



## JUMP+ Plan

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MGC → ASIA

**Millennium Group Corporation (Asia) Public Company Limited**

**(MGC)**

Year 2026 - 2028

This report was approved by the board of directors on 18/12/2025  
and disseminated on 31/03/2026

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SET  
Industrials / Automotive

CG Report :

SET ESG Ratings: **A**

Anti-Corruption Certification (CAC): **Yes**

## Business Type

The Company is a holding company which engages in a fully integrated automotive business, whereby the business of the group consists of 1) automotive sales business 2) after sales and independent car maintenance service business 3) car rental and driver service business and 4) information and technology (IT) service, shared service, financial services for automobiles, insurance brokerage and car detailing service business

Financial Statement				
Year	2025	2024	2023	2022
<b>Income Statement (MB)</b>				
Revenues	22,477.16	20,333.72	25,132.69	23,076.20
Expenses	21,370.92	19,806.93	24,415.63	22,171.67
Net Profit	1,283.88	145.70	269.84	603.50
<b>Balance Sheet (MB)</b>				
Assets	19,038.54	15,188.57	15,442.10	12,328.19
Liabilities	13,883.57	11,437.51	11,724.21	11,049.90
Shareholders' Equity	5,149.42	3,745.76	3,712.66	1,273.68
<b>Cash Flow (MB)</b>				
Operating	3,429.81	3,099.51	3,506.45	3,228.44
Investing	243.86	-261.37	-798.00	-472.02
Financing	-3,244.25	-2,567.63	-2,364.95	-2,745.23
<b>Financial Ratio</b>				
EPS (Baht)	1.15	0.13	0.26	0.76
GP Margin (%)	12.99	9.50	9.20	10.06
NP Margin (%)	5.71	0.72	1.07	2.58
D/E Ratio (Times)	2.69	3.05	3.15	8.64
ROE (%)	28.87	3.91	10.82	47.38
ROA (%)	11.18	4.03	5.19	7.39

## JUMP+ Plan

### Business Plan

#### Target in 2028

Core Profit	<b>1,250-1,350</b> Million Baht
Revenue	<b>32,500-40,000</b> Million Baht

Strategic Plan	Growth	Profitability & Efficiency	Stability
1. Strategic Plan 1 : Oracle Netsuite ERP Implementation	✓	✓	✓
2. Strategic Plan 2 : Mobilife Loyalty Program	✓	✓	

### Governance Plan

1. Enhancing anti-corruption and fraud prevention efforts
2. Enhancing whistleblowing mechanisms
3. Enhancing the prevention of insider information

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**Section 1**  
**Business Plan**

# Section 1 Business Plan

## Target in 2028

Topic	YE/2023	YE/2024	YE/2025	Target in 2028
Core Profit (Million Baht)	270.00	146.00	683.00	<b>1,250-1,350</b>
Revenue (Million Baht)	25,133	20,334	22,477	<b>32,500-40,000</b>

### Driving Efficiency, Accelerating Growth

The 3-year corporate strategic plan, under the concept of "Driving Efficiency, Accelerating Growth," aims to foster sustainable growth while simultaneously enhancing the company's operational efficiency and financial stability.

The company will build upon and expand its strengths from its integrated automotive business across 3 main segments: Retail/Wholesale, Aftersales, and Car Rental, as well as other businesses, through 2 key strategic plans: the implementation of the Oracle NetSuite ERP system to elevate operational processes across the entire group of companies, and the development of the Mobilife Loyalty Program into a new system that fully covers the Mobility Ecosystem.

Regarding efficiency, the company will implement Oracle NetSuite ERP as the organization's single source of truth to control employee-related expenses, enhance the quality of financial data, and improve the cash flow management of the group of companies, thereby reducing reliance on external loans and unnecessary interest burdens.

Regarding growth, the company will develop Mobilife on the Primo platform to connect customers with every touchpoint in the MGC-Asia Mobility Ecosystem, from new car purchases, aftersales services, car rentals, and insurance, to financial services. The goal is to expand its member base, driven by insights and AI personalization, to create a seamless customer journey covering every touchpoint in the Mobility Lifecycle.

