	Asia Metal Public Company Limited		
	ANTI-CORRUPTION POLICY		
	No. of Document	Date of Effectiveness	Review
	AMC-ATC-001	3 January 2024	01
	Creator : Secretary Department		Approver : Board of Directors


นโยบายการต่อต้านการทุจริตคอร์รัปชัน

(ANTI-CORRUPTION POLICY)

This document is effective from January 3th, 2024 onwards




.....
 Mr. Verachai Suteerachai
 Chairman of the Board of Directors

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Introduction


Asia Metal Public Company Limited (the “Company”) is committed to conducting business with ethics. By adhering to responsibility towards all stakeholders. The company has joined as “Thailand's Private Sector Collective Action Coalition Against Corruption” to show intent and commitment to combat corruption in all forms. The company has a Policy Assign responsibility Guidelines and requirements for appropriate action. To prevent corruption in all business activities of the company and to make decisions and conduct business that may be at risk of corruption has been carefully considered and treated The company has therefore prepared a written "Anti-Corruption Policy ". To provide clear guidelines for conducting business and develop into a sustainable organization. The Company has designated subsidiaries, associated companies, or other companies that the Company has control over (if any) as business representatives. Including people involved in conducting business. Strictly follow the Anti-Corruption Policy.

The Board of Directors and executives of Asia Metal Public Company Limited sincerely hope that this Policy will be useful for operators and those involved including those who are interested in applying it to their work further.

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Message from the Chairman of the Anti-Corruption Board


Asia Metal Public Company Limited realize the importance of conducting business and administration with honesty, transparency and social responsibility in accordance with the principles of good corporate governance including the principles of ethics and business ethics. By adhering to the principles of fair business operations. Manage work with transparency and responsibility to stakeholders. Have social and environmental responsibility

The company is dedicated to fostering an organizational culture by establishing guidelines and policies against corruption (Anti-Corruption Policy). This includes implementing best practices that align with the Thai laws pertaining to anti-corruption, with the genuine aspiration of receiving cooperation and support from all sectors. This collaborative effort aims to monitor, supervise, and ensure that the company operates free from corruption, in accordance with the spirit of the policy.

To ensure that the company establishes a clear policy defining responsibilities, guidelines, and necessary operational requirements to prevent corruption in all business activities and decisions carrying potential corruption risks. Corruption risks are meticulously evaluated and addressed. Consequently, the company has formulated a comprehensive written 'Anti-Corruption Policy' to offer precise guidelines for conducting business and to foster the development of a sustainable organization.

Announced on January 3, 2024

Mr. Verachai Suteerachai
Chairman of the Board of Directors

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Definition

Definition	mean
Companies and individuals involved in business	Asia Metal Public Company Limited (AMC) , affiliated companies including subsidiaries and associated companies, employees, executives, directors, customers, partners and all groups of stakeholders. whether in the form of a natural person, juristic person, or organization, agency
Corrupt	Seeking illegitimate benefits for oneself or others.
Corruption	Engaging in or abstaining from fulfilling one's duties within their position or exercising authority illegally is considered corruption. This encompasses the act of offering or receiving bribes, whether to government officials or any individual conducting business with the company or its affiliated entities, irrespective of the location—be it domestic or international—with the intent of gaining undue advantages. Additionally, utilizing information acquired through company duties to benefit oneself and/or others, seeking financial gains, assets, or any inappropriate business advantages, whether directly or indirectly, is deemed corruption. However, these actions are permissible only when compliant with established laws, regulations, official announcements, local customs and traditions, or trade practices.
Government officials/government employees	<p>Under the law governing the prevention and suppression of corruption, the term 'political office holder' includes civil servants, local government employees holding positions or receiving regular salaries, individuals employed in state enterprises or government agencies, local administrators, and council members who are not political office holders. This definition extends to officials outlined by laws governing local areas, incorporating directors, sub-committee members, and employees of government agencies, state enterprises, or similar entities.</p> <p>Furthermore, it encompasses individuals or groups authorized to exercise administrative authority on behalf of the state, whether within bureaucratic structures, state enterprises, or other government-controlled institutions. This category, as specified by anti-corruption laws, involves civil servants, officials, state enterprise employees, staff, agents, or any other individuals representing the following agencies:</p> <ul style="list-style-type: none"> ● Ministries, bureaus, departments, or government agencies (e.g., Customs Department, Immigration Bureau, etc.) ● International organizations (e.g., World Bank, International Monetary Fund, etc.) ● Political parties, political office holders, election candidates (both government and opposition parties), and local administrators ● Regulatory agencies (e.g., Securities and Exchange Commission, banks, Stock Exchange of Thailand, etc.) ● State-owned enterprises, companies, or other organizations owned or controlled by the state or government agencies.



