Enterprise Risk Management Manual

Primo Service Solutions Public Company Limited

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Table of Contents

This guideline has been prepared as a tool to communicate and promote understanding of the Enterprise Risk Management process among the Company's directors, management, employees, and relevant parties, including its subsidiaries. It aims to ensure that risk management is carried out in accordance with the policies set by the Board of Directors. The risk management process is integrated into internal management processes to drive risk management as an integral part of overall operations.

Definitions

Risks means the possibility of uncertain events or factors that may cause current plans or operations to fail to achieve the defined objectives or targets, resulting in impacts or damage to the organization, whether financial or reputational.

Risk Management means the process undertaken by the Board of Directors, management, and all personnel within the organization to support strategic planning and operations. The process is designed to identify potential events that may affect the organization and to manage risks within an acceptable level, to provide reasonable assurance that the organization's objectives can be achieved.

Risk Appetite means the maximum level of risk acceptable at the organizational level, as approved by the Board of Directors, for use in risk assessment and management. Any risk that has been analyzed and assessed and is found to potentially impact the Company or its subsidiaries beyond the acceptable level shall require the responsible unit to prepare a risk management action plan and report to the Risk Management Committee for consideration and submission to the Board of Directors.

Objectives of Risk Management

1. To enable the identification of risks or unexpected crises and to respond appropriately and in a timely manner to minimize losses or damage to the organization. Measures and guidelines shall be established to manage residual risks within the organization's acceptable

level, with consideration given to measures that effectively reduce the likelihood and/or impact of potential risks, to support the achievement of the organization's objectives.

2. To ensure that the Risk Management Committee, the Audit Committee, and the Board of Directors are informed of and able to effectively oversee the Company's key risks, with risk management carried out in a continuous and systematic manner.
3. To ensure effective communication and promote understanding of risk management, as well as to foster awareness of risk ownership, encourage shared responsibility for risk management within assigned duties, and develop it into an organizational culture.

Risk Management Policy

The Company and its subsidiaries recognize the importance and necessity of adopting an internationally accepted risk management system in their management practices. The Company and its subsidiaries aim to emphasize risk management to minimize potential impacts on business operations, maintain a positive corporate image, and align operations across the organization. Accordingly, the following risk management policies are established:

1. Risk management shall be the responsibility of employees at all levels, who must be aware of the risks associated with their duties and the organization. Emphasis shall be placed on maintaining adequate and appropriate levels of risk management and internal control in all areas.
2. An enterprise risk management process shall be implemented in accordance with recognized international best practices to ensure effective management of risks that may impact the operations of the Company and its subsidiaries. Risk management shall be consistently applied across the organization and integrated into strategic planning, business planning, and operational decision-making, with a focus on achieving the defined objectives, goals, vision, mission, and strategies, as well as promoting operational excellence and stakeholder confidence.
3. Measures shall be established to prevent and mitigate risks arising from the operations of the Company and its subsidiaries to avoid potential losses or damages, including regular monitoring and evaluation of risk management performance.

4. The adoption and development of modern information technology systems shall be promoted in the risk management processes of the Company and its subsidiaries. Personnel at all levels shall be supported in accessing risk management information, and risk management reporting systems shall be developed to ensure efficiency.

Framework

- The Company's risk management is overseen by the Board of Directors through the Risk Management Committee, which ensures that risk management is conducted in a systematic and continuous manner, and provides policy-level support to enable effective risk management and promote risk awareness in all business activities of the Company, covering operations in line with sustainable development across economic, social, and environmental dimensions.
- The Risk Management Committee comprises members of the Board of Directors who are independent directors, the President/Executive Director, and senior management. To achieve maximum effectiveness in risk management, the Company integrates risk management into its business plans, with an emphasis on value creation for the Company and its stakeholders. Risks are analyzed comprehensively, covering both positive and negative aspects. The Company's risk management process begins with defining objectives in line with business plans and cascading them down to the business unit, division, department, and unit levels, including risk identification and the assignment of risk owners, who are directly responsible for managing such risks.
- The Risk Management Committee continuously monitors risk management performance through regular meetings with management and reports to the Board of Directors at least on a quarterly basis, and when there are significant changes that may impact the Company's business operations. It also supports communication and promotes understanding of risk management among employees at all levels to ensure effective implementation throughout the organization.