All strategies will be driven by financial discipline, efficient capital management, and data-driven decision-making to create sustainable value for shareholders, customers, and stakeholders in the long term.

This plan will promote and develop the organization across 3 dimensions: Growth, Profitability & Efficiency, and Financial Stability.

The implementation of the Oracle NetSuite ERP system to enhance operational efficiency will demonstrate the company's financial targets (net profit for 2028) through the following mechanisms:

1. Control of Employee-Related Expenses: Employee expenses for the group of companies will be reduced from the original 3.7% of total revenue to 2.6% by 2028.
2. Inventory Management: Inventory days will be reduced to 45 - 55 days by 2028.
3. Cash Management: The Cash Conversion Cycle will be reduced to 20 days by 2028.
4. Financial Cost to Total Revenue Ratio: from the original 1.9% to 1.1% by 2028.

Regarding growth, the company will develop Mobilife on the Primo platform to connect customers with every touchpoint in the MGC - Asia Mobility Ecosystem, from new car purchases, aftersales services, car rentals, and insurance, to financial services. The goal is to expand its member base, driven by insights and AI personalization, to create a seamless customer journey covering every touchpoint in the Mobility Lifecycle.

**Growth plan/Increase business value**

**Strategic Plan 1 : Oracle Netsuite ERP Implementation**

- Core argument: Driving growth through both revenue expansion and operational efficiency simultaneously, via 3 key mechanisms:
  - Employee Productivity: automate back-office work so the same headcount handles higher transaction volumes
  - Stock Management: free up capital trapped in excess inventory
  - Cash Management: reduce reliance on external working capital loans and lower finance cost ratio

All three mechanisms are enabled by Oracle NetSuite ERP, which consolidates data from every BU into a single source of truth. This gives top management real-time visibility into operational performance, cost structures, and cash flow - eliminating reliance on month-end reports and empowering faster, more informed strategic decision-making across the Group.

• Employee Productivity

ERP impact: Automates journal entries, AP matching, and reconciliation

Target: Reduce ratio to 2.6%

• Stock Management

ERP impact: Real-time visibility across all branches, demand forecasting and auto reorder

Target: Reduce inventory day to 45 - 55 days; turnover 6.6 - 8.1 times

• Cash Management

ERP impact: Real-time cash dashboard, reduce reliance on external working capital loans.

Target: Cash conversion cycle 26.9 > 20 days, finance cost ratio per revenue from 1.9% to 1.1%

**This plan will promote and develop the organization in the following dimensions**

- Growth
- Profitability & Efficiency
- Stability

**Targets**

• Corporate Financial Targets

Topic	Latest data		Targets		
	YE/2024	YE/2025	2026	2027	2028
Net Profit : Owners Of The Parent (MILLION BAHT)	145.70	1,283.88	900-1,000	1,150-1,250	1,250-1,350

**Strategic Initiative**

Strategic Initiative	Year	Expected Outcomes
Three-phase ERP rollout with specific companies, budgets, and activity timelines. • 2026 - Phase 1 (฿33.2M) 5 pilot companies: NMA, XTH, XMP, ZMP, I24 Steps: requirements > design > data cleansing > integration > UAT & training - go-live ERP implementer fee: ฿17.5M (largest cost item) • 2027 - Phase 2 (฿27.0M) 10 additional companies: MGC, MAG, SHA, MCR, MDS, MAC, USM, GW,	2026	<ul style="list-style-type: none"> <li>• Employee Productivity: Employee expense per revenue 3.15%</li> <li>• Inventory Management: inventory 65 days, turnover 5.6 times</li> <li>• Finance cost per revenue: ratio falls to 1.4%</li> </ul>
	2027	<ul style="list-style-type: none"> <li>• Employee Productivity: Employee expense per revenue 2.78%</li> </ul>

Strategic Initiative	Year	Expected Outcomes
AZM, MMS • 2028 - Optimization (฿19.5M) No new installation - maximize value from existing system: Automate repetitive tasks, build real-time dashboards & KPIs, standardize data entry	2028	<ul style="list-style-type: none"> <li>• Inventory Management: inventory days 60 days, turnover &gt; 6.0 times</li> <li>• Finance cost per revenue: ratio falls to 1.2%</li> <li>• Employee Productivity: Employee expense per revenue 2.55%</li> <li>• Inventory Management: inventory days &gt; 45-55 days, turnover &gt; 6.6-8.1 times</li> <li>• Finance cost per revenue: ratio falls to 1.1%</li> </ul>