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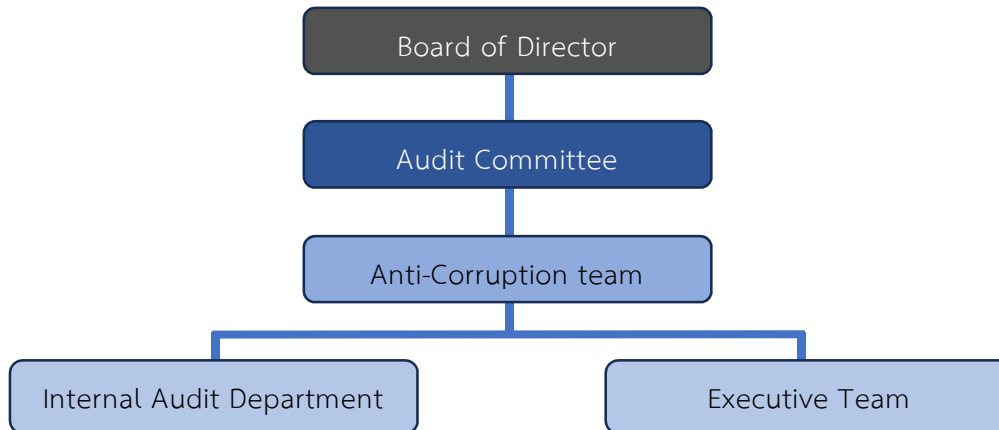
Gift	Offering property, financial support, contributions, or any form of benefits based on friendship, affection, or assistance, or as a reward. This includes granting exclusive privileges not available to the general public, such as property price reductions or special advantages in accessing services or entertainment. It also involves covering travel, tourism, accommodation, food expenses, or similar expenditures, whether through cards, tickets, or any other forms of evidence, regardless of whether it's an advance payment or a reimbursement later on
Giving /receiving money, things, support	Giving/receiving money, items, souvenirs on various occasions or trade conventions to maintain good relationships between companies. and agencies involved
Bribery	Offering, promising, giving, or demanding benefits as an inducement for a person to do something that is illegal, illegal, contrary to good morals, ethics, laws, regulations, and policies, or destroys trust.
Bribe	Property or other benefits: Here, "property" means property and intangible objects that may have a price and may be held, such as money, houses, cars, "other uses" such as building a house or decorating a house. without charging a price or charging an abnormally low price Free home rental debt relief taking you on a trip
Entertainment and hospitality services	Expenses incurred on special occasions Traditional welcome service or trade regulations to maintain good relations between companies and agencies involved without expecting to receive services, rewards, privileges that are not in line with business ethics, such as providing food, drinks, or any services Whether it be performance, sports or various recreational activities. The cost of the entertainment may include accommodation and transportation fees for visiting the business premises. or study visits, etc.
Charitable donation	Giving money or things or any other benefits without expecting anything in return By an individual or legal entity or through an organization For charity and/or to assist any cause Donations can take many forms including offering cash, services, new or used items such as clothing, toys, food and vehicles. Donations may include emergency items. Relief or humanitarian assistance Support for development assistance and may refer to things necessary in medical care
Giving and receiving support	Items, subsidies, aid or contributions paid or reasonably received from customers, business partners, and business partners The objective is to support business operations. Brand promotion or the reputation of the company which is beneficial to building trade trust Help strengthen business relationships as appropriate to the occasion.
Political Assistance	Giving property, money, rights or any other benefits. To help or support or for any other benefit. to political parties, politicians, or persons with political responsibilities as well as political activities whether directly or indirectly
Facilitation Payment	The small expenses paid to informal service personnel are not intended as inducements for wrongful actions or delays; instead, they aim to ensure the completion of processes or to prompt faster action.