Roles, Duties, and Responsibilities in Risk Management

1. **Board of Directors**

Responsible for establishing the Company's policies and strategic direction, and for overseeing that the Company has effective and efficient risk management systems in place, ensuring that management places importance on risk management and embeds it as part of the organizational culture.

2. **Audit Committee**

Responsible for reviewing the financial and accounting reporting systems, internal control systems, corporate governance, internal audit systems, and risk management systems, including anti-fraud and anti-corruption policies and measures, to ensure that they are appropriate, sufficient, and in compliance with international standards, applicable requirements, and laws, and for reporting to the Board of Directors.

3. **Risk Management Committee**

Responsible for overseeing and establishing guidelines for risk management, considering and approving risk management approaches to ensure systematic and continuous implementation, covering risks arising from current business operations, investments in new businesses, and sustainability risks (ESG Risks) across economic, social, environmental, and governance aspects. Responsible for approving the risk management framework for use as the Company's guideline, monitoring risk management performance, supporting communication and promoting understanding of risk management among employees at all levels to ensure effective implementation throughout the organization, as well as providing opinions, recommendations, and advice to management, and reporting to the Board of Directors.

4. **Corporate Governance and Sustainability Committee**

Responsible for overseeing corporate governance and sustainability operations, establishing policies on corporate governance and sustainability, business ethics, and policies related to the duties of directors, management, and employees to ensure compliance with applicable laws, regulations, and requirements of government authorities and regulatory bodies, such as the Stock Exchange of Thailand and the Securities and Exchange Commission, in accordance with principles of good corporate governance. Responsible for developing the

Company's corporate governance system and providing recommendations to the Board of Directors and management to ensure compliance with corporate governance and sustainability policies. The Corporate Governance and Sustainability Committee reports to the Board of Directors.

5. **Sustainability Committee**

Comprising C-level executives of the Company and its subsidiaries, responsible for driving sustainability policies, strategies, and operations across the organization in alignment with the direction set by the Board of Directors and/or the Corporate Governance and Sustainability Committee. Ensures that sustainability initiatives are implemented systematically and integrated into business activities, establishes appropriate action plans aligned with strategic plans, and allocates budgets for sustainability operations of the group in accordance with the Company's direction. Responsible for monitoring sustainability performance and promoting understanding and awareness of ethics, environmental protection, and social responsibility in line with sustainability principles, and reporting to the Corporate Governance and Sustainability Committee.

6. **Management, Chief Executive Officer, and Executives**

Responsible for ensuring that a risk management system is established in accordance with the policies and guidelines set by the Board of Directors; formulating strategies and ensuring the development and monitoring of enterprise-wide risk management plans covering key risks, including business and sustainability risks (ESG Risks); assigning to a Risk Owner; determining the risk appetite for submission to the Board of Directors for approval; promoting communication and fostering a risk-aware organizational culture; and reviewing the appropriateness of systems and measures, including anti-fraud and anti-corruption measures, to ensure alignment with changes in business operations, regulations, and applicable laws.

7. **Sustainability Working Committee**

A working group appointed by each business unit, comprising heads of relevant functions responsible for ESG operations, to support sustainability implementation within their respective units in accordance with established plans. Responsible for preparing and proposing action plans and guidelines by aligning unit-level plans with the Company's sustainability policies, strategies, and plans; communicating and promoting understanding of ESG practices; monitoring implementation within responsible units; coordinating and consolidating ESG activities with relevant parties; and reporting to the Chief Executive Officer of each business unit and the Sustainability Committee.

8. **Risk Management Working Committee**

Responsible for developing an effective and efficient risk management system; providing advice, consultation, and training to enhance understanding of risk management; monitoring and communicating future trends and emerging risks, including ESG risks, that may impact business operations in the short, medium, and long term; coordinating and monitoring risk management performance from Risk Owners and the Sustainability Working Committee; preparing risk reports for submission to management and the Risk Management Committee, Audit Committee, Sustainability Committee, and/or the Board of Directors as assigned; and supporting the effective operation of the Risk Management Committee.

9. **Risk Owners**

Responsible for assessing and analyzing risks; defining risk management measures and activities; analyzing the cost–benefit of each alternative; monitoring risk assessment results; and reporting to the Chief Executive Officer and the Risk Management Committee.

10. **Internal Audit**

Responsible for auditing and reviewing operational processes to ensure compliance with the Company's policies, procedures, best practices, and applicable laws and regulations, to ensure that the Company has adequate and appropriate internal control and risk management systems, and reporting to the Audit Committee for submission to the Board of Directors.