**Risk Management**

**Risk 1 : Oracle NetSuite ERP implementation fail**

• **Risk Characteristic**

The ERP implementation carries four key risk areas that require proactive management: system integration complexity across multiple legacy platforms, employee resistance and low adoption rates, data quality issues arising from consolidating disparate systems, and the likelihood of budget overruns due to scope creep. These risks are interconnected - unmanaged, they could delay the project, reduce ROI, and undermine investor confidence. However, the company has prepared concrete mitigation plans for each, including engaging an experienced Oracle Automotive partner, conducting pre-migration data cleansing, implementing a company-wide Change Management Programme, and securing a fixed-price contract with a 15% contingency reserve.

• **Risk Impact**

- Risk 1: Implementation Complexity & System Integration

Risk: Delays, cost overruns, difficulty integrating with DMS and legacy systems

- Risk 2: Change Management & Employee Adoption

Risk: Resistance to new workflows; low adoption undermines ERP's full value

- Risk 3: Data Migration Quality

Risk: Incomplete/duplicate/incorrectly formatted records cause post-go-live reporting errors

- Risk 4: Budget Overrun

Risk: ERP projects commonly exceed budget by 20–30% due to scope expansion

• **Risk Management Measures**

- Risk 1: Implementation Complexity & System Integration

Risk: Delays, cost overruns, difficulty integrating with DMS and legacy systems

Mitigation: Select automotive-experienced Oracle implementer; run UAT early; prepare fallback plan

- Risk 2: Change Management & Employee Adoption

Risk: Resistance to new workflows; low adoption undermines ERP's full value

Mitigation: Company-wide Change Management Program; appoint BU Super Users; KPI ≥80% adoption in Year 1

- Risk 3: Data Migration Quality

Risk: Incomplete/duplicate/incorrectly formatted records cause post-go-live reporting errors

Mitigation: Dedicated data cleansing before migration; 3-month parallel run; Data Governance Policy

- Risk 4: Budget Overrun

Risk: ERP projects commonly exceed budget by 20–30% due to scope creep

Mitigation: Fixed-price contract; monthly Steering Committee budget reviews; 15% contingency reserve

## Strategic Plan 2 : Mobilife Loyalty Program

MGC-Asia's Mobilife loyalty program connecting all businesses

- Current Status (2025): 70,000 members, 60,200 active members

Sales via Loyalty 9,851 MB, 229.6 million points accumulated, 113,191 transactions

Top-performing BUs: BMW New Car 4,464 MB, Summit Honda 1,417 MB

- Target for 2028: Revenue 32,500-40,000 MB

- Membership Tiers: Diamond 70% | Black 15% | Infinite Blue 5%

- Strategic Value:

- Retaining existing customers is cheaper than acquiring new ones.
- Create Cross-sell: New Car > Aftersales > Insurance > Car Rental
- Customer behavior data for Personalized Offers and demand forecasting
- Increase Customer Lifetime Value across all BUs

### This plan will promote and develop the organization in the following dimensions

- Growth
- Profitability & Efficiency

### Targets

- Corporate Financial Targets

Topic	Latest data		Targets		
	YE/2024	YE/2025	2026	2027	2028
Total Revenues (MILLION BAHT)	20,333.72	22,477.16	25,000	30,000	32,500-40,000

