

Data Governance Policy

To ensure that the Mitr Phol Group can manage data appropriately, efficiently and following the Cybersecurity Policy of the Mitr Phol Group, as well as the Personal Data Protection Policy of the Mitr Phol Group, the following data governance policy of the Mitr Phol Group has been established.

1. Objective

To support the operation of the Mitr Phol Group. In accordance with the principles of good corporate governance, it is necessary to implement Data Governance by establishing direction, principles, roles, and responsibilities of those involved in data management. To ensures that data-related operations are efficient, accurate, complete, up-to-date, secure, and maintain personal privacy. The data should be interoperable of high quality and can be processed for precise decision-making. It also prevents potential damage to the data that could result in harm to the company's business or infringe upon the rights and freedoms of the personal data subject.

This Data Governance Policy is applicable to all personnel of Mitr Phol, across all business units, including the directors, executive management and all employees of Mitr Phol Sugar Corporation and its subsidiaries, as well as contractors, business partners, and other stakeholders. In every work process, including personal data and non-personal data, that are in use and stored in the Mitr Phol Group's data sources, throughout the entire data lifecycle.

2. Definitions

- 2.1 Business Unit (BU) refers to the entity that owns and is responsible for managing the data.
- 2.2 **Data Set** refers to a collection of data gathered from multiple sources and stored together in a structured format.
- 2.3 **Metadata** refers to the description of a data set, including details about the data structure, content, properties, format, data sources, and access rights.



- 2.4 **Data Quality** refers to the measurement and evaluation of data readiness for use. Good data quality means that the data is accurate, complete, up-to-date, consistent, and relevant to the needs of the user.
- 2.5 Data Catalog refers to a list of Data Set that the Mitr Phol Group owns and manages, to facilitate the discovery of Data Set or Metadata.
- 2.6 Data Architecture refers to a blueprint for setting standards in data collection, storage, management, processing, analyzing, and presentation, to enable users to quickly access high-quality data.
- 2.7 Data Model refers to a structured design created to organize and describe the data framework, including the methods for storing data in the database, to understand the relationships and structure of the data.
- 2.8 Data Management refers to the processes of creating, collecting, storing, archiving, retention, destroying, processing, using, exchanging, linking, and disclosing data, following the concepts of the DAMA International Association (Henderson et al., 2017) for Data Management.
- 2.9 **Business Glossary** refers to the collection of terms related to business, providing definitions, examples of usage, relationships with other terms, and relevant information to facilitate collaboration and enhance data analysis efficiency.

3. Roles and Responsibilities

- 3.1 Data Governance Committee (DGC) has duties and responsibilities to define policy, guidelines, and procedure for Data Governance by appointing Digital Transformation and Cybersecurity Committee as Data Governance Committee.
- 3.2 **Data Owner** has duties and responsibilities to control their data quality and data governance. Identify Data Set, determining authorized data users and approving data usage, appointing, and updating the list of Data Stewards, and defining metrics to evaluate Data Quality.
- 3.3 **Data Steward** has duties and responsibilities to manage an organization's data, setting standards and criteria to control the quality of their own Data Set. Define and review Metadata and



- Business Glossaries, and coordinate with other departments to enable the business use of the data.
- 3.4 Data User has duties and responsibilities to utilize data in accordance with their access rights, both operational and managerial levels. Support data governance, report issues encountered during data usage regarding both quality and security.
- 3.5 **Data Compliance Team** has duty and responsibility to assess compliance with the data governance policy of the Mitr Phol Group by appointing IT Governance, Risk, and Compliance as Data Compliance Team.
- 3.6 **Data Architect** has duty and responsibility to design, create, monitor technological changes, and review the data architecture, IT infrastructure and data models of the organization.
- 3.7 Data Engineer has duty and responsibility to design the methods for storing and accessing data, manage all data to ensure comprehensive data linkage.
- 3.8 **Data Scientist** has duty and responsibility to gather data from various sources and transform, identify patterns and relationships, create models, and apply analytical techniques to predict new insights and solutions.

4. Principles of Practice

- 4.1 **Data Life Cycle Governance** The company has the procedures to ensure that data is governed throughout the data life cycle from creating, collecting, processing, using, storing, and destroying.
- 4.2 **Data Management** The company has procedures to ensure data management adopting the concepts of DAMA International (Henderson et al., 2017) to establish data management practices.
- 4.3 **Data Catalog Management** The company has procedures to ensure that data catalog management is conducted to centralize data within the Mitr Phol's system, allowing all departments to access shared data. This enables systematic cross-departmental data utilization.



5. Policy Review

- 5.1 Digital Transformation and Cybersecurity Committee will review Data Governance Policy annually and present it to the Board of Directors to ensure that the policy aligns with the current context of the Mitr Phol Group.
- 5.2 The company will develop a plan and procedure to improve Data Governance, Data Quality enhancement, conducting assessments to evaluate compliance with Data Governance Policy and reporting on the quality assessment of each Data Set at least once a year.

Chairman of the Board

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Mr. Buntoeng Vongkusolkit