Risk Categories

- Business Risks
- ESG Risks) : risks related to Environmental, Social, and Governance aspects

Business risks can be categorized as follows:

1. **Strategic Risk**

Risk arising from inappropriate formulation or implementation of strategies and business plans, or the inability to execute them effectively, including a lack of critical resources required to achieve strategic objectives.

2. **Operational Risk**

Risk arising from operational processes that affect the efficiency and effectiveness of business operations, resulting in the inability to achieve defined targets.

3. **Financial Risk**

Risk related to financial matters, such as interest rate volatility, exchange rate fluctuations, and counterparty risk.

4. **Compliance Risk**

Risk arising from the inability to comply with applicable laws, regulations, or requirements, or where such regulations are inappropriate or hinder operations, which may lead to impacts such as penalties, legal actions, or reputational damage. This also includes risks arising from changes in government policies.

- **Financial regulations**: Changes in banking laws, securities regulations, or tax laws may affect how the Company manages its finances, reports revenue, and conducts transactions.
- **Environmental regulations:** New or more stringent environmental laws may require the Company to invest in cleaner technologies or modify operational processes to reduce pollution and waste, impacting the Company's costs and operations.
- **Health and safety regulations:** Updates to safety standards may require the implementation of new compliance measures, which may lead to increased operating costs, such as in construction and healthcare.
- **Data protection and privacy laws:** Due to increasing concerns over data security, the Company must comply with regulations such as the General Data Protection Regulation (GDPR), the Personal Data Protection Act, and similar laws governing the handling and protection of consumer data.
- **Employment laws:** Changes in labor laws, including minimum wage, working hours, and employee benefits, may impact personnel costs and operations.

5. **Technology & Social Media Risks**

It is a risk related to changes in information technology, including digital transformation, which may impact the Company's operations. This also includes risks arising from information technology systems used in critical business activities that do not meet business requirements.

Technology Risks can be categorized as follows:

5.1) Risks related to changes in information technology and digital transformation, which may impact the Company's operations, including information technology systems used in critical business activities that do not meet business requirements.

5.2) Social Media Risks: Risks arising from the use of internet-based platforms that connect users, where users can create, publish, and share content or information rapidly through word-of-mouth communication and generate wide-reaching interactions. If such content reflects personal opinions, bias, lack of proper screening, or is negative toward the Company, it may cause damage to the Company's reputation, image, and customer confidence, thereby affecting its business operations.

6. **Fraud and Corruption Risk**

Risk arising from any act undertaken to obtain unlawful benefits, including the giving or receiving of bribes, whether in the form of money, assets, financial assistance, charitable donations, hospitality, or other expenses, by offering, promising, committing, requesting, giving, or accepting any improper benefit to or from government officials, public agencies, private entities, or persons with duties, whether directly or indirectly, in order to induce such parties to perform or omit their duties improperly.

<u>ESG Risks</u> : Risks associated with the environment, society, and governance.

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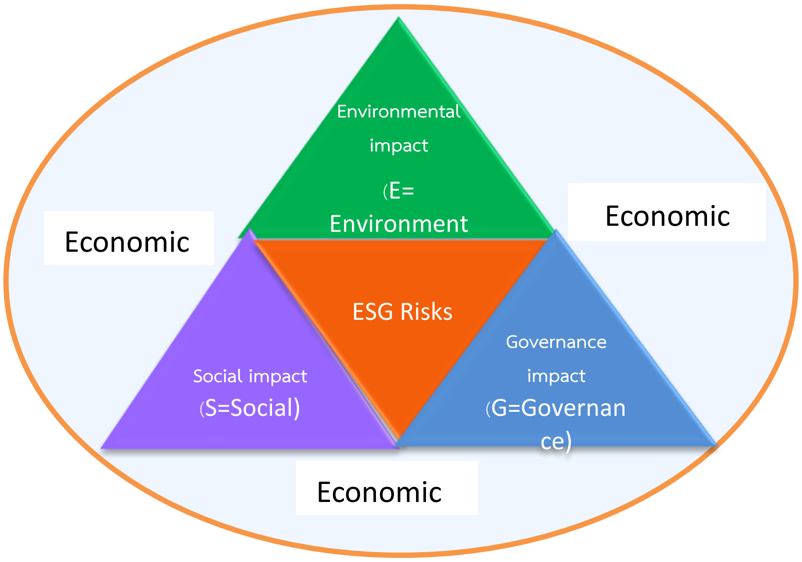

