

## **Anti-Corruption Policy**

The Company conducts Internal Control Auditing to ascertain that the process for financial reporting is completely operated and appropriate according to the standard for internal auditing with adequate documents and evidence for auditing, and the auditing result is regularly submitted to the Company's Board of Directors on an annual basis.

### **1. Authority and Responsibility**

- 1.1 The Board of Directors has a duty to view and approve the Anti-Corruption Policy, and delegate the Management Team to implement the policy into practice.
- 1.2 The Audit Committee has a duty to re-examine the Company's Internal Control System Report, and assess the potential risk of corruption reported by the Internal Control. The Committee is to assure the Company that the system could minimize the corruption possibility, protect financial security and business operation, and is suitable for the Company's business model.
- 1.3 The Chief Executive Officer and the Management Team are responsible for policy implementation to a real practice by employees and involved sectors, through communication channels. They will also revise the Anti-Corruption Policy to accommodate the up-to-date business and legal changes, and then propose to the Committee.
- 1.4 The Internal Auditor has a duty to follow the Internal Audit Plan and submit the Internal Control System and Corruption Risk Assessment Report to the Audit Committee. The Auditor will also take care of the corruption investigation assigned by the Committee.
- 1.5 Every personnel of the Company has the duty of understanding and operating their work in accordance with the Anti-Corruption Policy as well as complying with the Company's related guidelines. In case there are queries or actions violating the Company's regulation, employees are required to report the matter to their supervisors or report through the Company's specified channels.

### **2. Policy and Guideline**

The Company possesses the internal audit to prevent the corruption in high-risk subjects that possibly cause corruption. The Company's Board of Directors, executives, employees, workers and representatives are required to strictly comply with the Anti-Corruption Policy by refraining from being involved with the corruption either directly or indirectly as follows:

### **2.1 Gift, Reception and Other Related Expenses**

In terms of gift presentation or reception, reception meal or other benefits with customers, trading parties, business representatives; the Company's personnel is required to avoid giving or receiving reception meals proven to be in excess of appropriation - except for gifts according to traditions or regular business reception or expenses in promotion of businesses related to the generation of commercial reputation as the exchange in relation to traditions. Should those gifts' prices are exceeding THB 3,000; employees are requested to immediately inform their supervisors of the department manager level and up.

### **2.2 Financial Support and Charity Donation**

Spending the Company's money or assets for charity donation or providing financial support is required to be conducted on behalf of the Company exclusively. Organizations for charity donation include foundations, educational institutions, charitable organizations, temples, hospitals, infirmaries or organizations for social benefits with verifiable evidences and operations through the Company's regulations.

### **2.3 Political Assistance**

The Company adheres to the political neutrality, the promotion of law compliance and democracy - with no direction in provision of political support for political parties, politicians or people involved with politics either directly or indirectly. The Company's Board of Directors, executives, employees and workers are required not to apply the Company's resources to support political activities or use for political parties' benefits or for the Company's business benefits related to political assistance.

The Company promotes the political freedom for its Board of Directors, executives, employees and workers to participate in or support political

activities legally. The Board of Directors, executives, employees and workers possess the rights to express, partake in and use political rights outside working hours with their own resources exclusively. They are requested to refrain from any action related to politics within the Company and from applying the Company's resources for those political operation.

## **2.4 Conflict of Interest**

The Company's Board of Directors, executives, employees and workers are requested to avoid actions with conflict of interest with the Company. Any action must be conducted with reasonable reasons on the basis of actions for the Company's benefit, without contradiction to related law and regulation. In this regard, should there be any action or behavior in the scope of having conflict of interest with the Company, the personnel has the duty to inform the conflict of interest through channels for whistleblowing regarding the corruption in accordance with the guideline specified in the Company's Code of Conduct Policy.

## **2.5 Facilitation payment**

The Company possesses the policy of no payment for facilitation to government officials in every case. Should the personnel be requested for the payment on behalf of the Company, should be cautious in the payment - with consideration of payment reasons and whether the amount of money is appropriate. Employees should request for receipts or documents with specific reasons for the payment. Should employees have any query, worry or question regarding the payment, they are requested to inform their supervisors in their chain of command.