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Facilitation Payment (continue)	These payments do not involve the discretion of the service personnel but rather align with their duties. This encompasses actions that are rights granted to a legal entity by law, such as applying for licenses, requesting certificates, and accessing public services.
Providing compensation or other benefits	Giving things, privileges in the form of property The rewards are monetary or non-monetary. or any other benefits that have value, such as gift certificates, gift checks, price reductions, receiving entertainment, receiving services, receiving training, etc. as a gratuity, as a reward, or as a way to build a special relationship.
normally popular	Festivals or important days where gifts may be given and includes an opportunity to congratulate Expressing thanks, welcoming, expressing condolences or providing assistance according to etiquette that is practiced in society as well (Refer to the Regulations of the Office of the Prime Minister on Giving or Receiving Gifts by Government Officials, 2001)
conflict of interest /conflict of interest	Conflict between employees' personal interests and public benefit plans It is a situation or action that the employee performs and has personal benefits that affect decision making. or performing duties in the position for which that person is responsible and affecting the general interests of the company as well That situation may cause that person to lack objectivity in making decisions with transparency.
Hiring government employees (Revolving Door)	Hiring people who are or were government employees includes: Civil servants who hold political positions government official Local government employees who have a position or a regular salary Employees or persons working in state enterprises or government agencies local administrators and local council members who are not persons holding political positions Officials according to the law governing local areas including directors Subcommittees, consultants, and employees of government agencies, state enterprises, or government agencies and persons or groups of persons who Using power or being assigned to use the administrative power of the state to carry out any action according to law. Whether it is established in the bureaucracy, state enterprise, or other state enterprise
Whistleblowing	Giving information to the company that involves operations that are believed to have committed wrongdoing or behavior that is suspicious of wrongdoing from practices that are not legal or related regulations, fraud, corruption Giving bribes to government officials Including ethics and ethics in conducting business.
Complaints	Complaints / Suggestions / Comments / Compliments / Inquiries or requests for information
Stakeholders	Other individuals and groups (shareholders , employees , customers , partners , communities , government as well as the environment) that add value to the company or are interested in or affected by Company activities Aligning with the needs and expectations of stakeholders will support the company's sustainable success.


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Structure , Duties and Responsibilities Anti-Corruption



Duties and responsibilities in fighting corruption

- 1) Board of Directors holds the duty and responsibility to establish policies and oversee the implementation of a system that bolsters effective anti-corruption endeavors. Their role is to ensure that management is keenly aware of and prioritizes anti-corruption efforts in all aspects, fostering its integration into the organizational culture. Additionally, they are accountable for providing guidance, recommendations, and assessing penalties, while collaborating to devise solutions alongside the Chief Executive Officer and the Executive Board.
- 2) Audit Committee is tasked with reviewing financial reporting, accounting systems, internal control systems, internal audit procedures, and effective risk management systems. Additionally, it accepts reports of corruption involving individuals within the organization and conducts fact-checking to present such matters to the Board of Directors for collective consideration regarding punitive measures or problem resolution.
- 3) The executive team has duties and responsibilities to promote and support, Communicating the Anti-Corruption Policy to employees and all involved parties. Including reviewing the appropriateness of the system and various measures. To comply with changes in business, rules, regulations and legal requirements.
- 4) Internal audit department has duties and responsibilities to inspect and review operations to ensure that they are in accordance with policies, guidelines, and regulations. and related laws. To ensure that there is an appropriate and adequate internal control system to deal with corruption risks and to report to the Audit Committee regularly.
- 5) The working group has duties and responsibilities for communicating policies, guidelines regarding anti-corruption policies to all departments in the company and related people, following up and reporting to the committee.

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Anti-Corruption Policy


The company operates in accordance with the principles of good corporate governance, upholding business ethics and responsibility towards society and stakeholders. It is dedicated to combating all forms of corruption, aligning with international standards of good corporate governance and complying with legal requirements.

The company strictly prohibits directors, executives, and employees, including subsidiaries and associated companies, from engaging in, endorsing, or supporting any form of corruption, whether direct or indirect. This encompasses activities such as providing or accepting entertainment, hospitality services, gifts, property, or any other benefits to influence business transactions that could result in illicit gains. This prohibition extends to charitable donations and political contributions used to prompt inappropriate actions.