	ESG Key Issues
Environment	- Climate change resulting from carbon dioxide emissions, greenhouse gas emissions, and global warming - Efficient use of natural resources and biodiversity - Waste management (including emissions of hazardous substances, waste, packaging materials, and solid waste) - Energy efficiency - Clean technology / green buildings
Society	- Responsibility for product quality, safety, and service - Human rights, labor management, labor standards in the supply chain, and child labor - Occupational health and safety - Integration with the well-being of local communities - Stakeholder complaints and grievance handling
Governance	- Corporate governance and conduct - Business ethics - Anti-competition practices

	ESG Key Issues
	- Tax transparency

Enterprise Risk Management Process

To ensure a systematic risk management process, the Company adopts internationally recognized frameworks, including COSO-ERM (The Committee of Sponsoring Organizations of the Treadway Commission – Enterprise Risk Management), as well as the guidelines of the Stock Exchange of Thailand, as the basis for developing its risk management process. The process comprises five components as follows:

1) Governance and culture for ESG-related risks
2) Strategy and objective-setting related to ESG
3) Performance for ESG-related risks: through the enterprise risk management process (risk identification, assessment, prioritization, and response), with a focus on performance
4) Review and improvement for ESG-related risks
5) Information, communication, and reporting of ESG-related risks

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- Risk Management Process: 6 Steps
  1) Define objectives
  2) Establish risk assessment criteria and risk appetite
  3) Risk identification and preparation of the risk register
  4) Risk assessment
  5) Define risk management measures
  6) Monitor and report risk management results

1. Objectives Establishment

   This involves defining objectives at the corporate/business unit level in alignment with the organization's vision, mission, policies, and key goals. The risk management plan must be aligned with and support the established objectives.

2. Establish Risk Assessment Criteria and Risk Appetite

   This involves defining criteria for assessing risks in terms of likelihood and impact in order to prioritize risks, using a Risk Map. It also includes defining the acceptable level of risk and Key Risk Indicators / Trigger Points (KRIs).

Risk Map – Risk Assessment

Impact						
Impact	Very High (5)	5 (C)	10 (B)	15 (B)	20 (A)	25 (A)
	High (4)	4 (C)	8 (C)	12 (B)	16 (A)	20 (A)
	Moderate (3)	3 (D)	6 (C)	9 (C)	12 (B)	15 (B)
	Low (2)	2 (D)	4 (C)	6 (C)	8 (C)	10 (B)
	Very low (1)	1 (D)	2 (D)	3 (D)	4 (C)	5 (5)
		Very low (1)	Low (2)	Moderate (3)	High (4)	Very High (5)
	Likelihood					

Score Level	Risk Significance (Severity)	Symbol
16-20	Very high severity/significance: requires immediate management action	A
10-15	High severity/significance: requires urgent management action	B
4-9	Moderate severity/significance: requires regular monitoring	C
Below 4	Low severity/significance: acceptable level of risk for the Company	D
Risk Prioritization (Severity Level) and Risk Treatment Guidelines		

3. Risk Identification

This involves identifying and determining the causes or risk factors by considering both internal and external factors, as well as megatrends and global developments, such as changes in the natural environment, demographic shifts, globalization, and rapid technological advancement. Consideration is given across economic, social, environmental, and governance dimensions that may impact the organization's objectives. The identified risks are then recorded in the risk register.

4. Risk Assessment

Risk assessment is a step that follows risk identification and consists of two main processes as follows:

4.1 Risk Analysis and Assessment

This involves analyzing and assessing the risks identified in the Risk Identification step by considering the likelihood and impact, both positive and negative, of each risk in accordance with the criteria established by the Company. A single event or situation may affect multiple objectives and targets. In addition, the analysis should take into account existing risk management measures and their effectiveness.

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Risk Assessment Criteria

Risk assessment is based on the consideration of likelihood and impact:

- **Likelihood** refers to the probability that a risk event will occur within a given period, or the frequency of such occurrence.
- **Impact** refers to the severity of the consequences arising from a risk, which may affect the organization both positively and negatively, and can be categorized into financial and non-financial impacts.

To ensure clarity in practice, the Company has established criteria for assessing likelihood and impact, each divided into five levels.