**Strategic Initiative**

Strategic Initiative	Year	Expected Outcomes
<ul style="list-style-type: none"> <li>Year 2026 - Platform Migration and Foundation Laying (Budget 5.8 MB) Q1: Primo Installation Kick-off (Comarch contract ends July 2026) Q2: E-Cash Voucher Issuance, Comarch Data Migration, UAT Testing for all BUs Q3: Primo Go-live (July) with full replacement of Comarch, XPENG Point Accumulation, Mission Campaign Q4: Point Transfer Feature, Mobile OTP (no 13-digit code required), LINE/Google Login</li> <li>Year 2027 - Increased Engagement and Data Intelligence (Budget 7.9 MB) Cross-sell Alerts, Personalized Campaign (Behavior Tags), External Partner Integration Analytics Dashboard, Gamification for all BUs</li> <li>Year 2028 - Integrated System Connection and AI Personalization (Budget 7.9 MB) Full Primo Analytics, CLV Measurement for all BUs, Data Integration with ERP Oracle Netsuite Present ROI to the Board</li> </ul>	2026	<ul style="list-style-type: none"> <li>Total revenue 25,000 million Baht</li> </ul>
	2027	<ul style="list-style-type: none"> <li>Total revenue of 30,000 million Baht</li> </ul>
	2028	<ul style="list-style-type: none"> <li>Total revenue 32,500-40,000 million Baht</li> </ul>

**Risk Management**

**Risk 1 :** Risk of transitioning the Mobilife system to a new platform

**Risk Characteristic**

The transition of the Mobilife platform to a new system involves four key risk areas that require structured management. These encompass data migration risk - where member records, point balances, redemption history, and tier status may be incomplete or inaccurate post-migration - as well as service continuity risk arising from potential downtime during the parallel run period that may temporarily disrupt members' ability to earn or redeem points. Additionally, project and budget risk may emerge if scope boundaries are insufficiently defined, leading to Go-Live delays or cost overruns beyond the approved budget. Finally, data governance and internal control risk poses a threat to the accuracy and completeness of CRM data, with potential implications for compliance and internal audit processes. Collectively, these risks are interconnected, and if left unmitigated, could undermine member trust, corporate reputation, and the long-term success of the Mobilife programme.

**Risk Impact**

Risk 1: Data Migration Risk (System Transition to New MOBILIFE Platform) Risk Description: During the transition from the existing system to the new MOBILIFE platform, there is a risk associated with data migration. Member data, loyalty points, redemption history, and membership tiers may be incomplete or inaccurate after migration.

Potential Impact:

- Incorrect member points or status
- Loss of customer trust and potential complaints
- Negative impact on corporate image

Risk 2: Service Continuity Risk Risk Description: During the system transition phase, downtime or service disruption may occur, particularly during the parallel run between legacy and new systems. This may prevent customers from earning or redeeming points as usual.

Potential Impact:

- Temporary inability for customers to accumulate or redeem points
- Disruption to customer experience

Risk 3: Project & Budget Risk Risk Description: The development of the new platform requires coordination with vendors and integration across multiple systems. If project scope is unclear, this may lead to delays, budget overruns, or misalignment with business requirements. Potential Impact:

- Delay in Go-Live timeline
- Project costs exceeding approved budget
- System not meeting business expectations

Risk 4: Data Governance & Internal Control Risk Risk Description: The new platform must support proper access control, data recording, and data modification processes. Weak governance structure or internal controls may affect data accuracy, completeness, and reliability. Potential Impact:

- Compliance and internal audit risks
- Reduced reliability of CRM and customer data

• **Risk Management Measures**

1. Data Migration Risk

- Develop a comprehensive Data Migration Plan covering member data, points, redemption history, and tiers
- Conduct multiple rounds of test migration to ensure data accuracy and completeness before Go-Live
- Implement data backup and rollback plans in case of post-Go-Live issues

2. Service Continuity Risk

- Implement a phased transition and/or parallel run strategy
- Schedule system transition during appropriate periods and communicate in advance to customers and stakeholders
- Prepare contingency measures such as post-adjustment mechanisms for points or transactions

3. Project & Budget Risk

- Clearly define project scope, timeline, and budget from the outset
- Monitor project progress and expenses against approved budget regularly
- Provide regular status reports (timeline / cost / risk) to management for timely decision-making

4. Data Governance & Internal Control Risk

- Establish a clear Data Governance framework, including roles, responsibilities, and access rights
- Implement strong internal controls such as:
  - Segregation of Duties
  - Audit trails
  - Change logs
- Conduct testing and review of controls with relevant departments to ensure audit readiness and compliance

## Section 2

### Governance Plan

## Section 2 Governance Plan

### Accountability and Transparency Governance

#### Enhancing anti-corruption and fraud prevention efforts

Millennium Group Corporation (Asia) Public Company Limited (“the Company” or “MGC-ASIA”) is committed to elevating its anti-fraud and anti-corruption framework into a “One Group, One System” approach across the Group, covering all business units and subsidiaries. This will be achieved by integrating clear, practical, and enforceable policies and guidelines into key business processes, while establishing well-defined roles, oversight mechanisms, and accountability. The objective is to embed fraud prevention as an integral part of the Company’s corporate culture and business decision-making. To this end, the Company will adopt a proactive approach through the conduct of Fraud and Bribery Risk Assessments, the review of traceable internal control measures, and the provision of role-based training and communication.

