


ANTI-CORRUPTION POLICY

This document is effective from March 1 , 2023 onwards.



Mr. Piboonsak Attaborwornpisarn

Chairman of the Audit Committee



Mr. Veerachai Suteerachai

Chairman of the Board

Introduction

Asia Metal Public Company Limited (“the Company”) is committed to conducting business with integrity and adhering to its responsibility to all stakeholders. The Company has joined "The Private Sector Collective Action Coalition Against Corruption" to express its intent and commitment against all forms of corruption. The Company has a policy that assigns responsibility, guidelines, and requirements for proper conduct to prevent corruption in all of its business activities. When making decisions, including business operations that may have risks of corruption, they are carefully considered and treated.

The Company has prepared an "Anti-Corruption Policy" in written form as a clear guideline for conducting business and developing into a sustainable organization. In this regard, the Company requires subsidiaries, associates, or other companies over which the Company has control (if any), business representatives, including persons involved in business operations, to strictly comply with the anti-corruption policy.

The board of directors and executives of Asia Metal Public Company Limited sincerely hope that this policy will be beneficial for operators and those involved, including those who are interested in applying for further work.

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Message from the Chairman: Anti-Corruption

Asia Metal Public Company Limited ("the Company") recognizes the importance of conducting business with honesty, transparency, and social responsibility, in accordance with the principles of good corporate governance. This includes adhering to the Code of Business Conduct and Ethics, and following the principles of fair business operations, management transparency, and accountability to stakeholders, as well as social and environmental responsibility.

The Company is committed to fostering an organizational culture that defines anti-corruption practices and policies, while providing appropriate best practices that align with the situation and laws of Thailand regarding anti-corruption. We hope to receive cooperation and support from all sectors in surveillance, supervision, and monitoring to keep the company free from corruption as intended.

To ensure that the Company has a defined policy with clear responsibilities, guidelines, and requirements for proper action, we aim to prevent corruption in all business activities. This means that business decisions and actions that may pose a risk of corruption are carefully considered and acted upon. As such, the Company has prepared an "anti-corruption policy in writing" to be a clear guideline for conducting business and developing into a sustainable organization.

