



**SIAMRAJATHANEE**

PUBLIC COMPANY LIMITED

## Anti-Corruption Policy

Approved by the Board of Directors No. 4/2021

On August 11, 2021



Edit Note

Edit the time	Date of approval	Correction details	Reason for improvement	Approved by
00	September 26, 2017	Made for the first time.	-	BOD 3/2017
01	August 14, 2018	Update No.1/2018	-According to the principles of the SEC and SET	BOD 4/2018
02	June 19, 2019	Update No.1/2019	-Transform the company.	BOD 3/2019
03	August 11,2021	Update No.1/2021	- According to the principles of good corporate governance.	BOD 4/2021





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## Anti-Corruption Policy

Siamrajathanee Public Company Limited (the “Company”) realizes the importance of the good corporate governance principle by adhering to business operations with honesty, integrity, transparency, fairness, responsibility and careful under the laws, relevant regulations and standards.

Therefore, the Company is committed to the anti-corruption by not accepting any corruption and it also requires the Company, its subsidiaries including those involved in business operations to comply with the anti-corruption policy of which all relevant departments shall be complied with it by carrying out or taking any action with an emphasis on transparency and honesty in conducting business and communicating with government officers or regulatory agencies in order to avoid actions that may result in improper actions and conflict with the good management principle, including against bribery of government officers to facilitate or to give benefits for the Company's business and the maximum disciplinary action has been imposed on employees who commit such offences.

### Definition of Anti-Corruption Policy

Fraud or corruption means the use of positions, powers and duties acquired or misuse of existing assets for the benefit of itself, family, friends or any other benefits that are undue or cause damage to the interests of others such as bribing officials by soliciting, offering, giving or accepting bribes, promises of money or things or benefits or having conflicts of interest or concealment of facts or any other benefits which are contrary to morals and good ethics with government agencies or private agencies or persons having relevant duties whether directly or indirectly in order for such government agency or such person to act or refrain from performing duties that are accurate in accordance with the principle of practices unless otherwise the applicable laws, regulations, announcements, regulations, local customs or trade customs are permitted.





## Anti-Corruption Policy

Directors, executives and employees of the Company are prohibited from doing any act related to corruption in any form, directly or indirectly, including all relevant departments and the Company shall review the compliance with the anti-corruption policy including the review of practice guidelines and operational requirements to comply with the changes in business, regulations and legal requirements.

## Duties and Responsibilities

1. The Board of Directors is responsible for determining policies and procuring the establishment of an effective anti-corruption system to ensure that the management is aware of and prioritizes anti-corruption and the anti-corruption instilled into the corporate culture.
2. The Audit Committee is responsible for reviewing the financial and accounting reporting system, internal control system, internal audit system and risk management system to ensure that it complies with international standards, conciseness, appropriateness, up-to-date and efficient.
3. The Chairman of the Executive Committee, the Management Committee and the executives have a duty to establish a system and to promote and support the anti-corruption policy to communicate to employees and all related parties, including reviewing the appropriate systems and measures to be consistent with the change of business, regulations and legal requirements.
4. The Audit Department Manager is responsible for inspecting and reviewing the operation to ensure that it is in accordance with the policy, guidelines, authorization manual, code of conduct and laws and regulations and it shall ensure that there is an appropriate and adequate control system against potential corruption risks and to report to the Audit Committee.





## Practice Guidelines

1. The Company's directors, executives and employees at all levels shall comply with the anti-corruption policy and the Company's code of conduct without being involved in corruption, whether directly or indirectly.
2. The Employees shall not neglect or ignore when they find any actions that are considered as corruption related to the Company and they shall notify their supervisors or responsible persons and shall cooperate in the investigation of facts. If there are any questions or clarifications, he or she shall consult with his or her supervisor or a person designated to be responsible for monitoring of compliance with the Company's code of conduct through various channels as specified.
3. The Company will provide fairness and protection for employees who refuse or report corruption related to the Company by using measures to protect complainants or those who cooperate in reporting corruption according to the Company's policy
4. A person who commits corruption shall be deemed that such person has violated the Company's code of conduct which shall be considered disciplinary in accordance with the rules as determined by the Company. In addition, there may be legal penalties if such act is illegal.
5. The Company realizes the importance of disseminating knowledge and understanding to other people who have to perform duties related to the Company or may affect the Company in matters that shall be complied with the anti-corruption policy.
6. The Company is committed to creating and maintaining an organizational culture that adheres to the belief that corruption is unacceptable in both public and private transactions.





## Terms of Procedures

1. This anti-corruption policy shall include the human resources management process of recruitment or selection of personnel, promotion, training, evaluation of employee's performance and compensation by requiring the supervisors at all levels to communicate with their employees to acknowledge this policy to use in business activities that are under their responsibilities and the supervisors shall ensure that this policy is complied effectively.
2. Any actions in accordance with the anti-corruption policy shall apply the guidelines as set out in the business ethics, policies and guidelines towards various stakeholder groups, including the rules and operating manual of all related companies, as well as any other guidelines will be determined by the Company from time to time.
3. For clarity relating to the operations which may have a high risk of corruption, the Company's directors, executives and employees at all levels shall proceed with caution in the following matters:
  - 3.1 Entertainment gifts and expenses

The giving or receiving of entertainment gifts shall be in accordance with the Company's code of conduct.
  - 3.2 Donations or sponsorships

Giving or accepting donations or contributions shall be transparent and lawful, ensuring that donations or contributions are not used as an excuse for bribery.
  - 3.3 Business relationship and procurement with the government sector

Giving or receiving bribes is prohibited in all business operations of the Company and dealings with government sector shall be transparent, honest and shall be carried out in accordance with the relevant laws.





In order the operation of the Company in the same direction, the anti-corruption policy has been announced. This policy shall be effective on 11 August 2021.

Siamrajathanee Public Company Limited

Signed.....

(Mr. Weidt Nuchjalearn)

Chairman of the Board of Directors