Likelihood Assessment Criteria

1) General criteria – Consideration based on the likelihood of a risk event occurring

No.	Likelihood				
	1	2	3	4	5
1	Rare	Unlikely	Possible	Likely	Almost certain

2) Specific Likelihood Assessment Criteria

No.	Indicator	Impact				
		1	2	3	4	5
1	**Financial Loss**	Impact on assets not exceeding THB 100,000	Impact on assets from THB 100,001 to THB 200,000	Impact on assets from THB 200,001 to THB 500,000	Impact on assets from THB 500,001 to THB 1,000,000	Impact on assets exceeding THB 1,000,000
2	**Impact on operational objectives**	Impact on organizational objectives of less than 1%	Impact on organizational objectives from 1%–3%	Impact on organizational objectives from 3%–5%	Impact on organizational objectives from 5%–10%	Impact on organizational objectives exceeding 10%

No.	Indicator	Impact				
		1	2	3	4	5
3	**Impact on occupational safety**	Minor injury requiring only first aid or minor illness with no impact on work performance	Injury or illness requiring less than 3 days of leave	Injury or illness requiring less than 1 month of leave	Serious injury or illness requiring more than 1 month of leave	Severe injury or illness resulting in permanent disability or death
4	**Impact on reputation and image**	Very low likelihood of negative publicity affecting reputation and image, and can be controlled	**Reputation:** Rumors may arise referring to individuals within the Company or the Company itself **Customers/ Shareholders:** Initial concerns and inquiries begin **Legal:** Warning issued or minor fines with no material impact	**Reputation:** Social media disseminates news or information regarding a corruption case involving the Company **Customers/ Shareholders:** Questions raised to the Board of Directors **Legal:** The Company may be required to	**Reputation:** Ongoing media coverage and increasing public attention **Customers /Shareholders:** The Board of Directors and management must clarify and explain the facts **Legal:** Subject to investigation and determination	**Reputation:** The Company is blacklisted / negative corporate governance image **Customers /Shareholders:** Legal claims filed for damages **Legal:** Contract termination or revocation of business licenses / imprisonment of directors and

No.	Indicator	Impact				
		1	2	3	4	5
				submit evidence and provide clarification if the case is accepted by authorities	of wrongdoing by authorities	senior executives
5	**Impact on compliance with laws and regulations / inability to comply with regulations and internal company requirements, which may result in legal actions or litigation**	Full compliance with internal and external regulations and requirements	Non-compliance with internal company requirements, which can be promptly rectified	Non-compliance with internal company requirements, requiring time to rectify, with no material impact on the Company's operations	Non-compliance with internal company requirements, which may impact the Company's operations or stakeholders, or result in complaints, warnings, or fines	Non-compliance with internal company requirements, which may result in legal actions or litigation

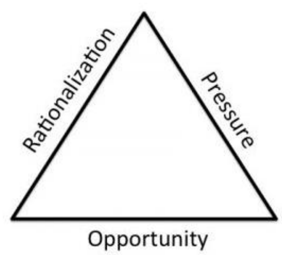
1.1 Fraud and Corruption Risk Assessment

In assessing the likelihood of fraud and corruption risks, the following risk factors shall be considered:

1) Pressure or Incentive
2) Opportunity arising from weaknesses or gaps in internal controls

3) Rationalization

The Fraud Triangle



(Refer to examples of fraud and corruption risk scenarios in the Appendix)

Likelihood – Fraud and Corruption Risk

No.	Likelihood				
	1	2	3	4	5
1	Never occurs (0%) when performing such transactions	Very rarely occurs (<20%) when performing such transactions	Occasionally occurs (20%–50%) when performing such transactions	Frequently occurs (>50%) when performing such transactions	Occurs every time (100%) when performing such transactions

1. <u>Impact Assessment – Enterprise-Level Risk</u>

In assessing risk impact, both financial impacts and non-financial impacts shall be considered. This serves as a guideline for risk assessment in general operations (where specific risk assessment criteria have not been established for particular cases), as follows:

No.	Indicator	Impact				
		1	2	3	4	5
1	**Financial Loss**	Impact on assets not exceeding THB 100,000	Impact on assets from THB 100,001 to THB 200,000	Impact on assets from THB 200,001 to THB 500,000	Impact on assets from THB 500,001 to THB 1,000,000	Impact on assets exceeding THB 1,000,000