Issued on March 1, 2023

Mr. Veerachai Suteerachai
Chairman of the Board

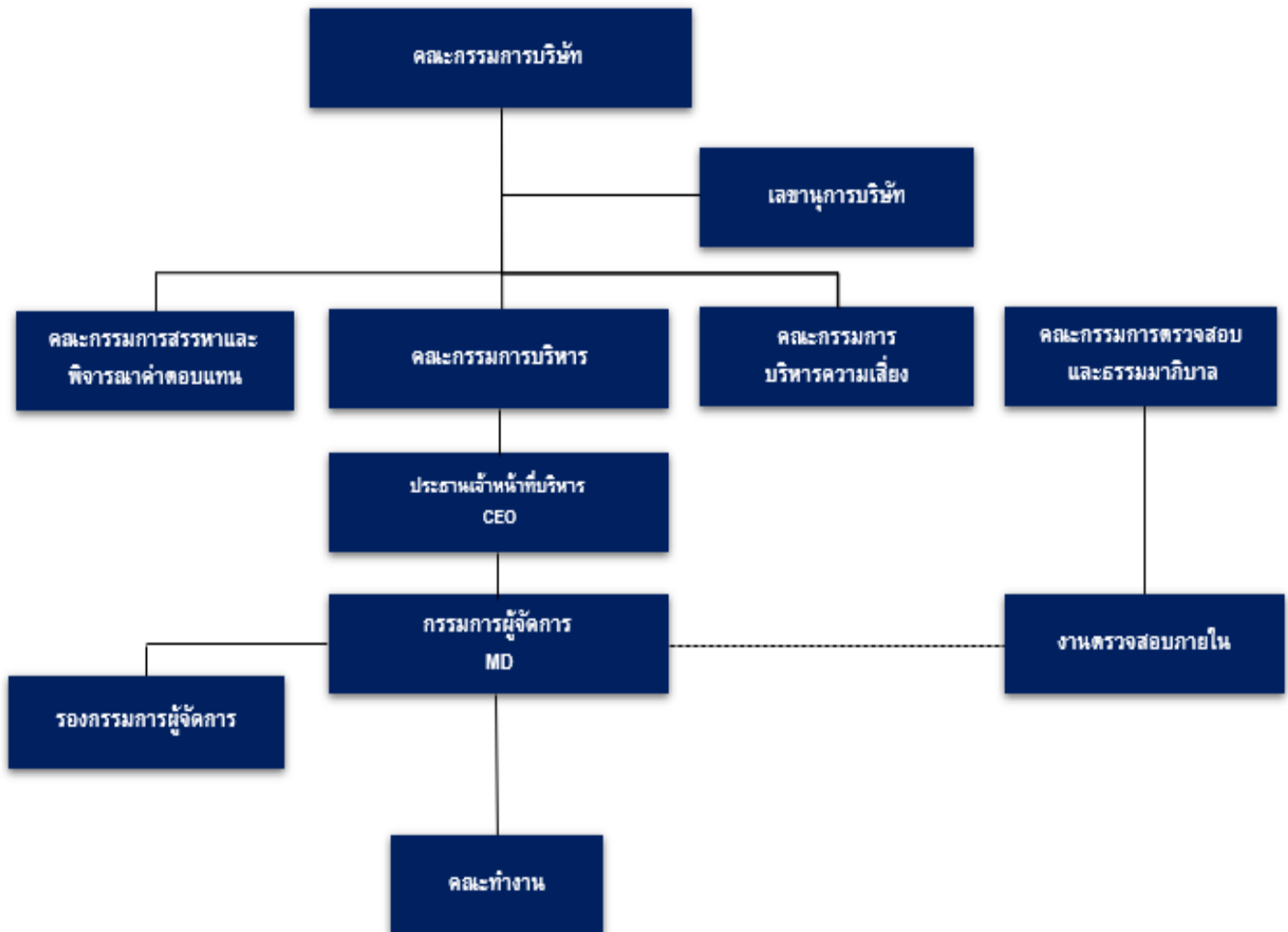
Definition

Definition	Meaning
Company	Asia Metal Public Company Limited
Subsidiaries Company	1. Limited companies or public limited companies over which the Company has control. 2. Limited companies or public limited companies that are controlled by a subsidiary under (1). 3. Limited companies or public limited companies that are under the control of the business in a chain, starting from being under the control of the subsidiary under (2).
Associate Company	1. Companies in which the Company or its subsidiaries hold altogether more than 20 percent but not more than 50 percent of the total number of shares with voting rights of the company being held. 2. Companies in which the Company or its subsidiaries have the power to participate in decision-making on the financial and operating policies of the Company, but not to the level of controlling such policies, and are not regarded as subsidiaries or joint ventures.
Group of Companies	Affiliates of Asia Metal Public Company Limited.
Director	Directors of Asia Metal Public Company Limited and its affiliates refer to a person who has the qualifications of a director under Section 68 of the Public Limited Companies Act B.E. 2535, is elected by the shareholders' meeting to be a director, executive director, Director, and Advisor to the Board of Directors.
Executive	Executives of Asia Metal Public Company Limited and its subsidiaries herein mean employees with subordinates.
Employee	Labor contractors or special employment contracts, including permanent employees, temporary employees during probation, and employees of the company with a fixed duration of employment.
Related Person	Spouses, children, parents, siblings/close relatives of directors, executives, and employees at all levels, including employees and representatives of the Company, and companies in the group that act on behalf of the Company, regardless of whether or not they have the authority to do so.
Fraud and Corruption (Anti-corruption)	Acts or omissions in performing duties or abuse of power in positions in all forms, whether giving or accepting bribes to government officials or any other person who conducts business with the company or companies in the group, no matter in the country or abroad, in order to obtain undue benefits both to the organization, themselves or those involved, as well as the use of information received from the Company's performance of duties to perform any acts that are beneficial to oneself and/or others in order to obtain money, assets, and other benefits that are inappropriate for business or any improper benefits for oneself and/or others, both directly and indirectly, except in the case of laws, regulations, announcements, regulations, local traditions, or trade customs to do so.

Definition	Meaning
State Enterprise	The state has significant control, with full ownership in the majority or minority, but to a significant extent. The characterization of state-owned enterprises varies according to their legal form and operations. State enterprises may have the objective of public policy.
Government Official	<p>Holders of political office, civil servants, or local officials with positions or regular salary; employees or persons working in state enterprises or government agencies; local administrators and members of local councils who are not holding political positions; officials under the law on the nature of local government and includes directors, sub-committees, employees of government agencies, state enterprises, or government agencies; and a person or a body of persons exercising or being entrusted to exercise the administrative power of the state in order to take any action in accordance with the law, whether it is established in the bureaucratic system, state enterprises, or other state affairs. According to the meaning set forth in the Anti-Corruption Act, it includes government officials, officials, state enterprise employees, employees, agents, or any other person representing the following agencies:</p> <ul style="list-style-type: none"> • Ministries, bureaus, departments, or government agencies (e.g., Customs, Immigration, etc.) • International organizations (e.g., World Bank, International Monetary Fund, etc.) • Political parties, political office holders, or candidates for election (both government and opposition), local administrators • Regulatory bodies (such as the Securities and Exchange Commission, Bank of Thailand, Stock Exchange of Thailand, etc.) • State-owned enterprises or other companies or organizations owned or controlled by a state or government entity.
Private Agency	Organizations that are not affiliated with or have partnerships with the state.
Giving and Receiving Gifts	Giving and accepting gifts, items, or souvenirs on various occasions or trade conventions to maintain good relations between the company and related agencies.
Bribery	Offering, promising, giving, receiving, or demanding benefits as an inducement to an individual to do something that is unlawful, illegal, contrary to good morals, ethics, laws, regulations, and policies, or to destroy trust.
Bribe	Other assets or benefits. In this case, "properties" means assets and intangible objects that may have a price and can be taken, such as money, a house, a car; "other benefits" such as building a house or decorating a house without charge or unusually low price, free home rental, forgiveness of debt, or traveling.
Entertainment and Hospitality	Expenses incurred on special occasions, traditional hospitality, or trade conventions to maintain good relations between companies and related agencies without expecting to receive services, rewards, or privileges that are not in accordance with business ethics.
Donation	Giving or receiving money or any other benefits without expecting a return by individuals or legal entities or through organizations for charity and/or to benefit any cause. Donations can take many forms, including offering cash, services, new or used goods such as clothing, toys, food, and vehicles.

