



Anti-Corruption Policy and Procedure

PRIMO SERVICE SOLUTIONS PUBLIC COMPANY LIMITED

496 Moo 9 Sukhumvit 107 Road, Samrong Nuea,

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Anti-Corruption Policy and Procedure

Primo Service Solutions Public Company Limited and its affiliated companies (the “Company”) are committed to conducting business with integrity and ethics, and to managing operations transparently in accordance with the principles of good corporate governance to ensure efficient business operations and responsibility toward society and all stakeholders. In this regard, the Company has established appropriate guidelines for the conduct of the Board of Directors, management, and employees under its business ethics and employee code of conduct, which form part of the Company’s corporate governance. In addition, the Company has joined the Thai Private Sector Collective Action Against Corruption to demonstrate its intention and commitment to combating corruption in all forms. The Company has therefore established the “Anti-Corruption Policy and Measures” as a guideline for directors, executives, all employees, subsidiaries, and associated companies to uphold and comply with. This reflects the Company’s firm commitment and clear intention not to tolerate corruption in any form.

Definitions

“Corruption” means any act carried out for unlawful gain or benefit, including bribery, political contributions, gift giving or hospitality, charitable donations, entertainment expenses/other expenses, by offering, promising, pledging, demanding, giving, or receiving money, assets, or any other improper benefit to or from government officials, state employees, government agencies, private entities, or persons with duties and responsibilities, whether directly or indirectly and in any form, in order to cause such agencies or persons to perform or refrain from performing their duties so as to obtain or retain business benefits for the Company, oneself, family members, friends, acquaintances, or for improper business advantage, particularly where such acts arise from abuse of authority, violation of the law, or any act indicative of corruption, except where permitted by law, tradition, custom, or normal business practice.

“Bribery” means any asset of value or other benefit given to an individual or group to induce such person to improperly perform, refrain from performing, or delay the performance of a duty.

“Gift Giving” means the giving of money, valuables, or services for the purpose of showing support to government officials, state employees, or government agencies, and to support business operations, promote the Company’s brand or reputation, which benefits the establishment of business credibility and helps strengthen business relationships.

“Charitable and Public Benefit Donations” means the giving of money, products, valuables, or services in the form of donations.

“Political Assistance or Support” means the provision of financial support, items, and/or participation in activities to obtain business or commercial advantages.

“Sponsorship” means sponsorship funds paid for business purposes or for promoting the Company’s brand or reputation.

“Conflict of Interest” means a situation in which a person holding a position of responsibility has a conflict between personal interests and professional interests, resulting in the inability to perform duties impartially. In other words, it refers to a conflict between personal interests and public interests, being a situation or act in which personal interests affect decision-making or the performance of duties and responsibilities, thereby impacting the overall interest, such as using one’s position to benefit oneself or associates, or having overlapping interests.

“Facilitation Payment” means a small amount of unofficial payment made to government officials or state employees solely to ensure that such officials or employees carry out a process, or to expedite the performance of such process, where the process does not require the discretion of the government official or state employee and is a lawful duty of such official or employee. This also includes rights to which a juristic person is legally entitled, such as obtaining permits, certificates, or public services.

“Employment of Government Officials or State Employees” (Revolving Door) means the employment of former government officials by the Company, or the assignment of the Company’s personnel to work on government policy matters, which may give rise to conflicts of interest for individuals holding roles and responsibilities in both organizations.

“Affiliated Companies” means the subsidiaries and associated companies of Primo Service Solutions Public Company Limited.

“Director” means directors of Primo Service Solutions Public Company Limited, as well as directors of its subsidiaries and associated companies.

“Employee” means permanent employees, probationary employees, daily employees, and employees under special employment contracts whom the Company has agreed to employ with remuneration.

“Government Official or State Employee” means political office holders, civil servants, or local government employees holding positions or receiving regular salaries, employees or personnel working in state enterprises or government agencies, local administrators and local council members who are not political office holders, local administrative officers under the law governing local administration, and shall also include directors, subcommittee members, employees of government departments, state enterprises, or government agencies, as well as individuals or groups of persons exercising or entrusted with administrative authority of the State.

“Business Partner” means a person having transactions with the Company to support or promote the Company’s business operations.

