



Measures/Guidelines for Implementing the Anti-Corruption Policy

(Anti-Corruption Procedure)

Don Muang Tollway Public Company Limited

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1. Principles

Don Muang Tollway Public Company Limited places great importance on anti-corruption and has continuously supported and encouraged all employees to act with integrity in accordance with the Anti-Corruption Policy as approved by the Board of Directors. This Anti-Corruption Policy has been established in line with the Company's Corporate Governance Policy to reflect the company's commitment to conducting business with fairness, integrity, transparency, and accountability, and in full compliance with relevant laws and regulations. Accordingly, this Anti-Corruption Procedure is established to serve as a practical framework to prevent, detect and mitigate corruption risks in all its forms.

2. Anti-Corruption Procedure

The company has set out these procedures and operational guidelines for monitoring and control to prevent and mitigate the risk of corruption as follows:

1. The company requires that the internal audit, internal control, and risk management departments that oversees the company's core activities support the Anti-Corruption Policy by ensuring accurate and honest recordkeeping, risk assessments, proper disbursement of funds, and whistleblowing channels. They are also responsible for regularly reporting audit results and findings to the Board of Directors or relevant committees, including making recommendations for improving these measures as appropriate.
2. The company shall ensure that internal external auditors who audit company operations include examination of transactions vulnerable to corruption. They are required to evaluate the effectiveness of the internal control system and provide recommendations for improvement. Additionally, the audit findings shall be presented to the Audit Committee for review and further action to enhance the efficiency and transparency of the internal control system to prevent corruption.
3. The company shall conduct an appropriate corruption risk assessment that aligns with the nature of its business operations on a regular basis. This is to prevent and mitigate corruption by identifying risk-prone activities. The assessment shall identify activities with heightened corruption risks,

evaluating their likelihood and potential impact of such risks. Establish anti-corruption measures that are appropriate to the assessable level of risk. Follow up on the results of risk assessment implementation plans, and report to the Risk Management Committee.

4. The company shall ensure that the anti-corruption policy includes a reporting and whistleblowing process with clear registration and tracking, shall be communicated through multiple platform such as orientation training for new employees, seminars, and briefings. This includes distribution of anti-corruption information via the company website, intranet, or other means. Executives and employees must acknowledge and understand these practices and take real action accordingly.
5. The company shall ensure that the anti-corruption policy includes communication systems for reporting and registering reports via multiple channels such as telephone, email, business meetings, or through affiliated business partners, including third parties such as media outlets (e.g., reviews, articles, websites, reports, advertisements). This is to ensure clear communication of the policy and proper implementation in practice.
6. The company shall ensure that all standard contract templates must contain anti-corruption clauses, requiring contractual parties not to offer, promise, or give bribes, inducements, benefits, or money to executives, employees, representatives, or agents of the company.
7. The company shall provide internal and external audits to monitor compliance with contracts and to evaluate anti-corruption practices. The company shall also implement measures to promote understanding among all relevant stakeholders about the company's Anti-Corruption Policy and build a culture of integrity and transparency in the organization.
8. The company shall enforce penalties or disciplinary action against any violations of anti-corruption practices, including the prevention of bribery or corruption-related behavior.
9. The company has a policy prohibiting directors, executives, and employees from requesting, offering, giving, or receiving gifts, gratuities, or any payments that exceed reasonable limits or may be deem inappropriate, particularly in interaction with government officials or business counterparts.
10. Any individual found to have committed a corrupt act shall be considered in breach of company rules, ethics, or employment obligations. Employees will be subject to disciplinary procedures, and, where applicable, may also face legal prosecution.
11. The company shall not engage in offering, promising, or giving bribes or inducements to influence government officials or business partners. This includes refraining from facilitation payments or

other improper benefits are intended to gain favor, influence decisions, or obtain advantages, such as government contracts, procurement, or business negotiations.

12. The company shall establish an effective monitoring and reporting mechanism for anti-corruption activities. This includes complaint handling, investigations, and fair treatment of whistleblowers or those who report in good faith. All reports must be kept confidential, and no retaliatory actions will be tolerated against that reporting corruption or cooperating in investigations.
13. The company shall uphold the principles of ethics and protect employees involved in reporting corruption. This includes protection for whistleblowers or cooperating persons, who report in good faith, according to the company's Whistle Blowing Procedure.
14. The company shall establish clear procedures and channels for receiving whistleblower complaints. This includes channels for employees or external parties to report suspected corruption or unethical behavior, and all such reports must be handled with fairness and transparency in accordance with the Whistle Blowing Procedure.
15. The company shall continuously promote an anti-corruption culture and raise awareness among employees and stakeholders. Training and educational activities will be held regularly to instill values of integrity and compliance with the Anti-Corruption Policy.
16. The company shall review and assess anti-corruption policies and implementation procedures regularly. This is to ensure the policy remains effective and relevant in changing circumstances, and to adjust if necessary to ensure legal and ethical compliance.
17. The company shall regularly review and revise the Anti-Corruption Policy to ensure its appropriateness. This review shall be conducted at least once a year to ensure that the policy remains suitable, up-to-date, and consistent with the company's business changes as well as applicable laws, regulations, and relevant standards in effect from time to time.