Anti-Fraud and Corruption Policy

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Thai Airways International Public Company Limited (the "Company") is committed to conducting its business in accordance with the principles of good governance and the corporate governance guidelines of the Securities and Exchange Commission (SEC) and the Stock Exchange of Thailand (SET). as well as upholding standards of ethics and business conduct to promote efficient business operations with integrity, transparency, and accountability, while maintaining a zero-tolerance approach to fraud and corruption. In addition, the Company is committed to complying with applicable laws, rules, and regulations to build confidence and trust among all stakeholders and to demonstrate its commitment to combating all forms of corruption, whether direct or indirect.

The Company's Board of Directors, at the special meeting No. 8/2026 held on 28 August 2026, resolved to approve the Anti-Fraud and Corruption Policy. Directors, executives, and employees at all levels (collectively, the "Company Personnel"), as well as persons associated with the Company, shall acknowledge and strictly comply with this Anti-Fraud and Corruption Policy.

Definitions

Definition	Description
Director	A person holding as a director of the Board of Directors of Thai Airways International Public Company Limited.
Executive	A person holding a position of team lead or higher.
Employee	A monthly salaried employee employed by Thai Airways International Public Company Limited on a permanent basis and receiving monthly salary through the Company's payroll system, and an employee employed by the Company under a fixed-term employment contract with the Company, regardless of whether such employee holds an executive position, including the Chief Executive Officer.
Company Personnel	Directors, Executives and Employees.
Person associating with the Company	Business partners, subsidiaries, associates, related companies, or any person acting for or on behalf of the Company, whether or not authorized to do so, including but not limited to distributors, dealers, brokers, intermediaries, independent contractors, consultants, agents, joint ventures, suppliers, vendors, accountants, lawyers, and supply chain partners.

Definition	Description
Fraud	Intentional acts undertaken to obtain improper benefits for oneself or others, such as family members, relatives, friends, or close associates. Fraud may be classified into three (3) categories: corruption, misappropriation of assets, and fraudulent reporting. Fraud includes, but is not limited to, the following: • Improper financial management, reporting, or transactions • Seeking benefits from the use of the Company's information • Disclosure of the Company's confidential and proprietary information to external parties • Destruction, disposal, or improper use of the Company's information and assets • Providing anything of value to government official or person associated with the Company with the intent to obtain or retain business • Engaging in other dishonest or deceptive conduct.
Corruption	The unlawful seeking of benefits for oneself or others, whether directly or indirectly, including but not limited to giving, offering, promising to give, receiving, demanding, or requesting bribes, gifts, hospitality, entertainment, sponsorship, donations, political support, or engaging in conflicts of interest, whether in the form of money, property, or any other improper benefit, in order to cause a person to act or refrain from acting in the performance of duties to obtain a business advantage, except where permitted by law, regulations, announcements, rules, local customs, traditions, or trade practices. Corruption is not limited to relationships between the private sector and the government entities but also covers transactions between individuals or entities within the private sector.
Subsidiary	A company or public limited company in which the Company: (a) holds voting shares exceeding 50 percent of the total voting rights; (b) has the power to control the majority of votes at shareholders' meetings, whether directly or indirectly or for any other reason; or (c) has the power to control the appointment or removal of at least half of all directors, whether directly or indirectly.

Definition	Description
	Note: Subsidiaries include: • Thai-Amadeus Southeast Asia Co., Ltd. • Thai Flight Training Co., Ltd. • Wingspan Services Co., Ltd. • Tour Eurng Luang Co., Ltd. • Thai MRO Group Co., Ltd. • Thai MRO Services Co., Ltd.
Associated Company	A company or juristic person in which Thai Airways International Public Company Limited holds at least 20 percent but no more than 50 percent of the shares, where the Company invests to support business operations but does not have control.
Related Company	A company or juristic person in which Thai Airways International Public Company Limited holds less than 20 percent of the total voting shares and does not have control over the business.
Government Entity	Government department, state enterprise, public organization, local administrative organization, independent constitutional body, and any other agency established by law and/or under state control, supervision, oversight, or state shareholding, whether wholly or partially, in Thailand or abroad.
Government Official	A political office holder, public servant, or local government employee with an official position or regular salary; an employee or worker in a state enterprise or government entity; a local executive; a local council member who is not a political office holder; and an official under the law governing local administration. This also includes directors, sub-committee members, employees of government departments, state enterprises, or government entities, and any person or group authorized or delegated to exercise administrative power of the state in carrying out any act under the law, whether within the civil service system, a state enterprise, or any other state activity.
Giving and Accepting Gifts	Giving or accepting anything of value, goods, or other benefits as a gesture of goodwill, whether directly or indirectly. This also includes items given or received as part of normal social courtesy or local customs, such as New Year gifts, birthday gifts, gifts on the occasion of a promotion to a new position.