No.	Indicator	Impact				
		1	2	3	4	5
2	Impact on operational objectives	Impact on organizational objectives of less than 1%	Impact on organizational objectives from 1%–3%	Impact on organizational objectives from 3%–5%	Impact on organizational objectives from 5%–10%	Impact on organizational objectives exceeding 10%
3	Impact on occupational safety	Minor injury requiring only first aid or minor illness with no impact on work performance	Injury or illness requiring less than 3 days of leave	Injury or illness requiring less than 1 month of leave	Serious injury or illness requiring more than 1 month of leave	Severe injury or illness resulting in permanent disability or death
4	Impact on reputation and image	Very low likelihood of negative publicity affecting reputation and image, and can be controlled	**Reputation:** Rumors may arise referring to individuals within the Company or the Company itself **Customers/ Shareholders:** Initial concerns and inquiries begin	**Reputation:** Social media disseminates news or information regarding a corruption case involving the Company **Customers/ Shareholders:** Questions raised to the Board of Directors	**Reputation:** Ongoing media coverage and increasing public attention **Customers /Shareholders:** The Board of Directors and management must clarify and explain the facts	**Reputation:** The Company is blacklisted / negative corporate governance image **Customers /Shareholders:** Legal claims filed for damages

No.	Indicator	Impact				
		1	2	3	4	5
5	**Impact on compliance with government regulations/laws**	Full compliance with internal and external regulations and requirements	Warning issued or minor fines with no material value	The Company may be required to submit evidence and provide clarification if the case is accepted by authorities	Subject to investigation and determination of wrongdoing by government authorities	Contract termination or revocation of business licenses / directors and senior executives may face criminal prosecution
6	**Impact on environment**	Minor impact, naturally recoverable without affecting surrounding communities	Minor impact on surrounding communities. The Company can resolve and control the situation within 24 hours using its own personnel	Impact on communities; the Company can resolve and control the situation within 24 hours with assistance from external parties, without affecting business operations, or results in	Impact on communities; the Company is unable to resolve or control within 24 hours, or remediation takes less than 1 year and/or requires treatment/recycling technology, or affects business operations, or causes project delays of up to 3 months, or results in warnings or fines	Widespread environmental impact, or remediation takes more than 1 year and/or cannot be remediated and/or no appropriate technology is available, or affects business operations causing project delays of more than 3 months,

No.	Indicator	Impact				
		1	2	3	4	5
				written complaints	from government authorities	or may result in project suspension or criminal penalties

<u>Note</u>: In assessing likelihood and impact, all relevant dimensions of each risk shall be considered. Where a risk factor has impacts across more than one dimension, the highest assessed likelihood and impact shall be used to determine the overall risk level.

4.2 Risk Prioritization (Severity)

To ensure effective risk management and appropriate allocation of the Company's resources in line with the significance of risks, a Risk Map is utilized as follows:

Figure 1: Risk Map illustrating the relationship between the likelihood of occurrence and the impact of each risk

	Risk Map – Risk Assessment					
Impact	Very High (5)	5 (C)	10 (B)	15 (B)	20 (A)	25 (A)
	High (4)	4 (C)	8 (C)	12 (B)	16 (A)	20 (A)
	Moderate (3)	3 (D)	6 (C)	9 (C)	12 (B)	15 (B)
	Low (2)	2 (D)	4 (C)	6 (C)	8 (C)	10 (B)
	Very low (1)	1 (D)	2 (D)	3 (D)	4 (C)	5 (5)
		Very low (1)	Low (2)	Moderate (3)	High (4)	Very High (5)
	Likelihood					

Risk prioritization (severity level) is determined based on the scoring levels in the Risk Map matrix and is categorized as follows:

Score Level	Risk Significance (Severity)	Symbol
16 - 20	High	A
10 - 15	Moderately High	B
4 - 9	Moderate	C
Below 3	Low	D

5. Risk Treatment

To ensure that risk management is carried out continuously and effectively, the Company has defined responsibilities for risk management and established risk treatment approaches as follows:

5.1 Risk Owner Responsibilities and Actions Based on Risk Significance Levels

Level	Significance	Action	Risk Owner Level
A	Very high severity	A risk reduction plan must be established, with adequate allocation of resources and measures to immediately reduce the risk within a defined timeframe, or the risk may need to be transferred.	CEO/President
B	High severity	A risk reduction plan must be established, with sufficient allocation of resources and measures to reduce the risk to an acceptable level.	MD/CFO
C	Moderate severity	Risk must be controlled through appropriate and sufficient control measures, such as process improvements or the establishment of control standards.	VP/AVP
D	Low severity	Risk status must be monitored regularly as part of normal operational procedures.	Manager

The risk management plan shall be presented to the management meeting for consideration and approval, including the allocation of necessary resources (if any). In selecting the most appropriate risk treatment approach, consideration shall be given to the costs incurred in comparison with the expected benefits, as well as applicable laws, regulations, and social responsibilities.