## **2.6 Hiring Government Officials**

1. Procurement with government units, It is prohibited to give or receive bribes of every form. The procurement is requested to be conducted correctly - in compliance with rules, regulations, laws, criteria or traditions of each locality or each country - with different conditions, processes or practices. As a consequence, contacting government units must be conducted with transparency, honesty and in accordance with related laws.

2. Recruitment of former government officials is according the specific criteria by the Company - to avoid actions that may be compensation for any benefit. The selection, hiring approval and compensation determination for hiring former government officials to work as the Company's employees must be considered in accordance with necessities in relation to the recruitment process and the Company's specific criteria.
3. The Company requires that the data of names and biographies of former government officials that are appointed as the Company's directors and executives be revealed in its Annual Report for transparency.

## **2.7 Personnel Management**

1. The Company possesses Human Resources Management ranging from recruitment, personnel selection, promotion, training, employees' performance appraisal and compensation payment by determining that every level of supervisors communicate with employees regarding the policy and measure of anti-corruption - for application of business activities in their responsibility as well as efficient operation supervision.
2. The Company arranges the orientation process for new employees for their understanding of the guideline for anti-corruption, the Company's expectation and penalty should employees' operations be discordant with this the anti-corruption policy and measure.
3. The Company consistently provides communication and training for its directors, executives, employees and workers for true comprehension regarding the anti-corruption measure, the Company's expectation and penalty should employees' operations be discordant with this the anti-corruption policy and measure.
4. The Company provides appropriate and safe channels for employees in case they have questions, would like to ask for consultation or advices regarding the operation in accord with the anti-corruption measure.

5. The Company provides fairness and protection to its personnel -- with the principle of no demotion, no penalty nor negative impact on the Company's personnel that negates the corruption or informs any wrongdoings related to the Company -- even though those actions may cause the loss of its business opportunities. The Company arranges whistleblowing channels in accordance with the Policy and Guideline of Whistleblowing in addition to the measure for protection and confidentiality as the protection of complainants' rights and people providing the action data with good faith.

## **Risk Management**

The Company arranges that the internal audit assesses the risk regarding the corruption in the operation process by evaluating risks as the search for risk factors that may affect the operation, the analysis and the understanding the impact the risk has and the opportunity for the risk to occur, the consideration of the risk intensity level for finding the proper response in addition to the regular reviewing and assessment of the process and measure appropriateness to be in relation to business changes, rules and regulations according to the law on the annual basis.

## **Reviewing and Reporting**

The Company arranges that the internal audit has the duty of verifying the operation in compliance with the policy and guideline to strictly be in accordance with the requirement of the anti-corruption policy and reporting the verification result to the Auditing Committee for information and further consideration.

## **Training, Communication and Dissemination of the Policy for Internal Organization and External**

The Company will host training sessions for promotion of knowledge and correct understanding in terms of the overall of the corruption, the policy and guideline for anti-corruption risk management in organization at the present time for its employees - for further correct and proper application to their operation constantly through following activities:

- 1.1 The Company realizes the importance of the communication, dissemination, provision of knowledge and understanding for employees and external parties working in relation to the Company or may cause impacts with the Company as well as the public in terms of subjects that have to be in accord with this anti-corruption policy.
- 1.2 The Company arranges the communication of the information related to the anti-corruption policy and measure through its communication channels such as the Company's website, Email, Annual Report (One Report), brochures, circular letters, announcement on bulletin boards etc.
- 1.3 The Company hosts the orientation, training, seminar regarding the anti-corruption policy and measure for every employee – for information and operation.