Guidelines

For clarity on activities that have a high risk of corruption. By the board of directors, executives, and employees of the company at all levels must comply with the Policy and not be involved in actions that cause corruption. Whether directly or indirectly, the company has set guidelines for directors, executives, and employees to adhere to as guidelines for their work as follows:

- Avoid engaging in transactions related to yourself that may cause conflicts of interest with the company.
- In the event directors or employees conduct transactions related to the company, the Company will handle them as external transactions. The involved director or executive must not partake in the approval process.
- Refrain from disclosing company secrets or internal information for personal benefit or the benefit of others, whether directly or indirectly.
- If a transaction presents a potential conflict of interest, the Audit Committee will evaluate and present any such transactions to the Board of Directors. These transactions, in compliance with Stock Exchange regulations, will mirror transactions with external parties (Arm's Length Basis), disclosing transaction details, value, reasons, and necessity.
- Report any observed actions considered as company-related corruption promptly to supervisors or designated individuals through specified channels. Cooperate in verifying various facts.
- The Company will act fairly and protect those who report or deny corruption, as outlined in measures to safeguard whistleblowers or cooperating individuals.

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Policy supporting anti-corruption measures and guidelines.

1. Giving or receiving gifts, souvenirs, entertainment or hospitality. or any other benefits

Policy

Directors, executives, and employees at all levels are permitted to offer gifts, souvenirs, or benefits based on tradition or appropriate occasions. These should be presented in a manner that enhances the company's image and fosters positive relationships between organizations. However, these gestures must comply with relevant laws and local customs. Importantly, they should not aim to influence recipients to act in a way that grants the company an advantage over competitors, prompts illegal actions, or violates the company's ethical standards.

Conversely, directors, executives, employees, and their families are prohibited from accepting or providing gifts, souvenirs, or benefits from customers, business partners, contractors, subcontractors, or any party attempting to induce actions inconsistent with ethical business practices. This includes any actions deemed incorrect or dishonest.

Acknowledging the significance of maintaining strong relationships with stakeholders, the company permits expenditure on entertainment and business hospitality services. This includes food and beverage entertainment, sports-related activities, and other related expenses that directly contribute to business practices or uphold commercial traditions. However, such expenditures should be reasonable and must not impact operational decisions or create conflicts of interest.


Guidelines

1.1 Giving gifts , souvenirs, or any other benefits

1.1.1 Giving Gifts and Souvenirs: Giving gifts or souvenirs based on tradition should comply with relevant laws and local customs. These offerings should enhance the company's image and that of its affiliates. Acceptable items include:

- A. Calendars, diaries
- B. Products manufactured by the company and its affiliates (Company Products)
- C. Products used as promotional materials for the company and its affiliates (Corporate Logo/Corporate Brand)
- D. Products from royal projects, community initiatives endorsed by royalty, products supporting charity or public benefit, or those promoting sustainable development within the company's operational areas and its affiliates.

1.1.2 Consistent Standards in Gift Giving: Maintain consistent standards in giving gifts and souvenirs to prevent any form of discrimination.

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1.1.3 Avoidance of Gifts to Relatives or Connections: Avoid giving gifts, souvenirs, or benefits to the spouses, children, or relatives of government officials, customers, business partners, or individuals in contact with the company, as it may be perceived as an attempt at substitution.

1.1.4 Permissible Occasions for Souvenirs: Offering souvenirs on significant business occasions, such as anniversaries, contract signings, or during visits to the company as a guest lecturer, is acceptable.

1.1.5 Approval and Documentation of Valuable Gifts: Gifts, souvenirs, or benefits valued at 2,000 baht or more require approval according to the Letter of Authorization (LOA). Additionally, they must be documented using the 'Form to Report Giving or Receiving Gifts, Souvenirs, or Any Other Benefits.' Keep records such as receipts and tax invoices for subsequent verification purposes.

1.2 Receiving gifts , souvenirs, or any other benefits

1.2.1 Prohibition of Accepting Gifts: Company personnel and affiliated entities are strictly prohibited from accepting gifts or any other benefits. It is their responsibility to effectively communicate this policy to external parties and refuse such offerings under all circumstances.

1.2.2 Handling Accepted Gifts: In exceptional cases where accepting gifts is necessary and cannot be returned, the recipient must promptly notify their line supervisor. They should document the receipt using the 'Report on Giving or Receiving Gifts' form and deliver the items to the Human Resources or Secretarial Department. Exceptions include:


A. Acceptance of pens, calendars, or diaries used for company promotion as personal gifts or for distribution to others.

B. Consumable items with an expiration date of less than 1 month, subject to the recipient's department supervisor's discretion.

C. When receiving gifts or souvenirs on behalf of the organization (e.g., during contract signings), recipients must report the acquisition using the 'Gift Reporting Form.' Approval and acknowledgment by line supervisors are required. However, such items must remain company property and be forwarded to the Human Resources or Secretarial Department for future use.