“Business Associate” means any person or juristic person with whom the Company has business relations, including governments, government agencies, private sector organizations, and others.

Anti-Corruption Policy

The Company has a policy of not supporting corruption in any form and prohibits directors, executives, and employees at all levels from engaging in, accepting, or supporting corruption by demanding, accepting, or participating in corruption, whether directly or indirectly, for the benefit of the organization, themselves, family members, friends, acquaintances, or for business advantage. This policy covers all businesses and all relevant units of the Company to prevent any person from performing or refraining from performing duties for the purpose of obtaining or retaining improper business benefits. The Company shall not demote, punish, or impose negative consequences on employees who refuse to engage in corruption, even if such refusal results in the loss of business opportunities for the Company. In addition, compliance with this Anti-Corruption Policy shall be reviewed regularly to ensure consistency with changes in business operations, rules, regulations, legal requirements, and good moral principles. Any violation involving support for, assistance with, or participation in corruption shall be subject to disciplinary action in accordance with the Company’s regulations and/or applicable laws.

Roles, Duties, and Responsibilities

1. **The Board of Directors** shall be responsible for considering and approving the Anti-Corruption Policy and overseeing the establishment of an effective anti-corruption system to ensure that management recognizes the importance of and implements this Anti-Corruption Policy as part of

2. **The Audit Committee** shall be responsible for overseeing internal controls covering both financial and operational aspects, financial reporting and accounting systems, and monitoring the implementation of risk management systems, audit systems, and adequate internal control systems. The Committee shall ensure compliance with anti-corruption measures in accordance with the Company's policies, relevant regulations, and laws to ensure that the Company's operations are prudent, appropriate, and efficient. The Committee shall also monitor the establishment of a complaint-handling and whistleblowing system relating to acts involving persons within the organization in a transparent and fair manner for all parties concerned, consider preventive and corrective measures, and further propose them to the Board of Directors.
3. **The Risk Management Committee** shall be responsible for supervising and supporting the implementation of corruption risk management to establish preventive measures and reduce risks, including reviewing corruption risk management measures to ensure their adequacy and appropriateness.
4. **The Chief Executive Officer** shall be responsible for implementing the Anti-Corruption Policy by establishing systematic anti-corruption operations and promoting and supporting the Anti-Corruption Policy to communicate it to employees and all relevant parties, including reviewing the appropriateness of related systems and measures to ensure consistency with changes in business operations and circumstances.
5. **The Internal Audit Department** shall be responsible for auditing and reviewing operations to ensure compliance with policies, guidelines/regulations, and laws to ensure that there are effective control systems that are appropriate and sufficient for potential corruption risks, and shall report to the Audit Committee.
6. **The Legal Department** shall be responsible for providing consultation and recommendations regarding anti-corruption matters, supervising anti-corruption operations, and disseminating knowledge and understanding regarding anti-corruption practices.
7. **The Anti-Corruption Risk Management Working Committee** shall be responsible for developing risk assessment systems and arranging for internal departments to assess corruption risks, compiling measures and guidelines for corruption risk control as considered and summarized by the departments, and presenting the risk assessment results to the Risk

Management Committee, including reviewing corruption risks to ensure appropriateness in line with changing circumstances.

8. **The Human Resources Department** shall be responsible for disseminating knowledge, creating understanding, and encouraging employees at all levels to comply with the Anti-Corruption Policy and promoting it as part of the corporate culture. No employee shall be demoted, penalized, or negatively affected for refusing to engage in corruption, even if such refusal results in the loss of business opportunities for the Company. The Department shall also establish disciplinary measures, as appropriate on a case-by-case basis, for persons who violate or fail to comply with the Anti-Corruption Policy.
9. **Executives, managers, and supervisors at all levels** shall be responsible for encouraging, promoting, supporting, and supervising employees under their authority to perform their duties in compliance with the Company's Anti-Corruption Policy, as well as serving as good role models. They shall also review the appropriateness of various systems and measures to ensure consistency with changes in business operations, regulations, and legal requirements, and shall perform their duties with transparency and ethics.
10. **All employees, other persons or juristic persons performing work on behalf of the Company, or persons hired under temporary contracts** shall strictly comply with this Policy by adopting the principles of the Anti-Corruption Policy as operational guidelines throughout the organization.