The Company will also strengthen oversight of third parties and business partners through third-party integrity measures in order to mitigate fraud and corruption risks across the supply chain. In addition, the Company will continuously monitor the effectiveness of these measures through key performance indicators and reviews by the Internal Audit function, with regular reporting to the relevant committees. This is intended to uphold the corporate governance standards expected of a listed company and to strengthen, on a sustainable basis, the confidence of investors and other stakeholders.

#### Targets

Topic	Current Status	Targets		
		2026	2027	2028
The company has established an anti-corruption policy and practices.	Complete	-	-	-
<ul style="list-style-type: none"> <li>An anti-corruption and anti-bribery policy has been developed to comprehensively cover the organization's business operations, formally approved by the Board of Directors, and supported by clear and practical implementation guidelines</li> </ul>	Complete	-	-	-
<ul style="list-style-type: none"> <li>The company conducts regular monitoring and evaluation of compliance with its anti-corruption and anti-bribery policy and procedures. Audit results are reported by internal auditors to the Board of Directors at least annually. In the event of any violations, corrective actions and preventive measures are clearly defined to prevent recurrence</li> </ul>	Complete	-	-	-
<ul style="list-style-type: none"> <li>The company conducts an annual review of its anti-corruption and anti-bribery policy and practices with the Board of Directors</li> </ul>	Complete	-	-	-
Achieve CAC certification from the Thai Institute of Directors (Thai IOD)	Certified	-	-	-
Enhance anti-bribery and anti-corruption governance to cover outsourced personnel.	-	On process	On process	Success

## Strategic Initiative

Strategic Initiative	Year	Expected Outcomes
<p>The Company has consistently provided anti-bribery and anti-corruption training, in line with CAC guidelines, to its directors, executives, and employees on a regular and ongoing basis. Building on this foundation, the Company has established a plan to further enhance anti-corruption awareness among outsourced personnel, specifically housekeeping and security staff, at both the head office and branch locations. The plan includes training in accordance with CAC guidelines and the Company's policies, formal acknowledgment of the Code of Conduct and relevant guidelines, and continuous monitoring of implementation throughout 2026–2028. This is intended to ensure broader and more comprehensive policy communication across the organization and to reinforce good corporate governance in a tangible manner.</p>	2026	<ul style="list-style-type: none"> <li>• Develop an Anti-Corruption training program for outsourced personnel.</li> <li>• Conduct training in accordance with CAC guidelines and the Company's policies for no less than 30% of outsourced personnel across the head office and branch locations.</li> <li>• Obtain signed acknowledgment of the Code of Conduct and relevant compliance guidelines from outsourced personnel.</li> </ul>
	2027	<ul style="list-style-type: none"> <li>• Conduct training in accordance with CAC guidelines and the Company's policies for no less than 45% of outsourced personnel across the head office and branch locations.</li> </ul>
	2028	<ul style="list-style-type: none"> <li>• Conduct training in accordance with CAC guidelines and the Company's policies for no less than 60% of outsourced personnel across the head office and branch locations.</li> </ul>

## Risk Management

**Risk 1 :** The risk that outsourced personnel may not yet have sufficient understanding of, or formally acknowledged, the Company's anti-corruption policies may adversely affect the Company's corporate governance framework and organizational reputation. The Company therefore intends to implement measures during 2026–2028, including training in line with CAC guidelines, formal acknowledgment of the Code of Conduct, incorporation of compliance requirements into contractual arrangements, and continuous monitoring and evaluation.