Definition	Meaning
	It can also refer to essentials in medical care, relief or humanitarian assistance, and development support.
Giving and Receiving Support	Subsidies, aid, or contributions paid to or received from customers, partners, and business associates with the purpose of supporting business operations, brand promotion, or the reputation of the company. Such actions are beneficial in building trade credibility and strengthening business relationships as appropriate for the occasion.
Political Contributions	Giving property, money, things, rights, or any other benefits to help or support political parties, politicians, or persons with political responsibilities, as well as political activities either directly or indirectly.
Facilitation Payment	A small expense paid to an informal service worker, where the giver is not intended to persuade service personnel to act, not act, or delay acts that are against their duties. It is to ensure that the service personnel will follow the process or as an urge to take action faster. The process does not require the discretion of the service staff and is an act of duty of the officer who provides that service, including the right that the juristic person should be entitled to by law, such as applying for a license, requesting a certificate, and receiving public services, etc.
Giving Returns or Any Other Benefits	Giving things, privileges in the form of property, monetary, or non-monetary returns or any other benefits as a reward or to build a special relationship.
Traditional	Festivals or important days where gifts may be given, including an opportunity to congratulate, express gratitude, welcome, express condolence, or provide assistance according to the manners practiced in society, as well. (According to the Regulations of the Office of the Prime Minister on Giving or Receiving Gifts of Government Officials B.E. 2544)
Conflict of Interest	Conflicts of personal interests of employees and public benefits plan. It is a situation or action in which an employee performs his/her own interests that affect decision-making or the performance of duties in the position that person is responsible for and also affect the interests of the Company as a whole. That situation may cause the person to lack objectivity in making transparent decisions.
Hiring Government Employees (Revolving Door)	Hiring a person who is or used to be a government employee, including civil servants, persons holding political positions, government officials, local employees with regular positions or salaries, employees or persons working in state enterprises or government agencies, local executive and non-local council members, persons holding political office under the law on local administrative characteristics, including directors, sub-committee members, consultants, and employees of government agencies, state enterprises or government agencies, and persons or groups of persons exercising power or being entrusted with exercising the administrative power of the state in order to carry out any act in accordance with the law, whether it is established in the bureaucratic system, state enterprises or other state affairs.

Structure and Working Group for Anti-Corruption Measures and Sustainability Responsibility.



- 1) **The Board of Directors** is responsible for setting policies, supervising, and ensuring that the company has an effective anti-corruption system. They should promote the importance of anti-corruption and integrate it into the corporate culture. If the audit committee reports any fraud or corruption that affects the company, the Board of Directors should provide advice, recommendations, review penalties, and work with the Chief Executive Officer and the Executive Board to find solutions.
- 2) **The Audit Committee** is responsible for overseeing the anti-corruption policy, ensuring that the company complies with its legal and ethical obligations, and implementing anti-corruption measures.

- 3) **Executive Directors and Senior Executives** are responsible for implementing the anti-corruption policy, setting up a system to support it, and communicating it to all parties involved.
- 4) **Internal auditors** are responsible for auditing and reviewing operations in accordance with policies, regulations, and related laws. They should ensure that there is an appropriate and adequate internal control system against fraud risks and report to the Audit Committee regularly.
- 5) **Company executives** are responsible for ensuring that their subordinates are aware of and understand the Policy through adequate and regular training.
- 6) **A Working Group** is appointed from responsible persons of various departments in the organization chart to implement this policy. They should monitor the effectiveness of the policy, communicate it to all departments and parties involved, clarify and answer questions, and report to the Board of Directors.

Risk Assessment for Fraud and Corruption:

The Corporate Anti-Corruption Committee should present the results of the corruption risk assessment of the company's business activities and its subsidiaries. They should identify high-risk tasks and potential impacts, including measures to prevent or reduce effective risks, and monitor and evaluate the implementation of such measures. They should prepare a report on a regular basis for the Audit Committee.

Internal Control and Compliance with the Anti-Corruption Policy:

The company has in place audit processes and internal control systems throughout the organization to foster a culture of good governance, risk management, and systematic review. These processes and systems help prevent corruption within the organization by verifying that no actions are taken that could be channels for corruption. Sales and Marketing, Product Investment Management, Procurement and Contracting, Finance, Accounting, recording data, and Human Resource Management (including hiring, compensation, employee training, and disciplinary action) are all subject to the company's internal control systems, which include clear and appropriate delegation of authority and separation of duties.

The company has an independent internal audit unit to assess the internal control system, risk management system, and corporate governance process of the company's activities or systems. The internal audit unit assesses risks by covering both the financial and record-keeping aspects of

the accounting process, ensuring compliance with accounting standards, principles, and applicable laws related to financial reporting and expenses documentation. The company's information is stored and maintained in a verifiable and efficient manner in accordance with the intended objectives.

To ensure compliance with the anti-corruption policy and relevant laws or regulatory agencies, the company's financial statements and operating results are audited by a certified public accountant on a quarterly and annual basis. This ensures that financial or accounting information and reports are accurate, reliable, timely, and in accordance with legal requirements.

The Audit Committee oversees the company's internal controls, including financial reporting and other processes related to anti-corruption measures.

