

Revolving Door Policy

Ek-Chai Distribution System Co., Ltd.

Purpose

Ek-Chai Distribution System Co., Ltd. ("**Company**") sets policy for employment of public or former public officials (Revolving Door Policy) to comply with the good governance and Anti-Bribery Policy and to ensure that any engagement or appointment of the public or former public official to be the Company's staffs is transparent and is not used in exchange with any improper benefit. For avoidance of doubt, this policy does not prohibit employment of public or former public officials, but is as guideline to efficiently manage risk that might occur.

Scope of Policy

This Policy applies to any employment of director, management, employee, outsourced staff, representative or consultant of the Company.

Definition

Public Official means deliberately broad and includes, among others, elected and non-elected officials holding a legislative, administrative, or judicial position. It also includes those performing public functions in national, local or municipal government or for any public agency or public enterprise, and executives or officers exercising public functions in state-owned enterprises. Examples of public officials could be local city planning officers granting permits for building stores, a harbour master at a government run port providing clearances for a shipment of our goods or an employee of a government run business where the government has a large degree of control over the enterprise.

NACC means National Anti-Corruption Commission.

Procedure for employment of public or former public official

Employment of the Company will be in line with intention of the Organic Act on Anti-Corruption ("**OAAC**") with an aim to prevent any conflict between personal interest and public interest which can ruin Company's trustworthy, reliability and reputation. Necessary and suitability will be taken into account before hiring of public or former public official to act as the Company's director, management, employee, outsourced staff, representative or consultant. Given that, the Company will follow the below procedures.

1. Company will not employ any public or former public official who is prohibited under section 126 (4) and section 127 of the OAAC as follows:

- 1.1 Any person being a relevant stakeholder as a director, or any position in private entity, including a public official prescribed by NACC, which under the supervision, monitoring, control or inspection of a state agency to which such public official is attached or performs duties as the public official which, by nature of such business interest of the private entity, may be in conflict to or against the public interest or government interest, or affect the independence of the performance of duties of such public official. This shall be applied to the spouse of such public official. Undertaking of business by the spouse shall be deemed as undertaking of business of the public official except in the case where the spouse has undertaken such business prior to the public official's taking of office.
 - 1.2 Any person who used to be a relevant stakeholder as a director, or any position in private entity or holding high-ranking positions and any person holding political positions as prescribed by the NACC, which those businesses are under the supervision, monitoring, control or inspection of a state agency to which such public official is attached or performs duties as the public official which, by nature of such business interest of the private entity, may be in conflict to or against the public interest or government interest, or affect the independence of the performance of duties of such public official, and has not yet vacated the position for two years.
2. Company, by People Team, will interview and examine any employment of public or former public officials in order to ensure compliance with the Company's procedure.
 3. Company will communicate this Revolving Door Policy to internal functions relevant to this matter.
 4. Company, by People Team, is responsible for verification of any employment of public or former public officials to be in accordance with this Policy. In case such employment may occur, this must be immediately reported to the People Director for consideration.

Policy Review

This Revolving Door Policy should be regularly reviewed or at least once a year or if there is any change of subject matter, it should be amended immediately by the People Director. Any policy, regulation, order, record and notification related to employment of public or former public officials which may be conflict to this policy should be revoked and this policy shall prevail.

This Revolving Door Policy had been considered and approved by Board of Directors of Ek-Chai Distribution System Co., Ltd. No. 19/2565 held on 30 November 2022, which became effective from 1 December 2022.