



Announcement 087 / 2025

Anti-Corruption Policy

Home Product Center Public Company Limited (the "Company") is committed to conducting its business with integrity, transparency and morality and in compliance with good corporate governance practice, and refusing to accept all forms of corruption. The Board of Directors of the Company has declared its intention to be an Thai Private Sector Collective Action Against Corruption : CAC and requested the Company's personnel to strictly comply with Anti-Corruption Policy.

To ensure that the Company and its employee will proceed properly to prevent and to act against the corruption and to be in line with its intention, the Company, then, according to its internal control principle, has prepared the "Anti-Corruption Policy" in writing to be used as a guideline and for clear operational control system. This Anti-Corruption Policy is made to be in consistent with Thai laws.

Definition

Company	means Home Product Center Public Company Limited and its subsidiaries, affiliates, other companies, over which the Company has power to control, and its business agents.
Company's employee	mean director, executive, and employee of the Company.
Director	means director of the Company.
Executive	means management of the Company from the level of senior vice president onwards.
Employee	means full-time employee from the level of executive downwards.
Trading Partner	means supplier and service provider to the Company, designer, consultant, contractor and sub-contractor.
Stakeholder	means shareholder, customer, Trading Partner, creditor, Employee and government sector.
Corruption	means any type of bribery which here refers to dishonest act requesting or offering /promising to give bribe, extortion or having conflict of interest to public official or private sector officer or relevant person, either directly or indirectly, in terms of money, property or any improper benefit in order for such person to exercise or not exercise his function for the acquisition or maintenance of business or any improper business benefit unless the law, regulation, notification, rule, tradition or business practice has allowed so.

Money-laundering	means the process of concealment of the origins of illegally obtained money or obtained from illicit activities; typically by means of converting into legitimate business or clean sources, thereby avoiding prosecution, conviction, and confiscation of the criminal fund.
Insider trading/dealing	means generally to buying or selling a security, in breach of a fiduciary duty or other relationship of trust and confidence, on the basis of material, nonpublic information about the security. Insider trading violations may also include "tipping" such information, securities trading by the person "tipped," and securities trading by those who misappropriate such information.
Political Contribution	means giving financial support or by any means, either directly or indirectly, to support political activities e.g. giving loan, donation or providing service, advertising to support political party or making contribution to any political campaign of any organizations having close relationship with political party to cause any wrongful reciprocal benefit, etc.
Giving and Receiving Gifts or Other Benefits	means accepting money, objects or any other benefits
Facilitation Payment	means small amount of expenses, unofficially given to government officials to ensure that the government officials would carry out the process or to motivate the speed of the process. The process does not require the discretion of government officials and is an act of duty of those government officials Including the right that the juristic person should already already have under the law such as applying for licenses requesting certificates and receiving public services, etc.
Catering and Hospitality Services	mean expenses for business caterings and hospitality services such as food and beverages, catering in the form of sports and other expenses that are directly related to business operations or commercial practices including giving business knowledge and understanding. The expenses can be approved If the expenses are concluded as reasonable, no business impact and no conflict of interest.

Policies and Guidelines

1. Director, Executive and Employee of the Company are prohibited to request, act or accept all types of corruption in all sectors, both government and private, where the Company's business is involved. We shall jointly promote our morality and responsibility value to be our organizational culture.
2. The risk on corruption act shall be assessed and the consistent practical measure of such risk shall be provided according to the internal control system.
3. Orientation and training course for personnel shall be provided for their understanding on anti-corruption policy, measure and procedure.
4. An internal control system shall be provided for an efficiency and effectiveness of anti-corruption policy which such shall cover financial and accounting information recording process, human resource management process and other processes related to the Company's operation.
5. The compliance of anti-corruption policy must be reported, monitored and reviewed by having suitable operation process provided in order to ensure that the policy is completed, sufficient and updated.
6. A secured communication channel shall be provided to the Company's personnel in order to enable them to request for any suggestion, to inform any trace, to give any recommendation or to complain any corruption matter, provided however, that protection measure on the right of such person shall be given.
7. A communication on the anti-corruption policy shall be conducted both inside and outside the Company for broad compliance, and shall be made to its subsidiaries, affiliates and other companies, over which the Company has power to control and its business agents in order to take the Company's anti-corruption policy to be implemented.
8. To support the exchange of knowledge, experience and good practice between companies being in the same industry and all related persons to be an alliance and to attend the anti-corruption campaign organized by other companies, societies, chambers of commerce or governance sectors.
9. To record and maintain financial and accounting information of the Company correctly, completely, transparently and verifiable by having efficient and trustable internal control system provided under the audit committee's supervision.
10. The Company will not tolerate any activities related to money-laundering and/or insider trading/dealing from the associates of all levels, trading partners or any stakeholders.

