



## COMPLIANCE POLICY

WHA Corporation Public Company Limited

Approved by the Board of Directors' Meeting No. 1/2025 on March 14, 2025  
Effective as of March 14, 2025



(English Translation)

Compliance Policy

WHA Corporation Public Company Limited and its group of companies (“WHA Group”) consist of four main business sectors: Logistics Business, Industrial Development Business, Utilities & Power Business, and Digital Business. WHA Group is committed to conducting its business with the utmost integrity, fairness, and transparency, while adhering to applicable laws, codes of conduct, and best practices in corporate governance.

WHA Group has established this Compliance Policy for directors, executives, and employees at all levels to emphasize the importance of performing duties in compliance with applicable laws, rules, regulations, and Codes of Conduct. Strict adherence to these policies will foster trust and confidence, further advancing WHA Group’s objective of becoming a globally recognized leader.

Definitions:

“Rules and Regulations” refers to applicable laws, rules, regulations, contractual obligations, Code of Conduct, internal policies, operating standards, and other practices that WHA Group must comply with or adhere to in its business operations. This includes, but is not limited to, the regulations set forth by the Stock Exchange of Thailand (SET) and the Securities and Exchange Commission (SEC).

“WHA Group” means to WHA Corporation Public Company Limited and its subsidiaries as per the consolidated financial statements.



“Governance” or “Compliance” means the processes utilized for preventing any activity that does not comply with the relevant Rules and Regulations pertaining to WHA Group, as well as to mitigate the potential impacts of non-compliance through various methods, such as support, training, communication, awareness-building, control, monitoring and assessment, auditing, and/or reporting of operations to ensure that the operations of the WHA Group align with and adhere to the applicable Rules and Regulations.

**Compliance Policy:**

1. All directors, executives, and employees of WHA Group strictly respect, adhere to, and comply with the applicable Rules and Regulations pertaining to its business operations, both domestically and internationally. WHA Group does not tolerate any violation of relevant Rules and Regulations.
2. Compliance with Rules and Regulations is an integral part of the duties that each of the directors, executives, and employees of WHA Group must strictly adhere to. They have a responsibility to be aware of and understand how their work relates to or must comply with these Rules and Regulations, including understanding the impacts and damage that may result from non-compliance or inconsistent practices with the Rules and Regulations. Employees may be subjected to disciplinary action in accordance with WHA Group’s work regulations.
3. Each director, executive, and employee of WHA Group shall actively participate in communication, promoting, and supporting knowledge and understanding of compliance to ensure that compliance with the Rules and Regulations, and become tangible and effective, as well as raise awareness and further fortify WHA Group’s culture of honesty, integrity, and strict adherence to WHA Group’s Rules and Regulations.
4. WHA Group has established effective Governance, control, supervision, and risk prevention mechanisms. This includes emphasizing various forms of Compliance systems including the Audit Committee, the Corporate Governance and Sustainable Development Committee,





and the Risk Management Committee. These bodies are designed to enhance, support, and oversee the efficient and compliant operations of WHA Group, as well as continuously improving and developing operational working processes and practices.

5. If there are any suspicions or discoveries of actions that do not comply with the relevant Rules and Regulations, it shall be the duty of directors, executives, or employees of WHA Group to report such incidents to their supervisors or relevant departments, or through designated channels. In addition, they must also provide full cooperation in the investigation process to ensure adherence to the standards stipulated in the Code of Conduct and Practices, particularly under Whistleblowing or Complaint Channels. All departments must cooperate with the Compliance team to support problem resolution, risk prevention and management, and the continuous improvement and enhancement of WHA Group's Corporate Governance.
6. Individuals who report, provide information, or whistle blow on any actions that do not comply with the relevant Rules and Regulations will be appropriately protected. All information provided will be kept confidential, with due consideration given to the safety and the potential harm of the whistleblower, the source of the information, and any individuals involved.

#### Roles, Duties, and Responsibilities of the Compliance Function

The Compliance function is WHA Group's Corporate Division that is responsible for monitoring compliance in operations, advising, supporting, monitoring, and analyzing data, as well as assessing and reporting on regulatory compliance. Its roles and responsibilities are detailed as follows:

1. To formulate a policy that ensures the supervision of operations in Compliance with the Rules and Regulations of WHA Group (Compliance Policy), and to coordinate with relevant





departments in establishing this Policy, Code of Conduct, and other related practices to align with applicable Rules and Regulations. This includes the annual review and improvement of the Policy, Code of Conduct, and other practices to reflect current circumstances, thereby ensuring that executives and employees adhere to the Rules and Regulations appropriately.

2. To engage and coordinate with other departments regarding regulations, rules, orders, announcements, Code of Conduct, and other practices, both internal and external to the organization, that are related to the operations of WHA Group.
3. To oversee and monitor the performance of all departments within the organization to ensure adherence to applicable Rules and Regulations governing WHA Group's activities.
4. To develop an annual audit or review plan (Compliance Plan), detailing the audit scope and timeline, in coordination with the Internal Audit department and/or other relevant units both within and outside the organization. This is to enhance the effectiveness of the audit or review process while minimizing redundancy. The audit or review shall be conducted according to the predefined plan.
5. To prepare a detailed summary and report on the oversight of operations, including progress in addressing deficiencies arising from non-compliance with rules, regulations, directives, announcements, Code of Conduct, and other practices. The report should also include recommendations for improvement and be presented to executives following the chain of command, and, as appropriate, to various WHA Group committees or the Executive Committee on a quarterly basis.
6. To follow up on the implementation of corrective actions from the performance audit report to ensure compliance with the rules, regulations, directives, announcements, Code of Conduct, and other practices within the designated timeframe.





7. To coordinate with relevant departments to deliver communication, training, and advisory support WHA Group personnel regarding the regulations governing the Group's operations. This effort aims to foster a thorough understanding of compliance requirements and promote awareness of the consequences of non-compliance, contributing to a positive corporate culture grounded in regulatory adherence.

This Compliance Policy has been reviewed and considered by the Corporate Governance and Sustainable Development Committee at its meeting No.1/2025 on February 6, 2025 and subsequently approved by the Board of Directors at meeting No. 2/2025 on March 14, 2025.

*-Mr. Somkid Jatusripitak-*

(Mr. Somkid Jatusripitak)

Chairman of the Board of Directors

WHA Corporation Public Company Limited