### • Risk Characteristic

Outsourced personnel, including housekeeping and security staff working at the Company's head office and branch locations, may not yet have been adequately informed of, or developed sufficient understanding of, the Company's anti-bribery and anti-corruption policies and related guidelines. This includes matters such as the offering or acceptance of improper benefits, inappropriate facilitation payments, or failure to report incidents that may be indicative of corrupt conduct. As such personnel are not directly employed by the Company, the Company's ability to oversee, control, and monitor compliance may be limited unless clear and systematic measures are established.

### • Risk Impact

- Reputational and corporate image risk
- Corporate governance risk
- Risk of non-alignment with CAC guidelines and good corporate governance principles
- Risk of diminished stakeholder confidence

### • Risk Management Measures

1. Preventive Controls
  - 1.1. Provide anti-corruption training for outsourced personnel in line with CAC guidelines and the Company's policies, with the format tailored to their job functions and level of understanding.
  - 1.2. Require outsourced personnel to sign an acknowledgment of the Company's Code of Conduct and anti-corruption guidelines prior to commencing work, and to renew such acknowledgment periodically.
  - 1.3. Integrate anti-corruption requirements into service agreements with outsourced service providers.

2. Detective Controls
  - 2.1. Establish accessible whistleblowing and complaint channels for outsourced personnel, together with whistleblower protection measures.
  - 2.2. Continuously monitor and evaluate training participation and policy acknowledgment throughout the period 2026–2028.
  - 2.3. Report implementation results to the compliance function or the responsible committee on a regular basis.
3. Corrective & Improvement Measures
  - 3.1. Regularly review and improve the approach to communicating policies so that it remains appropriate for outsourced personnel.
  - 3.2. Use monitoring results and feedback to improve the training program and governance process.
  - 3.3. Report implementation results and risk issues to management or the relevant committee at least once a year in order to support systematic oversight, follow-up, and continuous improvement.

### Enhancing whistleblowing mechanisms

The Company intends to strengthen its whistleblowing system so that it becomes clearer, more transparent, more accessible, more secure, and more auditable. The plan focuses on establishing a systematic end-to-end process covering complaint intake, complaint screening, preliminary assessment, consideration of entry into the formal investigation process, appointment of responsible persons or an investigation committee, fact-finding, case conclusion, determination of corrective actions, and appropriate protection measures for whistleblowers and related parties.

This plan is intended to build confidence among employees, business partners, and all stakeholder groups that the Company maintains fair, confidential, and timely whistleblowing channels and procedures. It further aims to embed complaint management as an integral part of the Company’s good corporate governance, internal control, and enterprise risk management framework on a continuous basis.

#### Targets

Topic	Current Status	Targets		
		2026	2027	2028
The company has established a whistleblowing policy and procedures for reporting misconduct.	Complete	-	-	-
• The company has established a formal, written whistleblowing policy and procedures, which have been approved by the Board of Directors	Complete	-	-	-
• Appointment of an impartial recipient for whistleblowing reports.	Complete	-	-	-
• All complaints are thoroughly investigated, and outcomes are reported to the Board in a timely manner, with appropriate corrective and preventive actions in cases of confirmed misconduct to avoid recurrence.	Complete	-	-	-
• The whistleblowing policy and procedures reviewed by the Board of Directors at least annually.	Complete	-	-	-

Topic	Current Status	Targets		
		2026	2027	2028
Develop, formalize, and implement written procedures for whistleblowing and case review/investigation.	-	On Process	On Process	Complete

### Strategic Initiative

Strategic Initiative	Year	Expected Outcomes
Establish clear whistleblowing procedures and a formalized process for case review and investigation.	2026	<ul style="list-style-type: none"> <li>The Company has a clearly documented whistleblowing and investigation consideration process covering case intake, screening, escalation for investigation, appointment of responsible persons or investigation committee, case conclusion, and corrective action follow-up.</li> </ul>
	2027	<ul style="list-style-type: none"> <li>The Company is able to implement the whistleblowing and investigation consideration process consistently across the organization, with relevant parties understanding their roles and complaint cases being tracked systematically.</li> </ul>
	2028	<ul style="list-style-type: none"> <li>The Company is able to continuously review and improve the effectiveness of its whistleblowing and investigation system by applying key findings to strengthen internal controls, risk management, and prevent recurrence.</li> </ul>

### Risk Management

**Risk 1 :** The whistleblowing system has not been utilized effectively.

#### • Risk Characteristic

Although the Company has established whistleblowing channels and a formal whistleblowing policy, certain groups of employees, business partners, and stakeholders may still have limited understanding of the reporting procedures, lack confidence in the confidentiality and safety of the process, or have concerns about possible identity disclosure or retaliatory actions. As a result, potential misconduct may go unreported, as such persons may be unwilling to use the available whistleblowing channels.

