CHRISTIANI & NIELSEN

DECLARATION OF INTENT
Anti-Corruption Commitment

Christiani & Nielsen (Thai) Public Company Limited and its subsidiaries (collectively referred to as the "Company") are committed to conducting business with integrity, honesty, transparency, fairness, and accountability. The Company adheres to business ethics, good corporate governance principles, and strict compliance with all applicable laws, regulations, contractual obligations, and relevant requirements, including those relating to business dealings with government agencies.

The Company recognizes that corruption, bribery, improper solicitation of benefits, conflicts of interest, and the offering of inappropriate gifts or benefits may cause damage to the Company, shareholders, customers, business partners, employees, government agencies, and all stakeholders. Accordingly, the Company declares its commitment to preventing and combating corruption in all forms, whether direct or indirect, as follows:

1. Conduct Business with Transparency and Zero Tolerance for Corruption
The Company shall conduct business in a transparent, fair, and accountable manner and shall not tolerate corruption, bribery, improper solicitation of benefits, or any conduct that may result in unfair business practices. Directors, executives, employees, and relevant parties must perform their duties honestly and ethically and avoid any actions that may create conflicts of interest or adversely affect the Company's reputation.

2. Prohibit Bribery of Government Officials
The Company shall not offer, promise, give, request, or accept money, gifts, hospitality, donations, sponsorships, or any other benefits to or from government officials, foreign public officials, officials of international organizations, or any other persons for the purpose of influencing an improper act, omission, or delay in the performance of duties. The Company does not support such conduct, whether directly or indirectly.

3. Strict Compliance with Laws and Government Requirements
The Company places great importance on compliance with laws, regulations, Terms of Reference (TOR), contractual obligations, and requirements relating to business dealings with government agencies. The Company shall perform its contractual obligations transparently, fairly, and completely and shall not support bid rigging, misuse of insider information, or any conduct that compromises the fairness of public procurement processes.

4. Prevention of Conflicts of Interest
Directors, executives, employees, and relevant parties must avoid situations that may create conflicts between personal interests and the interests of the Company. Any actual or potential conflict of interest must be disclosed to a supervisor or the designated responsible function to ensure appropriate and transparent management.

5. Adherence to the No Gift Policy
The Company adopts a **No Gift Policy** and prohibits the giving or receiving of gifts, assets, or any other benefits from government officials, customers, business partners, or other related parties where such benefits may influence decision-making, create obligations, or result in conflicts of interest. Compliance with applicable laws and Company policies is required at all times. Where refusal is not practical, the matter must be reported in accordance with Company procedures immediately.

6. Promote a Culture of Zero Tolerance for Corruption
The Company promotes a culture based on the principle of **"No Giving, No Receiving"** and encourages all relevant parties to adhere to the No Gift Policy and anti-corruption practices. The Company also encourages individuals to reject inappropriate benefits and to report any suspected misconduct or unethical behavior.

7. Governance and Disciplinary Measures
The Internal Audit Department is designated as the primary coordinating function responsible for monitoring and reporting anti-corruption activities. Supervisors at all levels are responsible for ensuring compliance with Company policies. Violations may result in disciplinary action and, where applicable, legal proceedings.

8. Continuous Monitoring, Review, and Improvement
The Company shall review its anti-corruption policies, measures, and practices on an annual basis, or whenever significant changes occur, to ensure that they remain appropriate, effective, and sufficient to prevent and mitigate corruption risks.

9. Communication and Awareness
The Company shall communicate its anti-corruption commitment, policies, and practices to directors, executives, employees, business partners, and related parties through appropriate channels. The Company shall also provide training and awareness activities to promote strict compliance with Company policies, business ethics, and applicable laws.

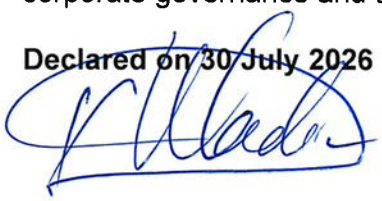
10. Whistleblowing and Protection of Whistleblowers
The Company encourages all stakeholders to report any suspected corruption, bribery, conflicts of interest, or unethical conduct. Reports will be handled fairly and confidentially, and whistleblowers acting in good faith will be protected from retaliation.

11. Monitoring and Implementation
The Company requires executives at all levels to lead by example and promote compliance with this Declaration throughout the organization. The Company shall regularly monitor, review, and assess anti-corruption activities to ensure effective implementation across the organization.

12. Effective Date
This Declaration shall become effective from the date of issuance.

The Company firmly believes that integrity, honesty, and transparency are fundamental to sustainable growth and calls upon directors, executives, employees, and all related parties to uphold and comply with this Declaration in order to foster a transparent organization with strong corporate governance and the trust of all stakeholders.

Declared on 30 July 2026



Mr. Khushroo Wadia
Chief Executive Officer
Christiani & Nielsen (Thai) Public Company Limited