Measures/Guidelines for Anti-Corruption

The Board of Directors, executives, employees at all levels, and all relevant departments, including other persons or juristic persons performing work on behalf of the Company, or persons hired under temporary contracts, shall strictly comply with the Company's Anti-Corruption Policy and Code of Business Conduct as follows:

1. General Guidelines

- 1) Directors, executives, and employees shall neither engage in nor support fraud or corruption in any form and shall strictly comply with anti-fraud and anti-corruption measures.
- 2) Promote a corporate culture based on honesty and fairness.

- 3) Provide communication and training for employees within the organization to encourage employees to perform their duties honestly and to adopt the principles and code of conduct under the corporate governance policy as operational guidelines throughout the organization.
- 4) The Company shall establish personnel management processes reflecting the Company's commitment to anti-fraud and anti-corruption measures, from recruitment, training, performance evaluation, compensation, and promotion.
- 5) The Company shall arrange for internal audits to ensure that the internal control system helps the Company achieve its established objectives, including auditing the operations of all departments to ensure compliance with requirements and regulations, identifying deficiencies and weaknesses, and providing recommendations for improving operational systems to achieve efficiency and effectiveness in accordance with good corporate governance principles and anti-corruption policies/measures.
- 6) The Company shall ensure fairness and provide protection, to the fullest extent possible and within the scope of its authority and responsibility, to employees who refuse or report corruption related to the Company through any measures.
- 7) Cooperate with government authorities in requiring all entities contracting with the public sector to disclose statements of income and expenses to the National Anti-Corruption Commission (NACC).
- 8) This Anti-Corruption Policy and Guidelines are supplementary to the Code of Conduct and have been approved by the Board of Directors. They shall be regarded as part of the work discipline of the Company's directors, executives, and employees. Any person who neglects, omits, or intentionally fails to comply with the Company's policies and good practices shall be deemed to have committed a disciplinary violation and shall be subject to penalties in accordance with the Company's regulations and may also be subject to legal penalties if such act violates applicable laws.

2. Guidelines for Conduct in High-Risk Corruption Situations

To ensure clarity in conducting matters involving high risks of fraud and corruption, the Company's personnel must exercise caution and comply with the Company's Code of Conduct and the following guidelines:

2.1 Guidelines on Receiving/Giving Gifts, Tokens, and Hospitality (Gifts and Hospitality)

2.1.1 Receiving Gifts, Tokens, and Hospitality

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- 1) It is prohibited to receive or solicit bribes in any form in exchange for improperly granting business benefits, and no person may assign another person to receive bribes on their behalf.
- 2) Directors, executives, and all employees must not demand or accept gifts, hospitality, or other expenses from customers, business partners, or related parties under any circumstances that may affect impartial decision-making in the performance of duties or create conflicts of interest.
- 3) The acceptance of items, gifts, tokens, or hospitality on traditional or customary occasions may be permitted, provided that such items have a value not exceeding THB 3,000 and/or are necessary for maintaining good relationships between individuals or organizations.
- 4) Requests for support in the form of money or items, or support relating to promotional activities, which do not constitute bribery and are not for the improper benefit of any individual, may be made on an organization-to-organization basis only and must be approved in writing by an authorized person at the department manager level or above.
- 5) Executives at the department manager level or above shall act as representatives of the organization in receiving items or other benefits and shall deliver such items or benefits to the Head of the Corporate Social Responsibility (CSR) Department within 3 business days from the date of receipt.
- 6) To prevent conflicts of interest, the Company strictly prohibits employees or persons not assigned by the Company from acting as representatives in receiving items or other benefits.
- 7) In cases where refusal is not possible and it is necessary to accept items or other benefits beyond the above criteria, such acceptance must be reported to a supervisor at the department manager level or above, and the items shall be delivered to the Head of the Human Resources (HR) Department for further appropriate action. Records shall be maintained of the items received and the actions taken in relation to such items.

2.1.2 Giving Gifts, Tokens, and Hospitality: No person shall give or assign another person to give bribes in any form in exchange for improperly granting business benefits.