Measures and Guidelines

■ Receiving and Giving Gifts or Other Benefits

It is prohibited to receive or give any gift or benefit unless such is made correctly, openly and transparently and not in violation of good moral, laws and practical regulations of the Company as well as government sectors, state enterprises and other related sectors and suitable with situation, season and local tradition and not used as an excuse for corruption and shall not cause any conflict between personal benefit and company benefit. Also, it is prohibited to receive or give any gift or benefit if such will affect the Company's operation.

- **Facilitation Payment**

Facilitation payment is considered as a risk for possible corruptions. The Company does not have any policy on unofficially paying facilitation payment to any government officials, both directly and indirectly in exchange for facilitating business operations or for any government officials to help expedite the process of obtaining services from any governmental agencies, departments or organizations.

- **Catering and Hospitality Services**

The Company prohibits from hosting or attending any catering events during the process of procurements of products or services, bidding or auctioning except that the caterings are for other special events according to social norms, customs, and traditions in order to maintain healthy business relationships while not impacting the businesses or causing conflict of interest.

- **Donation for Charity or Sponsorship**

Such must be performed correctly, directly and transparently and not in violation of a good moral, laws, practical regulations of the Company as well as other government sectors, state enterprises and agencies related and must be consistent with social, community and environmental policies or any activity to promote the sustainable development of the Company or any activity to create social benefit for society. Moreover, such shall not be used as an excuse for any type of corruption and have no hidden objective to cause any advantage or motivation in business benefits and shall not cause any conflict between personal benefit and company benefit. In this regard, letter of approval for such matter is required and the objective and recipient name/sector must be clearly provided with related document attached in order to be proposed to an authorized person for his approval before proceeding.

- **Political Contribution**

The Company is neutral in political matter and has no political contribution policy and no action to show that the Company is interested in any particular political party or political group. The Company's personnel have their right and freedom given by the Constitution and other relevant laws e.g. vote for election. The Company's personnel shall not use any property of the Company or provide any service on behalf of the Company to support any political activity or shall not perform any action to cause others to understand that the Company is related to or supports any particular political party or political group.

- **Purchasing Inspection and Making Agreement**

Working plan, policy and authorization must be clearly specified and controlling measure must be clearly provided in order to be complied by related employees. In case the work operation is delayed, the approval must be obtained as indicated in the regulation. Also, the service center should be established in order to verify and confirm its correction regularly.

However, to execute the anti-corruption measures in the organization widely, the Company shall establish the supporting process for sufficient prevention of corruption e.g. inspection process in sale and marketing, purchasing, human resource management, financial and accounting etc. Moreover, practical regulations for internal use must be supervised in which the prevention of corruption must be efficiently covered.

Duties and Responsibilities

■ Board of Directors

The Company has endorsed the Board of Directors to oversee and take responsibility for the consideration and approval of anti-corruption policies, as well as to control the support system on anti-corruption for its effectiveness and to ensure that the executive and employee in all levels have realized and concerned on anti-corruption issue. The Board of Directors shall cultivate such policy as the organizational culture and urgently consider the matter related to the corruption for timely supervision and operation.

■ Audit Committee

The scope of duties and responsibilities includes auditing financial and accounting statement, internal control system, internal audit system and risk management related to contingent risk caused by the corruption in order to ensure that the Company's operation is circumspect, suitable and efficient. Also, the Audit Committee shall urgently consider the matter related to the corruption for timely supervision and operation.

■ Managing Director, Management Team and Executive

Responsibility is assigned to stipulate the system and to promote and support anti-corruption policy to be communicated to all employees and related persons. Moreover, they have to consider the suitability of all systems and measures to be consistent with the change of business, rule, regulation and law as well as to propose any urgent matter related to the corruption (if any) to the Audit Committee and the Board of Directors.

■ Risk Management Committee

The assigned responsibility is to supervise and support the operation of risk management for sufficient and appropriate anti-corruption.

■ Internal Audit Office

The main duties involve revising and verifying the Company's performance whether or not such is correct as indicated in related policy, guideline, authorization, practical regulation and law or related regulation in order to ensure that the control system is suitably and sufficiently provided to prevent possible risk of corruption. Internal Audit Office has to report the Audit Committee as well as to inform and follow up on the outcome with related department to ensure that the management team has already improved and corrected such issue.

■ Employee

The responsibility of each employee is to perform their functions to be consistent with this policy. In case any suspicion or any violation is found, such must be reported to supervisor or through reporting channel provided in the whistleblower procedures of the Company.

