

# CENTRALPATTANA

## Political Participation Policy

### Central Pattana Public Company Limited

#### 1. Introduction

Improper or non-transparent management of political participation can give rise to risk to legal, reputational stakeholder trust risks, all of which may undermine long-term organizational stability and sustainability. A lack of political neutrality may also lead to conflicts of interest, business uncertainty and harm relationships with suppliers, customers and government agencies. Central Pattana Public Company Limited and its subsidiaries (the “Company”) have consistently recognized the importance of **maintaining political neutrality, transparency and adherence to good governance principles**. The Company is committed to complying with international standards relating to business transparency, sound corporate governance and good governance principles, to ensure it does not support any political party, either directly or indirectly. By establishing clear internal guidelines on political participation, the Company seeks to prevent conflicts of interest, promote fairness and safeguard its brand perception as a trusted and globally respected organization.

#### 2. Scope

This Policy applies to the Company, its subsidiaries, relevant business units and all levels of personnel, including directors, executives, permanent and contract employees, and individuals acting on behalf of the Company. It sets out clear guidelines and practices to ensure that all parts of the organization maintain political neutrality and operate without political influence or conflicts of interest.

The scope of this Policy covers both internal and external organizational activities and includes:

- Political communication or expression by personnel that could affect the Company’s brand perception
- Use of Company resources or assets, directly or indirectly, to support political parties or political groups
- Participation in political activities by personnel that could give the impression of Company endorsement or affiliation
- Compliance with all applicable laws and regulations governing political participation by the organizations and individuals

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## 3. Objectives

- To promote good governance and transparency in business operations
- To prevent conflicts of interest and legal risks
- To prevent the use of one's position or authority for political benefit

## 4. Roles and Responsibilities

To ensure the effective management of political participation in line with principles of good governance, transparency and international practices, the roles and responsibilities of relevant functions and individuals have been defined as follows:

### 4.1 Board of Directors

- Oversee and approve this Policy to ensure it remains aligned with good governance principles, sustainability goals and business strategy
- Review this Policy at least annually, or when there are changes in applicable laws, regulations or relevant standards, to ensure alignment with best practice
- Monitor and assess political-related risks that may impact the organization, and define appropriate preventive measures

### 4.2 Senior Management

- Oversee organizational operations to ensure political neutrality and prevent any support any political parties or political groups
- Allocate resources and develop guidelines that enable employees to carry out their responsibilities in a politically neutral, safe and in line with best practices
- Monitor political trends that may affect the organization and report to the Board of Directors to ensure no actions are taken that may pose a business risk
- Support the development of risk management practices related to political participation to ensure the Company operates in accordance with ethical business standards

### 4.3 Corporate Governance and Risk Management

- Develop practices and audit processes to prevent the use of Company resources in support of political activities
- Assess and monitor risks related with political activities or participation by personnel that may affect the Company
- Provide guidance and advice to employees on compliance with the Policy and appropriate actions in cases of potential conflicts of interest

### 4.4 Employees

- Comply with the Company's political participation guidelines and avoid any behavior that may create misunderstandings about the organization's affiliation with any political party

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- Do not use Company resources, including working hours, to engage in or support political activities, whether directly or indirectly
- Avoid using one's position, role or authority to pressure or persuade colleagues, suppliers or others to participate in political activities
- Report any behavior that may pose a risk of breaching the Policy to the relevant function

## 4.5 Relevant Functions

- Ensure that corporate communications and marketing activities do not contain content that implies support for any political party or political group
- Control and manage the dissemination of information to ensure all Company communications remain neutral and free of political content
- Provide guidance to employees and internal units on appropriate practices for politically neutral communication

## 5. Policy and Practices

- 5.1) The Company is politically neutral and does not support or engage in any conduct that suggests loyalty or affiliation with any political party or group for political benefit, directly or indirectly. This includes refraining from any activities that may create the impression that the Company is involved in political activities.
- 5.2) Central Pattana must conduct regular political risk assessments by considering internal and external factors that may affect the organization, and develop appropriate risk management plans.
- 5.3) Employees must comply with applicable laws and remain politically neutral. They must not use their position or authority for political purposes, or engage in any conduct that may create risks or lead to conflicts of interest related to political activities.
- 5.4) Employees have the right to participate in political activities in their personal capacity, provided this does not interfere with their responsibilities, or create the impression that the Company supports or is affiliated with any political party or group. Participation must comply with applicable laws, and must not affect brand perception.
- 5.5) Employees must not use Company property, resources, or services for political purposes, either directly or indirectly. This includes using work hours, Company logos, facilities or facilities to suggest support or affiliation with any political party.
- 5.6) All communication with government agencies must comply with applicable rules, regulations and business ethics. Where coordination with government entities is required, it must be carried out transparently and legally, without serving the political interests of the Company or any individual.

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- 5.7) Employees must not use their authority to pressure or persuade others to support any political party, coerce, or unfairly influence colleagues, customers, suppliers or stakeholders in matters relating to politics.
- 5.8) The Company has in place political risk oversight and management measures to prevent actions that may adversely affect the organization. The Company also sets out clear guidelines and monitors and evaluates progress on an ongoing basis.

## **6. Training**

The Company recognizes the importance of building knowledge, understanding and awareness among employees and relevant parties regarding political participation practices. This ensures that all parties operate in a proper, transparent and policy-compliant manner. The Company communicates relevant guidelines and requirements through multiple channels, including internal meetings, digital communications and learning materials, to make them readily accessible and applicable in practice.

## **7. Complaints and Whistleblowing**

The Company is committed to fostering an open, transparent and safe workplace culture. Designated channels are available for employees, suppliers and stakeholders to report concerns related to any potential breaches of this Policy. This includes the use of Company resources to support political parties, participation in political activities that may give rise to conflicts of interest or any conduct that could adversely affect the Company's brand perception. A structured process is in place to receive, investigate and resolve such reports. Relevant functions are responsible for assessing concerns and determining appropriate actions. The Company places strong emphasis on maintaining the confidentiality of complainants and ensuring protection against retaliation or any adverse consequences resulting from reporting.

## **8. Disciplinary Action**

The Company maintains a strict policy of political neutrality and operates in accordance with principles of business ethics. If any employee is found to have engaged in political activities that conflict with this policy, such as using company resources to support political parties, leveraging their role to pressure or persuade others to participate in political activities, or engaging in conduct that may give rise to a conflict of interest, the Company will take appropriate disciplinary action, proportionate to the severity of the misconduct. Sanctions may include a formal warning, guidance on corrective actions, disciplinary proceedings or other measures in line with the Company's internal regulations. In the case of business partners or counterparties, if a breach of the established principles is identified, the Company will assess a joint resolution

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approach. Where serious violations are found, the Company may consider reviewing or terminating the relationship. These measures are intended to preserve transparency in business operations and maintain the trust of stakeholders.

## **9. Policy Review and Update**

The Company is committed to continuously improving this Policy to ensure it remains up to date and aligned with the evolving business context. The Policy will be reviewed and updated on a periodic basis, at least annually, or when material factors arise that affect its implementation, such as changes in laws, good governance requirements, political trends or international standards.

This Policy is effective from May 2, 2025 onward.