Definition	Description
Giving and Accepting Entertainment, Hospitality, or Other Benefits	Giving or accepting activities intended to build good relationships or demonstrate social courtesy, including entertainment (meals, beverages, accommodation, and travel), hospitality (welcoming and assisting visitors with friendliness and care so they feel comfortable and satisfied), or other benefits (discounts, entertainment, services, training, tickets, seat/class upgrades, baggage allowance, cargo allowance, and similar benefits), provided that such actions do not affect work-related decision-making or create conflicts of interest.
Giving and Accepting Sponsorship	Giving or accepting financial support, assets, benefits, or organizing publicity activities to build image and social responsibility for or from persons associated with the Company, including government entities, government officials, and various organizations, where the Company expects its name, trademark, or business benefits to be publicized in an open and lawful manner.
Giving and Accepting Charitable Donations	Giving or accepting donations of money, assets, or activities carried out for public benefit, charity, religion, education, public health, and social causes to or from persons associated with the Company, including government entities, government officials, and various organizations, without the intent of exchanging direct or indirect business benefits and without expecting commercial returns.
Political Contributions	The use of organizational funds, assets, resources, work time, tools, equipment, communication channels, or services to provide political assistance or support, or to assist any political party, politician, or political candidate.
Facilitation Payments	A small unofficial payment made to a government official solely to ensure that the official carries out a routine process or to expedite it, where the process does not require the official's discretion and is already within the official's lawful duties, and where the legal entity is already entitled to the service under the law, such as applying for permits, certificates, or public services, etc.

Definition	Description
Conflict of Interest	A conflict between personal interests and the public interest. It refers to a situation or action in which directors, executives, or employees have personal interests that affect decision-making or the performance of duties in their positions and thereby affect the public interest. Such conduct may occur knowingly or unknowingly, intentionally or unintentionally, in many forms, and may become common practice without being recognized as improper, causing the person to lack impartial judgment because personal benefit is given priority.

Roles and Responsibilities

To establish clear and practical governance regarding anti-fraud and corruption measures, and to ensure strict compliance within the organization, the Company has designated personnel responsible for overseeing anti-fraud and corruption operations. Accordingly, the Company has defined the following roles and responsibilities:

1. **The Board of Directors** has the role and responsibility to establish the Anti-Fraud and Corruption Policy. If fraud and corruption are identified, the Board of Directors is responsible for reviewing the matter and considering appropriate penalties in a fair, transparent, and accountable manner.

2. **The Audit Committee** has the role and responsibility to oversee the internal control system, accounting system, and financial reporting, as well as any other processes relating to fraud, corruption, misconduct, irregularities, or deficiencies, in order to ensure that such processes are supported by internal controls that are sufficiently effective and appropriate to prevent the risk of fraud and corruption.

3. **The Risk, Governance and Sustainability Oversight Committee** has the role and responsibility to oversee, monitor, and support fraud and corruption risk assessments, including providing policy-level advice, opinions, and recommendations on appropriate control and prevention measures, as well as regularly monitoring implementation progress.

4. **The Executive Management Meeting** has the role and responsibility to review and approve practices, criteria, or other orders related to anti-fraud and corruption to ensure that the Company's operations are appropriate and consistent with the Anti-Fraud and Corruption Policy.

5.The Corporate Compliance Department has the role and responsibility to coordinate, monitor, communicate, provide guidance or consultation on compliance with the Anti-Fraud and Corruption Policy, and cooperate with the Human Resources Development Division to organize training courses related to the Anti-Fraud and Corruption Policy to raise awareness of anti-fraud and corruption, as well as oversee the Company's operations to comply with the requirements of the Thai Private Sector Collective Action Against Corruption (CAC), including reviewing the Anti-Fraud and Corruption Policy and other related procedures.

6. The Risk Management Department has the role and responsibility to facilitate regular fraud and corruption risk assessments, coordinate with and provide guidance to risk-owners, and provide information when issues relating to fraud and corruption risks or newly emerging issues arise

7. The Internal Audit Office has the role and responsibility to audit and review the Company's internal control systems, review transactions that may give rise to conflicts of interest, fraud, corruption, and misconduct, assess the effectiveness of the organization in managing risks of fraud, corruption, and misconduct, and coordinate with the corporate compliance, risk management, and internal control functions to raise significant issues to the Audit Committee.

8. Company Personnel have the role and responsibility to strictly comply with the Anti-Fraud and Corruption Policy without exception. If there is any doubt or any observed violation, company personnel must report to their supervisor or submit information or misconduct details through the whistleblowing or complaint channels.

<u>Anti-Fraud and Corruption Policy</u>

1. Company Personnel have the role and responsibility to understand and strictly comply with the Anti-Fraud and Corruption Policy, Good Corporate Governance Handbook as well as the Company's rules, regulations, and work rules in order to prevent fraud and corruption risks in all forms.