Anti-Corruption Policy and Guidelines

The company has established a policy for its directors, executives, employees, employees of the company's subsidiaries that the company has control over, including associated companies, to comply with anti-corruption measures by refraining from any acts related to corruption and fraud. All forms of corruption that seek direct or indirect benefits for oneself, family, friends, and acquaintances, whether in the capacity of a recipient, giver or offeror of bribes, whether monetary or non-monetary, to government agencies or private entities that the Company has done business with or contacted, must be strictly avoided by following the "Anti-Corruption Guidelines" in accordance with the company's policy of good corporate governance, ethics, and business ethics for employees to adhere to as a guideline for operations.

To provide guidelines for employees in receiving and giving gifts, receptions, hospitality services, or any other benefits as specified in the Code of Ethics and Business Conduct, this guideline has been prepared as part of the Company Group's good corporate governance policy and business ethics.

Policies and guidelines:

1. Giving or receiving gifts, souvenirs, or any other benefits:

Employees can give gifts, souvenirs, or other benefits according to tradition or on appropriate occasions, provided that the giving does not violate relevant laws and local customs and is in a form that enhances the company's image. The giving of gifts should not have the intention to persuade the recipient to act as a facilitator or take actions that give the Company an advantage over its competitors or cause the Company to act unlawfully or contrary to trade customs. The following guidelines should be followed :

1. Directors, executives, and employees at all levels, including their families, are prohibited from receiving or giving gifts, souvenirs, or any other benefits from customers, partners, contractors, sub-contractors, or anyone involved in business with the company. However, gifts may be given or received according to tradition or to maintain good relations between individuals or as a goodwill relationship between organizations, provided that they do not affect any business decisions of the recipient.
2. Directors, executives, and employees at all levels are prohibited from receiving or promising to receive or giving money, assets, things, or any other benefits to any person with the intention of inducing them to perform their duties or ignore practices that fall into the aforementioned scope.
3. The company must keep evidence of spending money showing the value of gifts, souvenirs, or any other benefits for later review.

Guidelines and procedures:

1.1 Giving of gifts, souvenirs, or any other benefits:

1.1.1 Giving gifts or souvenirs traditionally can be done without conflicting with related laws and local customs and should be given in a form that enhances the image of the company and companies in the group as follows:

- a. Calendar, diary
- b. The Company's products and companies in the group (Company Product)
- c. Products used as public relations media of the company and companies in the group (Corporate Logo/Corporate Brand)
- d. Royal project products, royal projects community products in the Company's operational areas and companies in the group, or charity products or public interest or products that support sustainable development.

1.1.2 Giving gifts and souvenirs should be carried out in accordance with the same standard to avoid discrimination.

1.1.3 Do not give gifts, souvenirs, assets or any other benefits to spouses, children or related persons of government officials, customers, trading partners and contact persons because by circumstances, it is considered a replacement.

1.1.4 Giving souvenirs on important business occasions such as establishment day or business contract signing can be done. However, if the value of the gift exceeds 2,000 baht, it must be approved according to the Letter of Authorization (LOA) and recorded in the form "Report Form for Giving or Receiving Gifts, Souvenirs, or Other Benefits."

1.2 Receiving Gifts, Souvenirs, or Other Benefits :

1.2.1 Company personnel and those of its associated groups refrain from accepting gifts, souvenirs, or any other benefits in all cases. They have a duty to thoroughly inform third parties about the policy of refraining from accepting such gifts.

1.2.2 In the event that it is necessary to accept gifts, souvenirs, or other benefits and they cannot be returned, the recipient must report to the line supervisor and record the receipt in the form "Giving or Receiving Gifts, Souvenirs, or Other Benefits Report." Such items should be delivered to the Human Resources Department or the Secretary Department in order to collect them as prizes for employees on important festivals or to request approval to continue donating them to persons or external agencies for charitable or public benefits as appropriate. However:

- a. In the case of pens, calendars, and diaries used as public relations materials of the company, employees can receive them as personal gifts or distribute them to other agencies.
- b. In the case of consumer items with an expiration date of less than one month, it is at the discretion of the division supervisor receiving the gift for management.
- c. In the case of receiving gifts or souvenirs on behalf of the organization, such as signing a business contract, the recipient must report the acquisition in the form "Report Form of Giving or Receiving Gifts, Souvenirs, or Other Benefits" and let the supervisors in the line of work approve and acknowledge. However, such gifts or souvenirs must be the property of the Company and sent to the Human Resources Department or the Secretary Department for future use.

1.2.3 Company personnel and those of its associated groups who work overseas and receive gifts from partners/vendors, customers, or any joint ventures should accept them if it is impossible to refuse. The recipient must provide the "Report Form on Giving or Receiving Gifts, Souvenirs, or Other Benefits" and hand it over to the Human Resources Department or the Secretary Department to prepare a written record, which will become the property of the company.

1.2.4 In the case of reimbursement of gifts or souvenirs from the Human Resources Department for use in other occasions, the applicant must prepare a "Report Form on Giving or Receiving Gifts, Souvenirs, or Other Benefits" for approval of giving gifts, souvenirs, or any other benefits or subsidies to responsible agencies. The form must be approved by a director or higher level executive.