#### • Risk Impact

1. Reports received may not adequately reflect the actual issues or risks arising within the organization.
2. The Company's governance and internal control mechanisms may not be able to prevent or address issues on a timely basis.
3. Stakeholder confidence in the Company's corporate governance framework may be adversely affected.

#### • Risk Management Measures

The risk that stakeholders may still lack confidence in, or sufficient understanding of, the whistleblowing system, together with non-standardized complaint handling and investigation procedures, may reduce the practical effectiveness of the Company's governance framework. The Company therefore seeks to implement systematic measures to improve its policies, procedures, and follow-up mechanisms in order to strengthen the efficiency and credibility of the whistleblowing system.

**Risk 2 :** The complaint intake and investigation process lacks a standardized framework.

- **Risk Characteristic**

If the procedures for complaint intake, screening, review, and investigation are not supported by clearly defined timelines and roles and responsibilities, case handling may become inconsistent, lack standardization, and be difficult to audit retrospectively.

- **Risk Impact**

1. Complaint handling may be delayed and may not be conducted in a fair and consistent manner.
2. The Company may be exposed to legal and reputational risks.
3. Stakeholder confidence in the Company's corporate governance process may be adversely affected.

- **Risk Management Measures**

1. Preventive Controls
  - 1.1. Develop written procedures that are aligned with the Company's whistleblowing policy and guidelines, covering all stages from complaint intake to case conclusion and the determination of corrective actions.
  - 1.2. Clearly define the roles, duties, and responsibilities of complaint recipients, reviewers, and investigation committee members.
  - 1.3. Communicate whistleblowing channels, confidentiality measures, and whistleblower protection measures to employees, business partners, and stakeholders in a thorough manner.
2. Detective Controls
  - 2.1. Establish clear timelines for complaint intake, review, and investigation to ensure that complaints are handled in a timely manner and can be properly audited.
  - 2.2. Monitor and regularly report the status of complaints and case outcomes to management and relevant committees.
  - 2.3. Review the effectiveness of the whistleblowing system at least once a year to assess weaknesses and identify opportunities for improvement.
3. Corrective & Improvement Measures
  - 3.1. Analyze complaints received and case outcomes in order to improve the process and related procedures as appropriate.
  - 3.2. Enhance communication formats and awareness-building efforts to strengthen confidence in the use of whistleblowing channels.
  - 3.3. Continuously integrate the whistleblowing system with the Company's internal control and risk management systems.

## Enhancing the prevention of insider information

The Company seeks to enhance its governance system for material inside information that may affect the price of its securities and investors' decision-making by establishing a case-by-case process for identifying, registering, and designating persons involved with undisclosed material transactions or events. This approach will enable the Company to control access to inside information on a need-to-know basis, clearly impose confidentiality obligations and trading restrictions, and support accurate, fair, and timely disclosure to investors. In doing so, the Company aims to mitigate the risk of improper use of inside information, strengthen transparency, and further enhance its corporate governance standards.

**Targets**

Topic	Current Status	Targets		
		2026	2027	2028
The company has established a policy and procedures to prevent the misuse of insider information.	Complete	-	-	-
• A Board-approved written policy on insider information prevention has been clearly defined and implemented	Complete	-	-	-
• A structured process is implemented to regularly monitor and review compliance with the insider trading prevention policy,with audits conducted at least annually.	Complete	-	-	-
• The implementation of the insider information prevention policy is reviewed and reported to the Board of Directors at least annually. If any violations are detected,corrective actions and preventive measures are clearly outlined to prevent recurrence	Complete	-	-	-
Internally disclose,on a per-transaction basis,the list of individuals who have access to inside information regarding any transaction that may affect the company's stock price and investor decisions.	-	On process	On process	Completed

