

## **SABINA PUBLIC COMPANY LIMITED AND SUBSIDIARIES**

# **Internal Control Policy**

**Revised Edition, October 2025**

## **SABINA PUBLIC COMPANY LIMITED AND SUBSIDIARIES** **Internal Control Policy**

Sabina Public Company Limited and its subsidiaries have realized the importance of having an internal control system, which is considered an important basis for successful business operations and stable and sustainable growth. To build confidence among stakeholders in all sectors that the Company's operations will meet its objectives and goals while ensuring good corporate governance, the Board of Directors has established effective, sufficient, and appropriate internal control and internal audit systems tailored to the nature of the work and activities involved. The Board of Directors has therefore assigned the Audit Committee to supervise and review the internal control system to ensure the Company's efficient and effective operating system, reliable financial reports and operating reports, and compliance with the relevant laws, rules, regulations, and policies to prevent or reduce risks that may occur.

The Company provides an independent internal auditor and reports directly to the Audit Committee to help the Audit Committee and the Board of Directors ensure that the core and important activities and other activities of the Company have been carried out in accordance with the established internal control system effectively with sufficient conciseness.

The Board of Directors conducts an annual assessment of the adequacy of the internal control system by examining the documents from the management, including the assessment of the adequacy of the internal control system prepared by the Audit Committee and the management from the assessment of the internal control system of the Company and its subsidiaries in various fields, including organization and environment, risk management, operational control of the management, information and communication systems, and monitoring systems.

### **Governance Structure Based on the Internal Control System**

The Company has established a governance structure based on the principles of the Three Lines of Defense, which defines the roles and responsibilities of internal departments in order to achieve clarity, transparency, and verifiability in accordance with the framework of internal supervision and control, which is divided into three levels:

1. The First Line of Defense (1st) is an entity in which operators are responsible for supervising their work according to the established rules/systems by supervising compliance with the rules, internal controls, and risk management appropriately, and reporting their performance.

2. The Second Line of Defense (2nd) is the management or an entity that is responsible for setting policies, rules, and standards, including supervising the work of various departments, as well as providing advice, transferring important knowledge and skills necessary for operation, and communicating about policies, rules, and standards as prescribed or changed.

3. The Third Line of Defense (3rd) is the Internal Audit Office, which is an independent entity that reports directly to the Audit Committee and reports on the management to the Chief Executive Officer (CEO). The Internal Audit Office is responsible for reviewing the work processes of various departments at both the 1st and 2nd levels to ensure that they are in accordance with the prescribed requirements and are efficient and effective.

## Internal Control Policy Guidelines

To provide internal control and internal audit covering all aspects, the Company has implemented the Internal Control Guidelines of the Committee of Sponsoring Organization of the Treadway Commission (COSO) – Internal Control Integrated Framework, which is an internationally standardized internal control guideline. The policy guidelines consist of five elements as follows:

### 1. Control Environment

- 1.1 The organization adheres to the principles of integrity and ethics** – Formulation of policies and guidelines for the Company's ethics and code of conduct to ensure that the Board of Directors, executives, and employees at all levels, as well as related parties, behave correctly and appropriately.
- 1.2 The Board of Directors is directly responsible for supervision** – The Board of Directors has clearly defined the Company's strategy, goals, directions, and business plans, as well as corporate governance to ensure that the goals are met. This includes the formulation of policies, regulations, and rules of the Company to serve as principles and guidelines for operations, as well as preventing damage or omissions in operations.
- 1.3 The Board of Directors and the management have clear command powers** – Organizational structure, division of command lines, and clear division of responsibilities in the work, as well as a check and balance of powers.
- 1.4 The organization develops, retains, and motivates employees** – The Company is committed to motivating, developing, and retaining talented employees. The Company provides an annual training plan and a personal development plan for each position to develop the knowledge and competencies necessary to perform their core duties, missions, and responsibilities, or in changing circumstances, including knowledge, skills, and experience in risk management and internal control. In addition, a clear performance evaluation process and fair remuneration are established to motivate and retain employees.
- 1.5 The organization pushes all positions to be accountable for internal control** – The Company has designated the Board of Directors, executives, and employees at all levels to have duties and responsibilities for the performance of the internal control system to achieve the objectives of the organization.

### 2. Risk Assessment

- 2.1 Set clear goals** : The Company has clearly defined the internal control objectives of its operations in accordance with the organization's objectives, which are sufficient to identify and assess risks related to the objectives and risks at all levels, including corruption risks associated with the Company's business strategy.
- 2.2 Identify and analyze risks comprehensively** : The Company comprehensively identifies risk analysis and management methods of all types of risks that may affect the achievement of objectives, and manages risks that may arise from the nature of work or activities that may cause errors, damage, or failure of achievement of defined objectives. This ensures that internal controls can control vulnerabilities at risk to an acceptable level in accordance with good practices.

**2.3 Consider the possibility of corruption :** The Company has established control points in activities with risk factors to identify measures to prevent weaknesses in the work process or issues that are likely to be at risk of fraud and the impact of the risk, as well as to find the causes of risk factors to lead to the development and improvement of the work process.

**2.4 Identify and assess changes that may affect the internal control system :** The Company's internal audit focuses on risk-based audits, which involve assessing the risks of the work and selecting high-risk jobs to plan the audit, increasing the audit's effectiveness.

### 3. Control Activities

**3.1 Control risks to an acceptable level :** Require regular risk assessment and review with the Risk Committee to direct and control the operation.

**3.2 Develop a technological system used to control :** The Company has developed and prepared a plan to prevent and mitigate damage to core systems with preventive maintenance at regular intervals and preparations to respond to cyberattack threats.

**3.3 Control the implementation of policies :** Control activities are determined in accordance with the Company's objectives through various policies and procedures. The Board of Directors, executives, and employees at all levels participate in, acknowledge, and understand the objectives of the control activities set by the organization. This includes communication with operators about the risks that may arise in the performance of the objectives.

### 4. Information and Communication

**4.1 Relevant and quality information is available. :** The Company provides information to carefully carry out operations, which must be accurate, clear, easy to understand, and up-to-date.

**4.2 Information is communicated within the organization to ensure that internal control can continue. :** The Company provides communication between executives and employees, or between departments, to understand and coordinate operations by regularly arranging staff meetings.


**4.3 There is communication with external agencies on issues that may affect the control :** The Company communicates effectively with external stakeholders through appropriate communication channels based on the target groups consisting of customers, suppliers, shareholders, investors, regulatory authorities, communities, and society.

### 5. Monitoring Activities

**5.1 Monitor and evaluate internal controls :** The Company has designated the Internal Audit Office, which is an independent entity within the Company, to review, audit, and monitor compliance with the internal control system to ensure that risk prevention is fully carried out in accordance with the internal control process. The results of the review and audit will be reported directly to the Audit Committee.

- 5.2 Evaluate and communicate internal control deficiencies in a timely and appropriate manner. :** In the internal audit process, internal control deficiencies are evaluated and immediately communicated to the department management. They must make adjustments or corrections to such deficiencies in a timely manner and report directly to the Audit Committee for acknowledgment.

This Internal Control Policy has been approved by the Audit Committee Meeting No. 3/2025 on August 14, 2025 and approved by the Board of Directors' Meeting No. 4/2025 on October 20, 2025.



(Miss Duangdao Mahanavanont)  
Chief Executive Officer