- 1) The giving of items, gifts, tokens, or hospitality on festive or customary occasions generally practiced among people, or in accordance with traditions that do not create conflicts of interest or violate legal requirements, may be permitted provided that such items have a value not exceeding THB 3,000 (Three Thousand Baht) or are reasonable for the recipient. Prior approval must be obtained from the authorized supervisor before proceeding, and the recipient must be clearly specified in the request for approval of such expenses.

2.2 Charitable Contributions and Sponsorships

The Company has established the following guidelines regarding charitable contributions, public benefit contributions, and sponsorships:

- 1) They must be conducted transparently, legally, and ethically, and must not constitute any act that may cause harm to society as a whole.
- 2) Charitable contributions, public benefit contributions, and sponsorships must not be used as a pretext for bribery.
- 3) Charitable contributions, public benefit contributions, and sponsorships must be approved in accordance with the approval authority by specifying the recipient organization, objectives, date, and value of the items/services provided, together with supporting documents relating to the supported or recipient organization, such as the list of founders, directors, etc.
- 4) There must be evidence of receipt of items, receipts, or other evidence of payment, such as a letter of appreciation.
- 5) In the event of any doubt that may have legal implications, written consultation shall be sought from the Legal Department, while other significant matters shall be subject to the discretion of management.

2.3 Political Contribution

- 1) The Company has a policy of conducting business in a neutral manner and shall not participate in or support any political party.
- 2) The Company's resources shall not be used, whether directly or indirectly, to unlawfully support any political party or politician or in any manner leading to bribery.
- 3) The Company supports the legal political rights and freedoms of all personnel; however, personnel must be aware not to undertake any actions, including the use of the Company's resources, for political activities or operations that may cause damage to the Company through involvement in and/or provision of political assistance.

2.4 Facilitation Payment

The Company has no policy of making facilitation payments in any form, whether directly or indirectly. The Company shall not undertake or accept any act in exchange for facilitating business operations.

2.5 Revolving Door

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- 1) The Company shall not employ or appoint government officials or state employees who are still in office to positions that may give rise to conflicts of interest or serve as compensation for any benefit.
- 2) A cooling-off period of 2 years, or such other period as specifically prescribed by law, shall apply to the appointment of former government officials or state employees who have left office, or persons who previously worked for regulatory authorities directly related to the Company.
- 3) The Company shall implement a background screening process for persons or former government officials or state employees undergoing recruitment prior to appointment as advisors, directors, or senior executives to identify potential conflicts of interest.
- 4) The Company shall disclose the names and backgrounds of former government officials or state employees appointed as advisors, directors, or senior executives of the Company, together with the reasons for such appointments, in the Company's annual report.

2.6 Conflict of Interest

- 1) Operations shall be conducted with integrity and ethics, while promoting integrity and ethics at all levels of the Company, including monitoring and resolving any conflicts of interest that may arise within the Company.
- 2) Personnel must devote themselves and their time fully to the Company's business. In cases where it is necessary to undertake other work outside working hours for additional income or other purposes, such work must:
 - a. not violate the law or be contrary to public order and good morals;
 - b. not conflict with the interests of the Company;
 - c. not involve a business that competes with or is similar in nature to the Company's business;
 - d. not adversely affect the reputation or business operations of the Company;
 - e. not involve the use of the Company's confidential information; and
 - f. not affect the performance of their duties.
- 3) In the event of hiring persons who previously worked for competitors or government agencies:
 - a. The Company must inspect, verify, and/or require such persons to submit confidentiality agreements previously made with competitors or government agencies, and shall not take any action causing such persons to breach those agreements, which may result in legal proceedings. In this regard, the employment of government employees shall comply with the Guidelines on the Employment of Government Employees (Clause 2.5).

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b. Conflicts between personal interests and the Company's interests in dealings with business partners and other persons must be avoided.

c. Personnel shall not engage in businesses of the same nature as, or in competition with, the Company's business, whether for personal benefit or the benefit of others, nor act as shareholders with controlling authority over management that may directly or indirectly damage the Company, or become partners, decision-making shareholders, or executives in businesses competing with or similar to the Company. However, where such situations cannot be avoided, the matter must be reported immediately to the supervisor.