2. Company personnel must not commit any fraudulent acts, such as corruption, misappropriation of the Company's assets, improper use of the Company's assets or resources, falsification of documents or evidence, distortion of information, false disbursements, reporting incorrect information, collusion in any form of fraud, etc.

3. Company Personnel are prohibited from engaging in any acts related to corruption, whether directly or indirectly, for the benefit of oneself, family, friends, relatives, or acquaintances, regardless of whether as a recipient, provider or offeror of bribes, either in monetary or non-monetary form, to any government entities or private entities with which the Company has business dealings or contact with.

4. Company Personnel must comply with the Company's policies and guidelines relating to anti-fraud and corruption, including giving and accepting gifts, entertainment, hospitality or any other benefits, sponsorships, charitable donations, political contributions, and prevention of conflicts of interest.

5. Company Personnel must prepare and maintain accurate, complete, up-to-date and auditable accounts, documents, and financial records. False entries, off-book records, or concealment of information relating to all types of Company transactions are prohibited.

6. Company Personnel must help monitor or immediately report any suspected or observed fraud and corruption, and cooperate in investigations related to suspected fraud and corruption by reporting such information to the authorized recipient, so that actions can be taken in accordance with the Company's Regulation: "Complaints and Whistleblowing regarding Fraud and Non-Compliance with Laws, Rules and Organization Regulations".

7. The Company places importance to complaints received from Company personnel and any person associating with the Company who have witnessed any acts affecting the Company involving fraud and corruption, or non-compliance with laws, rules, regulations, requirements, or Company orders. The Company will conduct a factual investigation on the basis of fairness, transparency and accountability.

8. The Company assures that none of the Company personnel will be demoted, punished, or adversely affected for refusing to give or receive bribes or corruption in any form, even if such refusal causes the Company to lose business opportunities. The Company will not tolerate any form of intimidation, threats, or coercion against Company personnel who are committed to complying with the Anti-Fraud and Corruption Policy.

Whistleblowing, Suggestions, Complaints, and Protection of Whistleblowers, Suggestion Providers, and Complainants

The Company provides safe communication and protective measures for whistleblowing, suggestions and complaints including evidence relating to fraud and corruption, which may be submitted by scanning the QR Code or through the Company's website www.thaiairways.com. This is in accordance with the Company's regulation: "Complaints and Whistleblowing regarding Corruption and Non-Compliance with the Laws, Rules and Organization Regulations".

In addition, in the case where the Company personnel and the person associating with the Company would like advice regarding compliance with this Policy, they may consult the Corporate Compliance Department with confidence and in a secure manner.

Protection Measures for Whistleblowers, Suggestion Providers, and Complainants

The Company has established protection mechanisms for whistleblowers, suggesters, complainants, or persons who cooperate in reporting fraud and corruption in order to promote confidence and safety. The Company will not disclose the identity of any whistleblower, suggestion providers, or complainant during or after an investigation and will provide appropriate and fair protection.

Any Company personnel who become aware of whistleblowing information, suggestions, or complaints must keep such information confidential and must not disclose it to any other person, except where disclosure is required by law, by order of an administrative authority or lawful official, or by court order. Any intentional unauthorized disclosure will result in action under Company regulations and/or legal proceedings, as appropriate.

Penalties

The Company imposes penalties on Company personnel who do not comply with the Anti-Fraud and Corruption Policy. Disciplinary measures include the removal of directors or penalties in accordance with the Company's disciplinary regulations for executives and employees at all levels. Those who violate these measures will be subject to disciplinary action under the Company's rules and regulations, and may also face legal consequences, both criminal and civil.

If a person associated with the Company fails to comply with the Anti-Fraud and Corruption Policy, the Company may consider terminating any transactions with that person.

Requesting Advice or Consultation

The Company has established the following channels for obtaining advice or consultation regarding compliance with the Anti-Fraud and Corruption Policy:

- Corporate Compliance Department, telephone: 02-545-3566 and 02-545-2686
- Mailing address: Thai Airways International Public Company Limited, 89 Vibhavadi Rangsit Road, Chom Phon Subdistrict, Chatuchak District, Bangkok 10900
- Email: bkk3coffice@thaiairways.com

In this regard, this Anti-Fraud and Corruption Policy shall be applied in the Company's operations. The Executive Management Meeting is assigned the authority and responsibility to consider, review, and approve relevant guidelines, criteria, or other orders to ensure that the Company's operations are consistent with the Anti-Fraud and Corruption Policy.

This Policy shall be effective from this date onwards.

Bangkok, August 28, 2026

THAI AIRWAYS INTERNATIONAL

PUBLIC COMPANY LIMITED

Mr. Lavaron Sangsnit

Chairman of the Board

Corporate Compliance Department

Tel: 02-545-3566