

Anti-corruption Policy

Alpha Capital Partners Group Company Limited

Alpha Capital Partners Group Company Limited (the '**Company**') and its subsidiaries conduct its business with integrity by adhering to the principles of corporate social responsibility and respect for all stakeholders based on good corporate governance and its Code of Conduct, including relevant policies. The Company is committed to combatting all types of corruption. To ensure that the Company and its subsidiaries have in place a policy which sets out appropriate accountability, practices and guidelines for actions to be taken to prevent corruption in all business activities of the Company and to ensure that all business decisions and operations which are exposed to corruption risks are treated and implemented with prudence, the Company has prepared this 'Anti-corruption Policy' as written guidelines on clear business practices and corporate development towards sustainability.

Definition of Corruption under the Anti-corruption Policy

Corruption is defined as all types of bribery given either directly or indirectly by way of offering, agreeing to, giving, promising to give, demanding or accepting money, assets, or such other benefits which are inappropriate to or from government officers, government agencies, private sectors, or any person in a position of responsibility, so that such person takes any action or omits to carry out any duties with the aim of acquiring, retaining, or introducing business to any particular company or to achieve or retain any commercially improper benefits. Exceptions shall be applied in cases that are not prohibited under laws, regulations, notifications, or rules.

Anti-corruption Policy

The Company's directors, executives and employees are prohibited from engaging in or accepting any forms of corruption, both directly and indirectly. Such prohibitions shall extend to business transactions in all countries and all relevant agencies. The Company shall ensure that the policy is in line with any changes to business, rules, regulations, and requirements of the law.

Duties and responsibilities

1. The Company's Board of Directors has the duty to devise policies and put in place an efficient anti-corruption system to ensure that the management is aware of and recognize the importance of anti-corruption so that anti-corruption is enshrined in the corporate culture of the Company and its subsidiaries.
2. The Audit Committee is charged with the duty and responsibility to carry out an audit of the financial reporting system, accounting system and internal control and internal audit, including risk management system, to ensure that they meet industry standards, are strict, appropriate,

up-to-date, and efficient. The Audit Committee is also in charge of handling submission of information regarding corruption involving the Company and its subsidiaries' personnel, conducting fact-finding investigations, presenting the matter to the Board of Directors to determine disciplinary action or solutions, as well as giving consultation and ensuring compliance with this Anti-corruption Policy

3. The Chief Executive Officer and executives shall have the duty and responsibility to put in place and promote an anti-corruption system and communicate the same to all employees and all relevant parties and shall review the suitability of systems and measures to ensure that they are in line with any changes to business, rules, regulations, and requirements of the law.
4. The Company shall ensure that its subsidiaries shall comply with this Anti-corruption Policy as well.

Guidelines

1. The directors, executives, and all levels of employees of the Company and its subsidiaries shall comply with the Anti-corruption Policy and Code of Conduct by refraining from both direct and indirect involvement in any corruption.
2. The Company's employees shall not neglect or ignore any incident of possible corruption relating to the Company that they have witnessed. Any incident of corruption shall be reported to relevant supervisors of the employee who witnesses the corruption or to any responsible person. The employees shall collaborate with the validation of facts. The employees shall address through available channels any questions that they may have to the supervisors or designated persons who are responsible for monitoring compliance with the Code of Conduct.
3. The Company will ensure that the employees who refrain from or report matters of corruption relating to the Company, or persons who cooperate in reporting corruption will be treated with fairness and are protected with adequate protection measures.
4. Any persons who are involved in corruption shall be deemed to be in breach of this Policy and the Code of Conduct of the Company and shall be liable for disciplinary action in accordance with the work rules of the Company and may also be liable for penalties under the relevant law if such act of corruption is in violation of the law.
5. The Company recognizes the importance of sharing information with, educating, and training persons whose duties relate to the Company or who may have any impact on the Company regarding the compliance with this Anti-corruption Policy.
6. The Company strives to create and maintain a corporate culture of zero-tolerance for corruption in dealings with both government and private sectors.

Requirements

1. This Anti-corruption Policy shall extend to human resources management, including the recruitment or selection of personnel, promotions, trainings, evaluation of performance of employees and remunerations. All levels of supervisors are required to communicate with and ensure understanding of employees with respect to business activities that are their responsibility and to monitor and ensure that the compliance therewith is effective.
2. All actions taken in accordance with this Anti-corruption Policy shall be in line with the guidelines determined by the Company, including policies and practices for treatment of all stakeholders, including rules, regulations and work manuals of the Company and such other guidelines to be provided by the Company.
3. For clarity regarding matters which are at high risk of corruption, the directors of the Company, executives, and all levels of employees of the Company shall exercise particular precautions in the following matters:

3.1 Gifts, hospitality, and expenses

Giving or accepting gifts or hospitality shall be in accordance with the guidelines provided by the Company.

3.2 Donations or financial support

Giving or accepting donations or financial support shall be transparent and lawful and it shall be ensured that donations and financial support are not used as an excuse for bribery.

3.3 Business relationships and procurement with the government sector

It is prohibited to give or accept bribery in all types of business transactions of the Company. Contact with the government sector shall be made with transparency, integrity and shall be in accordance with relevant laws.

- 3.4 The Company strives to be a politically neutral without acting in favor of or supporting any political parties, political coalition, or any similar activities, both monetary, non-monetary, and any other forms of benefits.

However, the Company has given the employees or staff the right and freedom to express their political opinions. Nonetheless, they must not use their position as the Company's employees or staff, nor any assets indicating the Company for political activities participation that may cause the Company to lose their political neutrality.

Training and Communication

The Company shall provide communication and training that genuinely educate employees and staff on the Anti- Corruption measures, expectations, and punishment for violation. The Company shall also communicate the Anti-corruption Policy and practice to subsidiaries.

Reporting

Reporting and providing sources of information about corruption is the duty of all levels of personnel within the Company. Reporting may be made anonymously using the following channels:

1) By Post

Contact Person: Company Secretary

Address: 12th Floor, Capital Tower, All Seasons Place, 87/1 Wireless Road, Lumpini,
Pathumwan, Bangkok 10330, Thailand

2) By Email

Contact Person: Company Secretary

Email Address: companysecretary@acpg.co.th

3) By Telephone

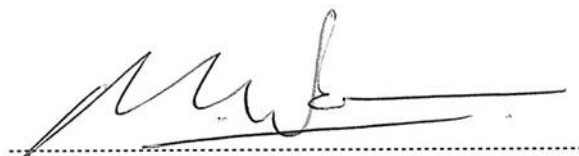
Contact: +66 2781 6020

All directors, executives and employees of the Company have the duty to cooperate with any investigations into corruption.

Penalty

The Company shall establish appropriate disciplinary punishment system on non-compliance and direct or indirect violating employees or staff against this Anti-corruption Policy. Any non-compliance hereunder may lead to separate legal offence and liability in connect with the provision of relevant laws.

The Board of Directors considered and approved this Anti-corruption Policy in the Board of Directors meeting No. 7/2022, which was held on 4 November 2022. The Anti-corruption Policy shall come into force as from 4 November 2022.



(Mr. Christopher Michael Nacson)

Chairman of the Board of Directors

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