

**MCOT Public Company Limited**

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**Notification of MCOT Public Company Limited**

**No. 16 / 2025**

**Subject: Anti-Corruption Policy**

MCOT Public Company Limited (MCOT) operates its business with a commitment to virtue, ethics, and transparency toward all stakeholders, and anti-corruption in all forms, including bribery and malfeasance in office. MCOT recognizes that corruption causes severe damage to free and fair competition, as well as social and economic development. Therefore, in order to ensure compliance with national anti-corruption laws and international anti-corruption guidelines, MCOT hereby issues the "Anti-Corruption Policy" to serve as a framework and code of conduct for directors, executives, and employees at all levels. This policy aims to foster a corporate culture of integrity, transparency, and high ethical standards, steering the organization toward sustainable growth.

The Board of Directors of MCOT, at Meeting No. 13/2025 on August 26, 2025, resolved to adopt this Anti-Corruption Policy as follows:

Clause 1: This Notification shall be called the "Notification of MCOT Public Company Limited No. 16/2025 Subject: Anti-Corruption Policy."

Clause 2: This Notification shall come into force from July 9, 2025 onwards.

Clause 3: In this Notification:

"MCOT" means MCOT Public Company Limited.

"Policy" means the Anti-Corruption Policy.

"Corruption" means any form of bribery, whether by offering, promising, giving, accepting, or soliciting any undue advantage, financial or otherwise, to or from government officials, government agencies, private entities, or any responsible person, either directly or indirectly, in order to influence such person to act or refrain from acting in the performance of their duties, or to secure or retain any other improper business advantages, except where permitted by laws, regulations, traditions, or local customs.

"Malfeasance in Office" means performing or omitting to perform an act within one's duties, or pretending to hold such duties, or abusing one's official power to seek an improper and unlawful advantage for oneself or others, including any offenses under anti-corruption laws.

"Misconduct" means exercising the power of one's position or duties in a manner that violates laws, regulations, orders, or Cabinet resolutions intended to control, supervise, receive, retain, or utilize money or property of the government or state agencies.

"Bribery" means demanding, accepting, or agreeing to accept property or any other benefit for oneself, for another person, or for the benefit of MCOT, whether directly or indirectly, in order to perform or refrain from performing any act in one's position, regardless of whether such act is lawful or unlawful in accordance with one's duties.

"Facilitation Payment" means a small, unofficial payment made to a government official solely to ensure that the government official will carry out a process or to expedite the performance thereof.

"Personnel of MCOT " means the directors, executives, employees, and workers of MCOT.

"Persons Associated with the Business of MCOT " means agents or any person acting for or on behalf of MCOT, whether or not such person has the authority to do so.

Clause 4: MCOT establishes this Policy with the objective of demonstrating the principles of integrity, transparency, accountability, and responsibility of MCOT, and to raise awareness of the severe dangers of corruption, misconduct in office, maladministration, and bribery, which undermine the Company's financial performance, reputation, and the confidence of its stakeholders and society at large.

Clause 5: MCOT adopts a zero-tolerance policy towards all forms of corruption, whether committed by the Personnel of MCOT or by persons associated with the business of MCOT. Therefore, MCOT shall take measures to ensure that this Policy is effective and efficient in practice, as follows:

(1) Establish stringent measures to prevent corruption, misconduct in office, maladministration, and bribery from occurring in all types of transactions undertaken by MCOT, which shall encompass the actions of the Personnel of MCOT and its business partners. MCOT shall provide:

(a) Measures incorporating checks and balances.

(b) Comprehensive rules and regulations governing the acquisition of supplies through purchase, hire, lease, exchange, or other juridical acts as clearly prescribed by law.

(2) MCOT shall not engage in any transaction with any person, legal entity, or other agency that MCOT has investigated and found to have engaged in corrupt practices.

(3) This Anti-Corruption Policy shall extend to the human resource management process, including the recruitment or selection of Personnel of MCOT, promotion, training, performance evaluation, and compensation. Supervisors at all levels shall communicate and ensure understanding among employees and supervise compliance effectively.

**At MCOT, we all work together towards a common goal of promoting transparency and anti-corruption to achieve sustainable development.**

MCOT has adopted an anti-corruption policy against all forms of corruption, which applies to any action taken by MCOT employees. For more information, please visit <https://investor.mcot.net/th/corporate-governance/anti-corruption>

(4) MCOT shall establish procedures for verification, approval, and review, supported by clear documentation consistent with the Company's regulations, to ensure that donations and sponsorships are not used as a pretext for corruption, misconduct in office, maladministration, or bribery.

(5) The payment of facilitation payments to government officials, whether directly or indirectly, is strictly prohibited.

(6) MCOT shall maintain political neutrality in its political contributions. It shall not engage in any act of favoritism or provide financial or other support, whether directly or indirectly, to any political party, political coalition, political authority, or political candidate at the local, regional, or national level.

(7) MCOT adopts a policy on the hiring of government officials (Revolving Door) prohibiting the employment of government officials or former government officials who have left their positions within the preceding two years, in any capacity that would create a conflict of interest. The Company shall implement measures to disclose the hiring of government officials or former government officials to ensure transparency and accountability.

(8) The giving or receiving of bribes in business relationships, procurement, and contracting with both the public and private sectors is strictly prohibited. All business operations and all dealings with the public and private sectors shall be conducted transparently, honestly, and in compliance with all relevant laws.

(9) MCOT shall provide channels for its Personnel and persons associated with MCOT to seek confidential advice and guidance regarding compliance with this Policy. This shall include the establishment of a whistleblower channel for reporting violations or suspected violations of this Policy to MCOT. The Company shall establish an effective whistleblowing policy and procedure that maximizes the benefit to MCOT.