3. Guidelines on Human Resource Management

To ensure that the Company's Anti-Corruption Policy and measures are supported and effectively implemented, the Company has established the following guidelines:

- 1) This Anti-Corruption Policy shall cover all human resource management processes, including recruitment or personnel selection, promotion, training, and employee performance evaluation.
- 2) Supervisors at all levels shall communicate and create understanding among employees for application in business activities under their responsibility and shall supervise compliance with the policy effectively.
- 3) Directors and executives at all levels must serve as good role models in complying with the Anti-Corruption Policy and promote serious and continuous adherence to the Anti-Corruption Policy and measures among employees at all levels, as well as encourage such practices to become part of the corporate culture.
- 4) The Company shall not demote, punish, or impose negative consequences on employees who refuse to engage in corruption, even if such refusal results in the loss of business opportunities for the Company.
- 5) Directors, executives, and employees at all levels must not ignore or overlook any acts that may violate anti-corruption measures. The Company shall provide whistleblowing channels and protection for reporters. Employees who wish to report information or clues, as well as those seeking guidance regarding compliance with anti-corruption measures, shall receive protection from the Company.
- 6) This Anti-Corruption Policy and Guidelines shall form part of the work discipline of the Company's directors, executives, and employees. Any person who neglects, omits, or

intentionally fails to comply shall be deemed to have committed a disciplinary violation and shall be subject to penalties in accordance with the Company's regulations and may also be subject to legal penalties if such act violates applicable laws.

4. Risk Assessment

The Company shall conduct risk assessments of the Company's transactions that may involve procedures or processes with corruption risks. The Company's corruption risk management policy shall be reviewed at least once a year, including reviewing existing risk management measures to ensure their appropriateness in preventing risks or reducing risks to an acceptable level.

5. Internal Control System and Financial Reporting

5.1 The Company's management shall be responsible for preparing financial reports that are accurate, complete, timely, and prepared in accordance with generally accepted accounting standards.

5.2 The Company shall establish an internal control system to provide reasonable assurance regarding operational efficiency, reliability of financial reporting, and compliance with policies, regulations, and requirements as follows:

- 1) Establish clear written rules, regulations, and operating procedures.
- 2) Designate authorized persons for payment approvals and define responsible approval limits.
- 3) All accounting records, receipts and payments, and expenses of all types must be supported by clear documentary evidence, approved in accordance with the authority limits, and recorded accurately, completely, and timely in accordance with the Company's requirements.
- 4) The Company does not permit false, improper, incomplete, or inaccurate records, or accounting manipulation, and there must be no off-book accounts used to support or conceal improper payments.
- 5) Maintain accounting records and supporting documents systematically in accordance with the Company's requirements and relevant laws for ease of retrieval. Upon expiration of the retention period, responsible employees must arrange for proper destruction methods suitable for each type of information and document.
- 6) Establish internal mechanisms to monitor, supervise, and control the financial reporting system in compliance with accounting standards, including improving operational processes in all departments to enhance efficiency in preventing corruption and misconduct.

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- 7) Promote awareness and discipline in performing duties honestly, transparently, and ethically, with executives and employees at all levels participating in the prevention and anti-corruption efforts to ensure that the organization remains transparent and free from corruption.
- 8) Promote and encourage subsidiaries/associated companies, agents, brokers, business partners/contractors to comply with this Policy and these Guidelines and to have no involvement in corruption.

8. Training and Communication

To ensure effective implementation of the Anti-Corruption Policy and measures, the Company has established the following guidelines:

8.1 Communication

- 1) Arrange for communication and dissemination of the Anti-Corruption Policy/guidelines to relevant parties, including directors, executives, employees, and all related stakeholder groups.
- 2) Communicate the penalties for non-compliance with the Anti-Corruption Policy and measures, including communicating the policy of not demoting, penalizing, or imposing negative consequences on directors, executives, and employees who refuse to engage in corruption, even if such refusal results in the loss of business opportunities for the Company.
- 3) Disclose information to the public regarding the Company's Anti-Corruption Policy and measures.

8.2 Training

- 1) Provide orientation and training regarding the Anti-Corruption Policy and measures to directors, executives, and employees.
- 2) Encourage directors and executives to participate in educating employees in order to serve as good role models in complying with the Anti-Corruption Policy and measures.
- 3) Disclose information to the public regarding the Company's Anti-Corruption Policy and measures.