### **Internal Control and Data Storage**

The Company provides the auditing process and the internal organization control system in support of the corporate governance culture in the organization, with systematic risk management and verification in addition to the prevention of the internal organization's corruption – to proof that those actions are not giving or receiving that may be channels for corruption. The process covers sales and marketing, product investment management, procurement and contract creation, finance, accounting, data recording, human resources management from hiring, determination of compensation, training for employees, disciplinary penalty as well as delegation of authority and clear and proper duties. The Company arranges independent internal auditors for assessing the internal controlling system, the risk management system and the corporate governance process of activities or working systems in terms of finance and data recording of accounting procedures in relation to the standard, the principle and the law applicable to accounting and financial reports. Every type of expenses needs attachment. The Company's data storage is required to be verifiable with efficiency in accord with the objective to ascertain that the compliance of the anti-corruption is according to the requirement and law or related supervising units. Furthermore, the Company's financial statements and performance results are regularly verified by permitted auditors on a quarterly and annual basis to ensure that the data, financial or accounting reports are correct, reliable, in time and in accordance with the law's requirement.

In this regard, the Audit Committee is responsible for supervising the internal organization for the Company, including the consideration of the financial report and other processes related to the anti-corruption measure.

### **Whistleblowing in relation to Anti-Corruption**

The Company provides channels for complaints and whistleblowing - covering the complaint reception, fact verification, summarization and reporting in addition to the protection of whistleblowers and related people to perceive complaints, opinions or suggestion from stakeholders affected or may be affected from the company's business operation or from the duty operation of directors, executives, employees and workers regarding illegal actions - including behaviors that may be related to corruption.

The Company issues the policy and guideline concerning whistleblowing and the measure for the protection of whistleblowers as specified in this Corporate Governance Policy.

### **Corruption Whistle Blowing**

When detecting or witnessing any form of actions indicating corruption or alleged wrongdoing which could affect the company directly or indirectly as a result, an individual shall not ignore or take no action, but shall inform the Audit Committee or the Chief Executive Officer immediately through the following channels:

- Secretary of Audit Committee by e-mail at [eakapong@scgjwd.com](mailto:eakapong@scgjwd.com)  
or Company Secretary by e-mail at [nattapume@scgjwd.com](mailto:nattapume@scgjwd.com)
- Director and Co- Chief Executive Officer by e-mails at [charvanin@scgjwd.com](mailto:charvanin@scgjwd.com)  
or [bunnk@scgjwd.com](mailto:bunnk@scgjwd.com)
- Company Public Relation email at [pr@scgjwd.com](mailto:pr@scgjwd.com)
- Corporate website at [www.scgjwd.com](http://www.scgjwd.com)

### **Investigation and Punishment Procedures**

- When getting informed about an indication of corruption possibility, the Audit Committee and/or the Chief Executive Officer will thoroughly study the information, and investigate the case by themselves, or delegate a representative (an Executive) to carry out the investigation.

- During the investigation period, the Audit Committee and/or the Chief Executive Officer will assign a delegate (an Executive) to report the investigation progress to the whistle blowers and the information providers.
- If the investigation concludes the corruption allegation is legitimate based upon the information or evidence, the Company will inform the alleged individual the accusation, and give him the right to defend himself by submitting any information or evidence to encounter the accusation and prove himself innocent.
- If all the evidence proves that he is guilty of corruption, his wrongdoing is considered to be against the Company's Anti-Corruption Policy and business ethics. Therefore, his punishment shall be according to the Company's regulations, and to the law if any illegal conduct is involved.

### **Confidentiality Protection**

In order to protect whistle blowers and information providers, all their personal information will be secure as absolute confidentiality. Only the authorize investigation personnel could have the information access permission.

The Audit Committee and/or the Chief Executive Office will have full authority to protect whistle blowers, complainants, witnesses, and information providers and assure them of their safety, trouble-free, and righteousness.

All the investigation team members shall treat all the information, complaints, and evidence given by the whistle blowers and the information providers as absolute confidentiality. Information disclosure shall be done only upon legal requests and regulations.

### **Reviewing of Anti-Corruption Policy**

The Company requires that the measure and policy for anti-corruption be reviewed annually or when there is a change affecting the operation significantly, to ascertain that the measure and policy is in accordance with the company's practices as well as other related requirements and laws.