoid conflicts of interest, and prevent the pursuit of personal gain or benefits for related parties through their positions within the Company.

## 2.8 Use of Inside Information

The Company has established policies and guidelines to prevent insider trading and ensure proper understanding of the use of confidential information, to avoid profiting from securities transactions for personal gain or the benefit of others.



Repealed Regulations / Announcements

- Announcement No. 2564/012 Anti-Corruption Policy dated February 19, 2021

Announced on April 1, 2026

(Dr. Apisit Anantanarat)

Director and Chief Executive Officer