2. Entertainment or Hospitality Services

The company recognizes the importance of having good relationships with its stakeholders. Therefore, spending on entertainment and business hospitality services, such as food and beverage receptions, sports entertainment, and other expenses directly related to business practices or trade customs, including providing business insights, can be done but must be spent rationally and should not affect operational decisions or create conflicts of interest. However, the expenses incurred must also comply with the company's Letter of Authorization (LOA).

Guidelines and Procedures:

- 2.1 Expenses incurred from entertainment and hospitality services must be reported on the "Report Form of Giving or Receiving Gifts, Souvenirs or Other Benefits" and must be approved according to the company's approval authority table. The reception and hospitality service should take into account the suitability of the host or hospitality recipient or relevant third party.
- 2.2 Applicants must keep evidence identifying persons or agencies of trading partners. Clear receipts of entertainment and hospitality must be kept for audit purposes.
- 2.3 The expenses incurred must not be contrary to the law and should be in accordance with the policy of good corporate governance, ethics, and business ethics of the company.
- 2.4 Applicants must prepare a project detailing steps and operational guidelines, as well as details about the time, place, and budget for this action, and present it to the approver at least 7 days before the event schedule for consideration.
- 2.5 The approver should review the approval request, taking into account the objectives, opportunities, and appropriate value before approval.

3. Charitable Contributions

The company has a policy to help donate to charitable organizations or provide support to organizations for the public good. The action must be made on behalf of the company only, and the donation must be approved by the Director at their discretion, including the value of the donation and its suitability.

Guidelines and Procedures:

- 3.1 Donations and contributions to the project objectives must prove that activities have been carried out to achieve the project objectives and cause real benefits to society or according to the objectives of operating with social responsibility.
- 3.2 The donation of money or property of the company must be made in the name of the company only, and the donation must be for a foundation, public charity organization, temple, hospital, nursing home, or organization authorized by the government for the benefit of a certified or credible society, and there must be clear and reliable evidence of a request for donation from the authority of the organization. The donation must follow the company's procedures.

- 3.3 Persons who wish the company to donate have a duty to assign a person responsible for the activities that receive the donation clearly, there is a follow-up, and submission of documents reporting the results of the project or activities that the company has donated as evidence after disbursement. Money must be used to ensure that the use of donations is not for corruption.
- 3.4 Persons wishing the company to make charitable donations must prepare the "Donation/Sponsorship Request Report Form" for approval of granting by specifying the recipient's name, purpose or benefit of the sponsorship, and specifying the location of the activity where the funding was used, along with supporting documents proposed for approval from the supervisor or authorized person of the company.
- 3.5 Charitable donations in the form of financial assistance or other forms, such as providing knowledge or donating time, etc., can be done as part of social return activities, as well as public relations, to strengthen the good image of the company without expecting business returns.
- 3.6 Cash donations will only be made through the recipient's bank account.

4. Sponsorship

Sponsorships can only be made on behalf of the company and must have a clear purpose. Any contribution, whether in the form of money, goods, or other resources, must be made in a transparent and legal manner to ensure that such funding is not used as a means of avoiding bribery. The sponsorship must be for the purpose of promoting public relations, business, and the good image of the company. This can be achieved through supporting cultural, social, and environmental activities, educational and sports initiatives.

Guidelines and Procedures

- 4.1 Individuals wishing to support the company are responsible for inspecting individuals, juristic persons, funds, organizations, foundations, companies, stores, and all types of sponsors that the company presents to the authorized person as follows:
 - 4.1.1 To ensure that funding is not used as a means of avoiding bribery.
 - 4.1.2 In the case of a project, it must be demonstrated that actions have been taken to support the achievement of project objectives. The purpose of the project must be legitimate, not contrary to morals and customs, and not an inducement to act against duty.
 - 4.1.3 To ensure that such activities are not associated with benefits or rewards to any person or entity, except for the recognition of honor as is common practice.
- 4.2 Persons who wish to provide support from the company must complete the "Donation/Sponsorship Request Form" for business purposes, good image, and appropriate occasions and reputation of the company's business partners. Disbursements must specify clear objectives and have verifiable evidence to ensure that the use of sponsorships is not done for corruption.

4.3 Monitoring is necessary to ensure that contributions are used for public benefit and/or for the purpose of donation and/or sponsorship, without any hidden purpose or to gain an improper business advantage.

4.4 Gather factual sponsorship information for analysis, planning, and insider information, considering future sponsorships.

5. **Political Assistance**

The company has a policy of political neutrality and does not support political parties, groups, or individual politicians, either directly or indirectly. The company's regulatory transaction authorization authority cannot approve transactions involving political contributions.

Guidelines and Procedures

5.1 The company operates with political neutrality and will not support or take any action aligned with any political party.

5.2 The company does not provide financial or material support to political parties, politicians, or any political candidates for the purpose of benefiting the company's business.

5.3 Employees have the freedom to participate in political activities under the provisions of the Constitution and other relevant laws but must not pretend to be employees or bring any property, equipment, or tools of the company for the benefit of any political action. If participating, they must be careful not to take any action that gives the impression that the company supports or is concentrated on any political party.

6. **Employment of Government Employees:**

- The company has no policy to support hiring or paying expenses for government employees to carry out procedural or incentivized actions such as obtaining permits, accreditation, and public services, etc.
- The company requires transactions with the government sector and working with government officials and persons involved in the Company's business operation to be carried out accurately, transparently, and honestly according to the rules and regulations of that government agency and in accordance with relevant laws.
- To ensure that the Company selects personnel who used to be government employees in accordance with the criteria set by the Company so as not to use such actions in return for obtaining any benefits and disclose information for transparency and verifiability.