8.3 In cases of questions or suggestions, to support the development and enhancement of anti-corruption measures, inquiries or information should be reported to supervisors or the Head of the Audit Department for joint consideration and proper action.

8.4 The Company regards these ethics and anti-corruption practices as part of work discipline, which all directors, executives, and employees must strictly comply with. Any person who violates or fails to comply shall be subject to penalties in accordance with the Company's rules and regulations and/or applicable laws.

9. Compliance Oversight and Internal Audit

- 1) The Board of Directors encourages and supports management to attend Board meetings to provide opportunities to express opinions or present reports on issues for consideration of effective and efficient solutions.
- 2) The Company requires the Internal Audit Department to monitor and review the appropriateness, adequacy, and effectiveness of anti-corruption measures to provide recommendations and discuss improvements with the relevant management to ensure suitability for the Company's business operations. The results shall be reported to the Audit Committee and/or the Board of Directors at least once a year.
- 3) The Company has established procedures for reporting audit results and urgent matters as follows:
 - a. The Internal Audit Department shall report audit results and findings to the Audit Committee and notify the relevant parties.
 - b. In the event of urgent matters, the Internal Audit Department shall report directly to the Chairman of the Audit Committee and/or the Chief Executive Officer immediately.
 - c. The Audit Committee shall further report significant audit findings to the Board of Directors.

10. Penalties for Violations or Non-Compliance with the Anti-Corruption Policy

- 1) If any director violates or fails to comply with this Policy, the Company shall appoint an investigation committee to promptly investigate the facts relating to such conduct. The investigation committee shall consist entirely of the Company's independent directors. If, in any investigation, the director who violates or fails to comply with this Policy is an independent director, such independent director shall not participate in the investigation committee for that particular case. In conducting the investigation, the investigation committee shall consider evidence, facts, and surrounding circumstances as appropriate for each case and shall submit the investigation report, including recommendations on penalties, to the Board of Directors for further consideration. If such violation or non-compliance constitutes an unlawful act, penalties shall be imposed in accordance with the law.

In cases where a director of an affiliated company commits or participates in wrongdoing and such affiliated company does not have independent directors, the Chairman of the affiliated company shall participate in the investigation committee, unless the Chairman is the offender or involved in the wrongdoing. In such case, the Board of Directors shall appoint another director who is not involved in the wrongdoing to serve on the investigation committee instead. The investigation committee shall submit the investigation results and recommendations on penalties to the board of directors of the relevant affiliated company for further consideration.

- 2) If executives or employees of the Company violate or fail to comply with this Policy, disciplinary action shall be imposed. The disciplinary measures shall depend on the facts and surrounding circumstances. If such violation or non-compliance constitutes an unlawful act, penalties shall be imposed in accordance with the law.

11. Reporting Corruption Complaints and Protection of Whistleblowers

The Company has established systematic, transparent, and fair procedures for considering and investigating complaints in order to ensure that whistleblowers or complainants have confidence and trust in a fair investigation process in accordance with the Whistleblowing Policy through the following channels:

- 1) By mail: Chairman of the Audit Committee
Primo Service Solutions Public Company Limited
496 Moo 9, Samrong Nuea Subdistrict, Mueang Samut Prakan District, Samut Prakan Province
10270
- 2) E-mail : Whistleblower@primo.co.th
- 3) Website : www.primo.co.th

All complaints shall be treated confidentially, and complainants may submit complaints/report clues through more than one channel without the need to disclose their identity as complainants/whistleblowers.

12. Review of the Anti-Corruption Policy and Measures

The Company shall review this Anti-Corruption Policy and measures at least once a year or whenever there are changes in legal requirements, regulations/rules, announcements, or related orders of government authorities, the Stock Exchange of Thailand (SET), and the Securities and Exchange Commission (SEC).

The revised policy and measures shall be proposed to the Audit Committee for consideration and endorsement and subsequently submitted to the Board of Directors for approval.

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Note: *The review was considered and approved by the resolution of the Board of Directors Meeting No. 8/2026 held on 13 November 2023.*

(Mr. Maroj Vananan)

Chairman of the Board

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