**Strategic Initiative**

Strategic Initiative	Year	Expected Outcomes
Establish a transaction-specific Insider List system for material transactions or events that may affect the price of the Company's securities. The system will set out trigger events, designated responsible persons, a standardized form, procedures for notification and acknowledgment by relevant persons, information access restriction measures, linkage with blackout period controls, and post-disclosure review procedures, with the aim of preventing insider trading and strengthening the transparency of the Company's disclosure practices.	2026	• Complete the Company's Insider List framework, process, and standardized forms, including clearly defined triggering events for opening an Insider List, and implement them in practice for all material transactions or events that meet the prescribed criteria.
	2027	• Expand implementation to cover group companies and operational executives involved in material transactions, and integrate the process with confidentiality obligations and acknowledgment of securities trading restrictions, so that insider information controls are applied more comprehensively throughout the transaction chain.
	2028	• Enhance the process through systematic monitoring and review, including completeness testing of Insider Lists for material transactions after deal closing or public disclosure, gap analysis, improvement of control measures, and summary reporting to the Board of Directors, in order to strengthen transparency and continuously reduce the risk of insider information misuse.

**Risk Management****Risk 1** : Risk resulting from insufficient control and governance over inside information**• Risk Characteristic**

Risk arising from inadequate control and governance of inside information may lead to insider trading and a lack of transparency in disclosure. The Company therefore establishes measures to implement an Insider List framework, including Trigger Event criteria, control procedures, linkage with the Blackout Period, and post-disclosure review, in order to strengthen governance and systematically reduce such risks.

If the Company does not yet have clearly defined Trigger Event criteria, a standardized organization-wide process for opening and closing Insider Lists, or a complete identification of persons involved with inside information, the control of information that may affect the price of the Company's securities may be insufficiently robust. This is particularly the case for significant transactions or events involving multiple business units, group companies, or external advisors.

**• Risk Impact**

- Insider Trading Risk
- Legal and regulatory compliance risk
- Damage to the Company's reputation and credibility
- Decline in investor and stakeholder confidence

**• Risk Management Measures**

- Establish standardized Insider List procedures and forms to be used consistently across the organization.
- Clearly define Trigger Events or categories of transactions/events that require the opening of an Insider List.
- Integrate the Insider List process with the Blackout Period and the Company's securities trading governance measures applicable to directors, executives, and related persons.
- Monitor, review, and verify the completeness of Insider Lists after disclosure or upon completion of the relevant transaction, in order to continuously improve control measures.

**Risk 2** : Inconsistent enforcement across the Group**• Risk Characteristic**

If the Insider List system is applied only at the parent company level or within certain business units, but does not yet cover group companies or operational executives involved in material transactions, control over inside information may lack continuity throughout the transaction chain.

**• Risk Impact**

- Control gaps in inside information management across group companies
- Group Governance Risk
- Inconsistent or unfair disclosure of information

**• Risk Management Measures**

Preventive Controls

- Establish and formally implement clear Trigger Event criteria specifying the circumstances in which an Insider List must be created.
- Develop a centralized Insider List template with a standardized data structure, including names of relevant persons, roles, and relevant time periods.

- Designate a responsible owner for opening, updating, and closing the Insider List for each transaction or event.
- Link the Insider List process with:
  - Confidentiality obligations
  - Acknowledgment of securities trading restrictions
  - The Blackout Period
- Establish measures to restrict access to information, documents, and information systems according to the sensitivity level of the information.

#### Detective Controls

- Require written acknowledgment by all persons included in the Insider List.
- Review the completeness of the Insider List during the transaction process, particularly when there are changes to relevant persons.
- Link Insider List information with the Company's disclosure control process.

#### Corrective & Improvement

- Measures Conduct a post-deal or post-disclosure review of the Insider List to confirm completeness and assess any control gaps.
  - Analyze incidents or cases involving identified risks and use the findings to improve Trigger Event criteria and control measures.
  - Prepare a summary report on Insider List implementation and related risk issues for submission to the Executive Committee or other relevant committee(s) at least annually.
  - Expand enforcement of the Insider List system to cover group companies and operational executives involved in material transactions.
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