Guidelines and Control Measures:

6.1 6.1 The Human Resources Department interviews and examines the hiring of people who have worked with government agencies before about various agreements made with government agencies and according to the rules and conditions set by the company.

6.1.1 The person should not be or have been a government employee unless the person has retired from the aforementioned position for at least 6 months before applying and being accepted as an employee.

However, the company will not take any action to cause that person to commit any act that is in breach of the agreement, which will lead to prosecution.

6.1.2 Government employee applicants must disclose information and certify the accuracy of the information provided to the company. The company will comply with the laws related to the protection of personal data B.E. 2562.

7. Storing, Accessing, Recording, Maintaining, and Backing up Financial Data:

The company is committed to maintaining standards regarding work systems and information technology systems, which are the basis for building an effective control system. The company will take steps to ensure that financial information is accurate, complete, transparent, and verifiable, as well as providing a system for storing, accessing, recording, maintaining, and backing up computer data in an effective way so that it is available at all times. This includes preventing the use of information for personal benefit, including those involved and/or doing business that competes with the company both directly and indirectly.

Guidelines and Procedures:

- 7.1 The responsibilities of all users and data controllers in computer systems are defined.
- 7.2 Evaluate risks and determine guidelines to control risks to an appropriate level.
- 7.3 Provide a security system for information in the computer system to prevent data access by unauthorized persons, including having adequate backup systems and being able to verify documents and financial data later.
- 7.4 Operations related to information technology and communication systems must comply with the Company's computer system and network usage policy at all times.

Financial Internal Control Measures, Accounting Record, and Document Retention:

1. It is the Company's policy to comply with all applicable standards, principles, and laws regarding the reporting of accounting and financial information.
2. All types of expenses must have supporting documents, including approvals according to the authorization. The storage and maintenance of company information must be in accordance with relevant laws and regulations.
3. The Company does not allow the recording of false, misleading, incomplete, inaccurate, or manipulated account information and must not have an account outside of the financial statements to support or conceal improper payments.

8. Contracts between the Company and Customers or Business Partners:

The company has trade and investment policies that adhere to business ethics and good corporate governance policies toward shareholders, stakeholders, and society. The company has a policy against demanding, offering, or giving financial benefits or any other benefits dishonestly to anyone or any organization. Any practice or omission that is unlawful or unethical to obtain business contracts and benefits is not tolerated. Guidelines for managing contracts between the company and customers or partners are as follows :

Doing Business with Honesty:

The company must not practice or tolerate any form of corruption, exploitation, or embezzlement and must have a procedure for monitoring and enforcing compliance with the Code of Conduct. The Company shall not offer gifts, souvenirs, payment of fees, services, discounts, other privileges, or any other benefits to the employees of the partner companies or their families to gain special privileges from business partners unless permitted by local customs and to the extent not contrary to law. The Company shall not offer or give anything of value, including money, bribes, hospitality, or bribes, to government officials involved in company-related transactions, including training. Directors, executives, and employees must comply with the anti-corruption policy and guidelines, including prohibiting bribes for business benefits of business partners. The Company's directors, executives, and employees are prohibited from giving, receiving, or soliciting anything of value such as gifts, payments, or other benefits from customers or business partners. The company provides channels for whistleblowing to customers or business partners to report any actions that violate this policy and practice to the company.

General Procurement:

The company has a policy that procurement of assets, materials, and equipment, and general service procurement must clearly specify the purpose of procurement, with actual procurement presented to the authorized person according to the company's procedures. High-value procurement should compare prices from multiple vendors or service providers for transparency and fairness to all parties. The company does not have a policy of receiving financial benefits or other forms of benefits from sellers or service providers. If goods or services do not meet the terms of the agreement or have characteristics that do not meet the order or quality standards, the company will not receive them.

Conflicts of Interest:

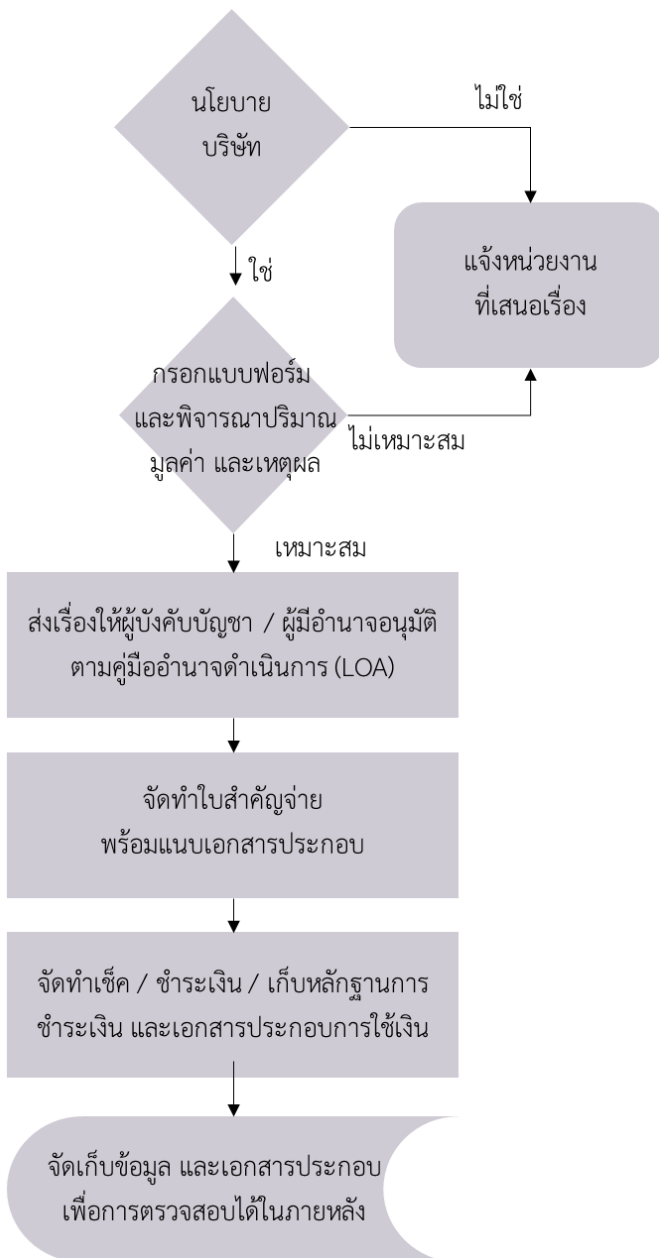
The Company shall not be involved in any financial or other relationship with any employee of the Company that could lead to a potential or perceived conflict of interest with the Company. Company employees are prohibited from working in the positions of executives, directors, employees, agents, or consultants of partner companies unless with the consent of the Company's management.

Fair Business Practices and Competition:

The company adheres to the principles of fair business, advertising, and competition, including all regulations. The company's partners shall have appropriate means to protect customer information and to prohibit partners from engaging in the misuse of confidential information, pricing, bidding, or collective bargaining to reduce competition in any transaction involving the Company. The company aims for business partners to understand and comply with the laws related to fair competition and antitrust.

Practical steps consist of

1. Giving or receiving gifts, souvenirs or any other benefits.
2. Receptions and hospitality services.
3. Charitable donations
4. Sponsorship
5. Political assistance



1. The agency proposes to consider whether the proposal is in accordance with the company's policy or not.
2. Record the gift in the appropriate form:
 - 2.1 "Gift, Souvenir, or Other Benefit Giving or Receiving Report Form" (Case 1, 2)
 - 2.2 "Donation/Sponsorship Request Form" (Case 3, 4, 5) and consider the appropriateness in terms of quantity, amount, and supporting reasons.
3. Nominate supervisors/authorized persons according to the Letter of Authorization (LOA).
4. The Accounting and Finance department examines the supporting documents for the payment voucher.
5. The Accounting and Finance Department delivers the cheque to the authorized signatory, accompanied by proof of correct receipt of money.
6. The Accounting and Finance Department stores all documents in a file or electronic format that can be searched, inspected, or used to verify past data.

Communication and Dissemination of Anti-Corruption Policy

The company has communicated and disclosed various information related to the anti-corruption policy to directors, executives, employees, subsidiaries, associated companies, or companies with controlling power (if any), including business representatives and persons related to the Company's business. They are notified via email, intranet system, public relations board, website, Annual Registration Statement, Annual Report, or other appropriate channels. The aim is to ensure that the company is an organization free from corruption, with honesty, integrity, and transparent operations that can be traced.

Communication and Disclosure Guidelines

1. Communicating to directors, executives, and employees
 - 1.1 The company has communicated the anti-corruption policy to all employees via email, company website, intranet system, or public relations board. All employees are required to sign for acknowledgment and compliance with the policy to ensure that they have sufficient knowledge and understanding to implement such policies seriously.
 - 1.2 There is an orientation for executives or new employees to know the anti-corruption policy of the company. The orientation includes specifying messages that show their acceptance of complying with the anti-corruption policy. The company also includes policies on good corporate governance, ethics, and business ethics of the company in labor contracts for executives or new employees to sign for acknowledgment and strict adherence.
 - 1.3 The company provides regular training to educate the Board of Directors, executives, and employees of the Company about anti-corruption measures, the company's expectations, and penalties in case of non-compliance with such measures.
2. Notifying customers or partners
 - 2.1 The company prepares information about the anti-corruption policy as part of the terms of the contract between the company and the customer or seller, service provider, to inform them from the commencement of doing business with each other.
 - 2.2 The company prepares documents to notify customers or business partners of the anti-corruption policy. The documents include information on the company's policy on corruption, including receiving or giving gifts, various rewards, receptions, etc.
 - 2.3 The company communicates the anti-corruption policy to customers or business partners through various forms such as contracts, company websites, email, or other related channels.
3. Notifying Subsidiaries, Associated Companies, or Controlling Companies (if any), Business Representatives, and Generally Related Persons
 - 3.1 The company publicizes its anti-corruption policy on the company's website or in the annual information disclosure form or in the annual report.
 - 3.2 The company prepares any media or symbols that show support for the anti-corruption policy.