Whistleblowing Channel

The Company has established whistleblower procedures for stakeholders to report concern or submit complaints with supporting evidence through the following official channel:

- Submit reports via the whistleblowing form located on the Company's website under Corporate Governance Section > Whistleblowing (https://hmpo.listedcompany.com/whistle_blowing.html). Reporting channel is operated by shareinvestor, an independent service provider who serve as intermediaries between the Company and the complainant.
- Direct communication with the Board of Directors, bypassing the Company's management. This channel allows stakeholders to express opinions on business operations, as well as to submit complaints or whistleblowing reports, via the Company's website under the "Contact Us > Contact the Board of Directors" section (https://hmpo-th.listedcompany.com/contact_board.html).
- Direct communication with the Audit Committee, bypassing the Company's management. This channel allows stakeholders to express opinions on business operations, as well as to submit complaints or whistleblowing reports, via the Company's website under the "Contact Us > Contact the Audit Committee" section (https://hmpo-th.listedcompany.com/contact_audit.html).
- Submit reports via postal mail address to Audit Committee through Internal Audit Office or Human Resources Department to the Company's address below:

Home Product Center Public Company Limited

31 Prachachuen-Nonthaburi Rd., Bangkhen, Muang Nonthaburi, Nonthaburi 11000

Whistleblower Protection

- Whistleblower is not required to disclose their identity and are allowed to submit the form anonymously.
- If whistleblowers choose to identify themselves, the Company will maintain the confidentiality of their name, address, or any other information that could reveal their identity. This is to ensure their safety and prevent any adverse impact on their employment or personal well-being.
- Accused individuals and other related parties who have not been proven guilty will be treated fairly, with the right to present their case.
- The Company will not discipline, demote, or penalize whistleblowers or informants, even if the investigation does not result in proof of wrongdoing.
- Any form of retaliation against whistleblowers, informants, or witnesses, whether during or after the investigation, is strictly prohibited. The Company upholds a zero-tolerance policy for retaliation, and any violators will be subject to disciplinary or legal action.
- The Company, supervisor or leader are responsible for exercising sound judgment to protect whistleblowers, witnesses, and informants involved in the investigation from harm or unfair treatment arising from their participation in reporting, testifying, or providing information.

Confidentiality

- Access to information regarding complainants or whistleblowers, accused parties, investigation reports, and evidence must be strictly limited to authorized personnel only.
- Individuals involved in handling complaints must maintain strict confidentiality of all received information and must not disclose details to any person, except when necessary for operational purposes or as required by law.
- The disclosure of investigation reports to unauthorized individuals is strictly prohibited to prevent potential damage to the reputation of accused individuals who may later be found innocent, and to mitigate legal risks to the company.
- If approached by external parties seeking information, the appropriate response is: "I am not in a position to discuss or disclose information regarding this matter."

Whistleblowing Handling & Investigating Process

■ Receipt of Complaints

Relevant departments receive complaints through designated channels and verify the completeness of preliminary information, including date, time, incident details, involved parties, and initial supporting documentation.

■ Preliminary Assessment and Screening

The credibility and severity of complaints are evaluated. If sufficient grounds exist, the investigation will proceed to the next phase.

■ Investigation

Facts are gathered from all relevant parties, which may include interviewing involved individuals, examining documents, reviewing system access, and analyzing financial transactions.

■ Reporting and Recommendation

Investigation findings are reported to authorized decision-makers, such as the Audit Committee or Board of Directors. Appropriate corrective action are recommended, addressing individual, systemic, and procedural issues. These may include disciplinary actions, process improvements, or additional training to address the root causes of misconduct and mitigate future risk.

Penalties

Any personnel of the Company violating or not complying with Anti-Corruption Policy shall be considered to be in breach the Company's order and regulation and he/she shall be considered for appropriate disciplinary action as indicated in the Company's regulation or related criteria. If such actions constitute a legal violation, legal penalties may also apply. Furthermore, the Company maintains a firm position that it will not demote, penalize, or take any negative action against directors, executives, or employees who refuse to participate in corrupt practices, even if such refusal results in lost business opportunities for the company.

How to Communicate and Publish Anti-Corruption Policy and Practical Regulation

The Company ensures comprehensive and continuous communication of its anti-corruption policies and measures to all relevant stakeholders, including directors, executives, employees, subsidiary company, associate company, controlled entities, business representatives, and business partners. This communication occurs through diverse channels such as internal media, company websites (both internal and external), annual reports, electronic correspondence, and appropriate public disclosures, ensuring all sectors understand and correctly implement the Company's anti-corruption guidelines in a consistent manner.

Furthermore, the Company prioritizes regular training on anti-corruption policies and measures, including the use of reporting channels for inappropriate behavior, for employees at all levels and relevant external parties. This training aims to build knowledge, understanding, and awareness of individual responsibilities. Training is conducted in various formats, including orientation for new employees, annual refresher courses, and additional sessions when policies are updated or modified.

The Company encourages directors and executives to take an active role in providing knowledge and setting good examples in policy compliance, thereby fostering an organizational culture founded on good governance principles that rejects corruption in all forms. When the Company develops or updates relevant policies and measures, appropriate communication and disclosure will be implemented to ensure new or revised content is effectively understood and implemented.

This announcement is effective from 1 January 2025 onwards.

For mutual acknowledgement,



(Mr. Weerapun Ungsumalee)
Representative of the Board of Directors,
and Managing Director