(10) MCOT adopts the principle that it shall not demote, penalize, or otherwise adversely affect any Personnel of MCOT who refuses to participate in corruption, misconduct in office, maladministration, or bribery, even if such refusal results in the loss of business opportunities for MCOT Public Company Limited. MCOT shall have clear communication processes regarding this principle.

(11) MCOT has a policy to promote and support its Personnel in adhering to ethical standards in their work and in cultivating a mindset against corruption, misconduct in office, maladministration, and bribery in the performance of their duties.

Clause 6: MCOT shall implement measures covering the following:

(1) Assessment of internal corruption risks within the organization, including rigorous and regular monitoring and review of the outcomes of such risk management.

(2) Rigorous assessment of the effectiveness and efficiency of internal controls.

(3) Retention of transaction records to ensure readiness for audit and inspection.

(4) Provision of continuous training to Personnel of MCOT at all levels, particularly employees involved in transactions with corruption risks and new employees.

(5) Communication to Personnel of MCOT, and covering subsidiaries, associates, and other companies over which MCOT has control, as well as business agents, contractors, business partners, and the public, to make them aware of this Anti-Corruption Policy through various communication channels of MCOT, such as its website, application, annual report, and annual registration statement, in order to foster understanding and support for anti-corruption efforts.

(6) Undertaking any other actions, in addition to those specified in (2) through (5), to prevent and suppress corruption, misconduct in office, maladministration, and bribery.

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Clause 7: MCOT shall arrange for effective external audits by the Office of the Auditor General of Thailand and/or other appropriate agencies in accordance with legal requirements.

Clause 8: The President or the Managing Director of MCOT and relevant management shall oversee and assign responsibility for compliance with this Policy. The Audit Committee shall monitor and review the systems and measures adopted by MCOT to combat corruption to ensure their adequacy.

Clause 9: Personnel of MCOT shall comply with the following obligations:

(1) Strictly adhere to the policies, regulations, rules, announcements, and orders of MCOT concerning discipline, ethical standards, and professional conduct, in accordance with the highest standards.

(2) Not participate in, promote, or support corruption, misconduct in office, maladministration, and bribery, including refraining from demanding, arranging, or accepting any act of corruption for personal gain or for the benefit of others.

(3) Exercise due diligence in performing their duties by strictly complying with internal control and risk management measures used for the prevention of corruption.

(4) Utilize the resources and assets of MCOT for the benefit of the Company's business and avoid any use of the Company's assets that is contrary to this Policy.

(5) Avoid any conflict of interest with MCOT. All actions shall be reasonable, based on the best interests of MCOT, and in compliance with relevant laws and regulations. If any action or circumstance constitutes a conflict of interest with MCOT, such Personnel are obligated to report such conflict through the channels designated by MCOT.

(6) Refrain from accepting or giving gifts, property, or any other benefits, including entertainment, that could be construed as facilitating corrupt practices, whether before, during, or after performing their duties. This shall be in accordance with the guidelines on the acceptance and giving of gifts, entertainment, or other benefits, and consistent with the regulations of MCOT.

(7) Prevent, supervise, investigate, and report or whistleblow any act or attempted act of corruption, misconduct in office, maladministration, and bribery, in accordance with the rules and procedures established by MCOT without delay.

(8) Uphold the seven principles of ethics as prescribed in the Code of Ethics for Executives and Employees of State Enterprises, dated September 29, 2021, namely: 1) Adherence to the core institutions of the nation (Nation, Religion, Monarchy); 2) Honesty, integrity, good conscience, and responsibility towards duties; 3) Courage to make decisions and act correctly and justly; 4) Prioritization of the public interest over personal interest and public-mindedness; 5) Commitment to achieving work results; 6) Performance of duties with fairness and without discrimination; and 7) Conduct as a good role model and maintenance of the official's positive image.

(9) Comply with the requirements regarding the ethics maintenance process, mechanisms, and enforcement of the Code of Ethics for Executives and Employees of State Enterprises, dated March 5, 2025, which consists of 3 sections and 10 topics.

(10) Strictly adhere to the guidelines set forth in Part 3 of the Manual of Practice under the Regulations of MCOT Public Company Limited on Ethical, Moral, and Professional Conduct Standards, B.E. 2567 (2024), which comprises 9 categories.

Personnel of MCOT who fail to comply with this Policy shall be subject to investigation in accordance with the Company's regulations and may be subject to penalties prescribed by law if found to have committed an offense.

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Clause 10: MCOT has established whistleblowing channels and procedures for investigation and disciplinary action regarding acts of corruption, misconduct in office, maladministration, and bribery by its Personnel. MCOT shall conduct investigations and impose disciplinary measures in strict accordance with the relevant regulations.

Clause 11: In cases where corruption, misconduct in office, maladministration, or bribery by any Personnel or any person constitutes a criminal offense under the law against MCOT, MCOT Public Company Limited shall file a complaint, lodge an accusation, or refer the matter to the competent authorities for legal proceedings.

In the above cases, if any Personnel of MCOT or any person causes damage to MCOT, whether financial damage or damage to the Company's reputation, the Company shall exercise its right to claim compensation for damages from such person.

Clause 12: MCOT shall cooperate with and support any person, legal entity, or organization whose objective is to combat corruption, in order to create a sustainable corruption-free society and environment.

Announced on July 9, 2025

(Mr.Chatchai Thnarudee)  
Director of MCOT Public Company Limited

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