Human Resource Management

This anti-corruption policy covers personnel management processes from recruitment or selection, promotion, training, employee performance appraisal, and compensation. The company requires supervisors at all levels to communicate and understand with employees under their responsibilities and must supervise and supervise operations to ensure efficiency. The company has a human resource management process that is fair and protects employees who refuse or report corruption related to the company. The company will not demote, punish, or have a negative effect on employees, even if that action will cause the company to lose business opportunities. The company provides channels for whistleblowing and safe whistleblower protection when employees want to provide information or clues, including when employees need advice on compliance with anti-corruption measures.

The company has operations to make employees aware of anti-corruption measures, as follows:

- The Anti-Corruption Committee, corporate level, periodically presents the anti-corruption progress to the Board of Directors for understanding.
- There is training for new employees through an orientation process, including understanding anti-corruption measures, company expectations, and penalties for non-compliance by employees.
- The company has a process of communicating to employees via email or the company's public relations board or intranet.

Penalty

Violations or non-compliance with this policy, by any director or employee, will be subject to disciplinary action and may result in warnings, penalties, or termination (in case the Company deems it necessary). In addition, there may also be prosecution, both civil and criminal prosecution, if found to be a violation, not acting intentionally, and the company will use compliance with the anti-corruption policy as one of the factors in determining performance evaluation, compensation, and employee promotion. The company has no policy of demoting, punishing, or negatively affecting employees who reject corruption, even if doing so would cause the company to lose business opportunities.

Policy of Violation

The Company regards compliance with the Anti-Corruption Policy as a very important matter which all directors, executives, and employees must strictly follow. Violation or non-compliance is considered a misdemeanor.

The company will punish according to the company's regulations and/or relevant laws of Thailand.

Manual of Business Ethics and Code of Conduct

The company is committed to conducting business with honesty and morality according to the principles of good corporate governance. In making decisions and conducting business-related actions, they must be done with transparency, prudence, and caution to avoid damage to the company, according to the "**Business Ethics and Code of Conduct**" that has been announced for use as a clear guideline and communicated to directors, executives, and employees to acknowledge and realize the importance, including as a guideline that can be used as the basis for determining the appropriateness of behavior that may risk conflicting with ethics and business ethics.

Conflict of Interest Policy

The Company has determined the conflict of interest policy, guidelines, and procedures according to the "**Conflict of Interest Policy**" that has been announced to support the internal control system and internal audit system to be more efficient.

Measures and Whistleblowing Channels or Complaints

The Company has determined a whistleblowing or complaints policy, including procedures and appropriate protection measures for whistleblowers or complainants according to the "**Whistleblowing or Complaint Policy**" that has been announced as a clear guideline to make complaints more efficient.

Monitoring and Review

The company requires the Board of Directors, executives, and all employees to acknowledge, understand, and strictly comply with the policies and practices specified in this anti-corruption measure. Executives at all levels of the organization are responsible for monitoring and ensuring the implementation of the policy. It is an important mission to ensure that employees under the supervision of all departments are aware of, understand, and comply with the anti-corruption measures. If any director, executive, or employee commits an offense as specified, they will receive strict disciplinary action. If there is an act believed to be against the law, rules, regulations, and regulations of the government, the company must consider referring the matter to government officials for further legal action.

The Board of Directors requires all parties involved according to the structure of duties and responsibilities to follow up and review their own operations. If anyone finds any suspicions about operations or activities or any business transactions that may violate policies, measures, or guidelines for anti-corruption or violations of laws, rules, regulations, or the company's Articles of Association, such information must be notified or reported to relevant persons through the channels for complaints and whistleblowing.

The company has set up regular follow-up and reviews of measures and guidelines on an annual basis or when there are significant changes that affect fraud risk management. This is to ensure that such measures are consistent with the good corporate governance policy and the Company's Code of Business Conduct and Ethics, as well as compliance with regulations and other relevant laws. In addition, improvements must be approved by the Board of Directors, and the measures to improve them are communicated throughout the company.

The Audit Committee will supervise compliance with anti-corruption measures by reviewing relevant measures and internal controls as appropriate. They will make recommendations to the Board of Directors, executives, and relevant employees to ensure that they are always up-to-date.

Related documents:

1. Business Ethics and Code of Conduct.
2. Conflict of Interest Policy.
3. Whistle Blowing or Complaint Policy
4. Handbook of Operational Authority (Letter of Authorization : LOA).
5. Policy on the use of computer systems and networks of the company.
6. Good Corporate Governance Policy.

Related forms

1. FM-ATC-01 Record of acknowledgment and consent to comply with manuals and policies related to the company.
2. FM-ATC-02 Giving Report Form or accepting gifts, souvenirs or other benefits.
3. FM-ATC-03 Donation/Sponsorship Request Report Form.
4. FM-ATC-04 Report a violation or non-compliance with the Code of Ethics and Business Conduct.
5. FM-ATC-05 Conflict of Interest Report Form.
6. FM-ATC-06 Conflict of Interest Disclosure Form (Director, manager, supervisor, section head, staff).
7. FM-ATC-07 Conflict of Interest Review Summary Report Form.
8. FM-ATC-08 Conflict of Interest Disclosure Form.
9. FM-ATC-09 Whistle Blowing and Complaint Form.
10. FM-ATC-10 Record of clues or complaints and check the preliminary facts.
11. FM-ATC-11 Investigation Report.
12. Controlling records and summary of statistics for whistleblowing or complaints.