5.2 Risk Treatment Approaches (4T)

- Terminate: Discontinuing or ceasing activities that give rise to risk. This is applied when the risk is highly severe and cannot be reduced or managed to an acceptable level.
- Transfer: Transferring all or part of the risk to external parties to share or bear the risk, such as through purchasing insurance policies.
- Treat: Implementing measures to reduce the likelihood of occurrence or the potential impact of risks, such as preparing contingency plans.
- Take: Accepting the existing risk without taking further action, typically applied when the cost of mitigation measures outweighs the expected benefits.

6. Monitoring and Reporting of Risk Management Results

6.1 The Risk Management Working Committee shall coordinate with the responsible management units to report risk assessment results and risk management performance to the management meeting, the Risk Management Working Committee, the Risk Management Committee, and the Board of Directors for further consideration.

For enterprise-level risks classified as high and moderately high significance (Level A and Level B), the responsible management unit (Risk Owner) shall report the risk status and action plans to reduce the risk to an acceptable level to the Risk Management Committee for consideration and submission to the Board of Directors for approval, until the severity level of the risk is reduced to an acceptable level.

6.2 Management shall analyze and monitor changes in both internal and external environments in order to assess risks that may materially impact the defined objectives. Such changes may require a review of risk management measures and risk prioritization, and may also be used in reviewing the overall risk management framework at least once a year, with submission to the Risk Management Committee and thereafter to the Board of Directors for approval.

This revision was approved by the resolution of the Board of Directors Meeting No. 4/2568 held on 13 November 2568.

(Mr. Khajit Chatchavanich)	(Mr. Marote Vananan)
Chairman of the Risk Management Committee	Chairman of the Board
Primo Service Solution Public Company Limited	Primo Service Solution Public Company Limited

Appendix

Examples of Fraud and Corruption Risk Scenarios

- Government officials requesting benefits, particularly in relation to approvals for building construction, condominiums, or housing projects
- Conflict of interest involving drafting architectural plans and conducting the approval review themselves (although standard templates may be provided by government authorities for public convenience, applications still require supporting layouts, resulting in the need to hire reviewers or approvers to facilitate approval)
- Government officials colluding with or being involved with individuals or juristic persons in unlawful construction, modification, demolition, or relocation of buildings
- Government officials colluding with or being involved with individuals or juristic persons in the use of buildings inconsistent with permits or notifications submitted to local authorities
- Tax assessments lower than the actual value
- Bribery through intermediaries or payment of monthly facilitation/protection fees
- Employees, officers, or outsourced personnel acting as agents in submitting registration or permit applications while demanding benefits or additional fees in exchange for special treatment
- Permit application processes lacking clear timelines, creating opportunities for bribery in exchange for expedited approval consideration
- Non-standard discretion in reviewing the completeness of documents
- Acceptance of applications despite incomplete documentation as specified in the requirements

- Deliberately withholding applications from operators in order to demand benefits
- Review and approval processes not conducted in the order applications are received
- Under normal procedures, reviews may take one working day; however, in some cases additional time may be required, such as arranging site inspections with applicants before issuing permits. This may create opportunities for officials to exploit the process for improper gain or demand benefits during the review stage
- Queue-jumping in processing applications or petitions
- Site inspections for business operation permits conducted in a manner that improperly favors applicants whose premises do not meet required criteria
- Bribery of officials to obtain favorable treatment in cases where business premises do not comply with requirements
- Inspections or visits to business premises, such as construction projects, conducted with the intention of soliciting monthly payments
- Alteration of allegations or charges from more serious to less serious offenses, or vice versa
- Concealment of facts in criminal investigation files
- Filing anonymous complaints against operators to justify inspections or searches in cases where operators refuse to make monthly payments
- Use of intermediaries to collect special payments or monthly fees from operators
- Abuse of discretion in approvals or exemptions from regulations that create conflicts of interest or provide improper benefits
- Issuance of regulations, laws, or directives that create improper benefits or conflicts of interest
- Granting educational or research funding based on favoritism, patronage, or personal connections