

CENTRALPATTANA

Competition Policy

Central Pattana Public Company Limited

1. Introduction

Central Pattana Public Company Limited and its subsidiaries (the "Company") recognize the importance of fair and transparent competition as a foundation for sustainable business development. Weak or inadequate management in this area can severely undermine the Company's credibility, diminish stakeholder trust and jeopardize the broader economic stability. It may also result in serious legal violations and significant business consequences.

To uphold its commitment to integrity, transparency and ethical conduct, the Company has established this Competition Policy to ensure full compliance with applicable national and international laws, regulations and standards. The Company is committed to promoting fair and transparent competition, encouraging innovation, enhancing product and service quality, and delivering value to consumers, while preventing conduct that may undermine market fairness.

2. Scope

This Policy applies to the Board of Directors, executives and employees at all levels, as well as suppliers, business partners and subcontractors involved in conducting business on behalf of the Company, both in Thailand and internationally. It covers all stages of the Company's operations and business processes and requires all relevant parties to strictly comply with applicable competition laws, regulations and standards. All parties must also avoid conduct that may violate the principles of fair competition.

3. Objectives

- To promote fairness in the market through transparent and ethical business conduct to reduce the risk of anti-competitive behavior and strengthen stakeholder trust
- To ensure that all personnel and relevant parties comply with applicable laws, regulations and international standards on fair competition
- To support continuous improvement in product and service quality, increase value and enhance consumer satisfaction, while promoting innovation that benefits society and the environment
- To foster a competitive environment that supports long-term economic and social growth, underpinned by good governance and community responsibility
- To prevent conduct that may lead to breaches of applicable laws or ethical standards
- To encourage employees, suppliers and business partners to adhere to this Policy and foster a culture of transparency, fairness and credibility across the operations

4. Roles and Responsibilities

To ensure the effective implementation of this Policy in line with good governance principles, the roles and responsibilities of relevant functions and individuals have been clearly defined to support transparent, fair and lawful business operations as follows:

4.1 Board of Directors

- Oversee and support this Policy to ensure alignment with the Company's strategic objectives and governance principles
- Review this Policy at least annually, or when there are changes to applicable laws, regulations or international practices
- Review performance reports and assess alignment between the Policy and the Company's strategic objectives, to strengthen market credibility

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4.2 Senior Management

- Allocate necessary resources, including personnel, budget and technology, to support the effective implementation of this Policy
- Establish internal practices and promote strict compliance with applicable laws and the Company's Competition Policy across all levels of the organization
- Monitor competition risks and report any issues or situations that may violate fair competition principles to the Board or relevant sub-committees for timely resolution
- Support the development of innovations and practices that promote equity and transparency in the business market

4.3 Relevant Functions

- Develop and implement processes that support effective compliance with this Policy
- Assess and analyze competition-related risks, and implement preventive or corrective measures, where necessary
- Provide ongoing training and communication on the Policy to b employees, suppliers and business partners to strengthen understanding and compliance
- Report progress, issues and recommendations to senior management to support continuous improvement and alignment with the Company's strategic objectives

4.4 Employees

- Comply strictly with this Policy and promote transparency and fairness in all operational processes
- Report any behavior or actions that may violate fair competition principles to a supervisor or relevant function to support appropriate prevention and remediation
- Perform duties with integrity and ethical conduct, taking into account the impact on stakeholders and the broader market
- Participate in training and activities to build knowledge and capabilities that support fair competition

5. Policy and Practices

- 5.1) The Company adheres to the principles of fair competition. It does not seek to obtain confidential information about competitors by dishonest means, nor engage in conduct that may negatively affect competitors or stakeholders, such as misrepresenting facts, making false claims or accusations, or using inappropriate methods to gain a competitive advantage.
- 5.2) Employees must familiarize themselves with, and strictly comply with all applicable competition laws. They must not engage in any conduct that may violate these laws, including price fixing, market allocation or the inappropriate exchange of information with competitors.
- 5.3) The Company promotes transparent industry collaboration to support a competitive environment that drives innovation, enhances product and service quality and reduces environmental impact, in order to maximize benefits for consumers and the broader economy.
- 5.4) The Company provides ongoing training and communication to ensure that employees and relevant parties at all levels understand the principles of fair competition, and continues to develop practices that align with this Policy.
- 5.5) The Company maintains transparent channels for receiving complaints or whistleblowing related to conduct inconsistent with this Policy. All reports will be appropriately investigated and resolved to prevent potential impacts and uphold stakeholder trust.
- 5.6) This Policy will be reviewed and updated on a regular basis, or when there are changes to applicable laws, regulations or relevant circumstances, to ensure its continued relevance and effectiveness in a changing environment.

6. Training

The Company is committed to promoting understanding and compliance with this Policy across all parts of the organization. The Policy is communicated through a range of channels, including meetings, classroom training and e-learning courses, handbooks, information materials, and communication tools such as posters, social media content, short videos, games, awareness campaigns, or integration into other Company activities. These efforts aim to make the Policy easily accessible and enable professional application in day-to-day business operations.

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7. Complaints and Whistleblowing

The Company provides all employees and stakeholders with the opportunity to raise complaints or report conduct that may be inconsistent with this Policy. A transparent and secure process is in place that safeguards the rights, safety and confidentiality of complainants, ensuring that no retaliation or adverse consequences result from raising a concern. The Company is committed to resolving all matters with transparency, accountability and fairness, and to fostering an organizational culture that promotes fair and transparent competition.

8. Disciplinary Action

The Company places strong emphasis on strict compliance with this Policy. All relevant employees are required to fully cooperate in any review or investigation into suspected breaches of this Policy. Where violations are identified, the Company will take appropriate action in accordance with established procedures, which may include formal warnings, disciplinary measures or legal proceedings. These actions aim to support transparent, fair and ethically grounded competition practices.

9. Policy Review and Update

The Company reviews and updates this Policy at least annually, or changes in applicable laws, regulations or relevant business conditions occur, to ensure it remains aligned with the evolving context. The Company is also committed to continuously improving the Policy and related practices to promote fair competition, transparency and ethical business conduct, with the aim of building stakeholder trust and supporting long-term sustainable development.

This Policy is effective from May 2, 2025 onward.