1.2.3 Gifts Received by Employees Working Abroad: Employees working abroad for the company or its affiliates must accept gifts if refusal is not an option. They should document these gifts using the 'Gift Reporting Form' and submit it to the Human Resources or Secretarial Department to create a written record, considering the received items as company property.

1.2.4 Disbursing Gifts from HR Department: When withdrawing or disbursing gifts or souvenirs from the Human Resources Department for alternate use, the requester must complete the 'Gift Reporting Form.'

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This form should request approval for distribution or financial support to responsible agencies and requires approval from a manager or higher authority.

1.3 Entertainment or hospitality services

- 1.3.1 Expenses from Entertainment and Hospitality Services: Expenses exceeding 2,000 baht require certification on the designated form, "Form to Report Giving or Receiving Gifts, Souvenirs, or Other Benefits." Approval must align with the company's approval authority table. When providing entertainment or hospitality, consider the appropriateness for the entertained party, the receiver of the service, or relevant third parties.
- 1.3.2 Approval Process: Applicants for approval must retain evidence identifying the supplier, such as clear receipts and tax invoices for entertainment and hospitality services for future inspections.
- 1.3.3 Compliance and Ethical Standards: Ensure compliance with legal regulations, adhering to good corporate governance policies, company ethics, and business ethics.
- 1.3.4 Approval Procedure: Applicants must prepare a detailed project plan outlining operational steps, including time, location, and budget details. Present this plan to the approver at least 7 days before the scheduled event for consideration.
- 1.3.5 Approval Consideration: Approvers should evaluate approval requests considering appropriate objectives, opportunities, and value before granting approval, following the authority manual (LOA).


2. Charitable donation

Policy

The company has a Policy to provide assistance. Donate to public charity organizations or provide support to various organizations for public benefit. The operation must be done on behalf of the company only.

Guidelines

- 2.1 Donations and support for project objectives. It must be proven that activities were carried out to achieve the project objectives and truly bring benefits to society or meet the objectives of operating with social responsibility.
- 2.2 In donating money or property of the company must be a donation in the name of the company only. By donating to charity. Must be a foundation. Public charity organizations, temples, hospitals, nursing homes, or organizations that have received permission from the government according to law to benefit society. with certificate or trustworthy. And there must be clear and reliable evidence of a donation request letter from an authorized person of that organization. And donations must follow the company's procedures.

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2.3 Those who wish for the company to join in donating have a duty to clearly assign someone responsible for the activities that receive donations. Documents reporting the results of projects or activities donated by the company are followed up and submitted as evidence after disbursement of funds. To ensure that the use of donated funds is not done for corruption.

2.4 Those wishing to have the company donate to charity Those with expenses of 2,000 baht or more must prepare a “ Donation or Support Approval Form ” to request approval for giving. By specifying the name of the support recipient Purpose and benefits of support and clearly specify the location of the activity where the financial support is used Along with attached supporting documents Submit for approval from supervisor. or the company's approval authority According to the operating authority manual (LOA) of the company and evidence of payment must be kept, such as receipts, tax invoices, thank you letters, and appreciation certificates so that they can be examined later.

2.5 Charitable donation both in the form of financial assistance or other forms such as giving knowledge or donating time, etc., the company can do this as part of activities to give back to society. as well as public relations and enhance the good image of the company without expecting business returns

2.6 Monetary donation will be done through the donor's bank account only.

3. Giving support

Policy

Support can be provided. and must be done on behalf of the company which must have a clear objective By giving support Whether it's money any other thing or form to any activity or project It must be done with transparency. It is legal and ensures that such financial support will not be used as a way to circumvent bribery. However, the support must be for the purpose of public relations. Promote the business and good image of the company This may take many forms, such as supporting cultural activities. Social and environmental activities Educational and sports activities, etc.


Guidelines

3.1 Those who wish to give the company give support It is responsible for inspecting individuals, juristic persons, funds, organizations, foundations, companies, stores, and recipients of all types of support that the company will provide. Before presentation to the approval authority According to the operating authority manual (LOA) of the company as follows:


3.1.1 Ensure that financial support is not used as a means of avoiding bribery.

3.1.2 In the case of a project It must be proven that actions were taken to support the achievement of the project objectives. The objectives of the project must be legal. Not contrary to morals and traditions and is not an inducement to act incorrectly in the performance of duties

3.1.3 Must ensure that such activities It has nothing to do with benefits. Rewards to any person or any agency except Announcement of honor according to general practice

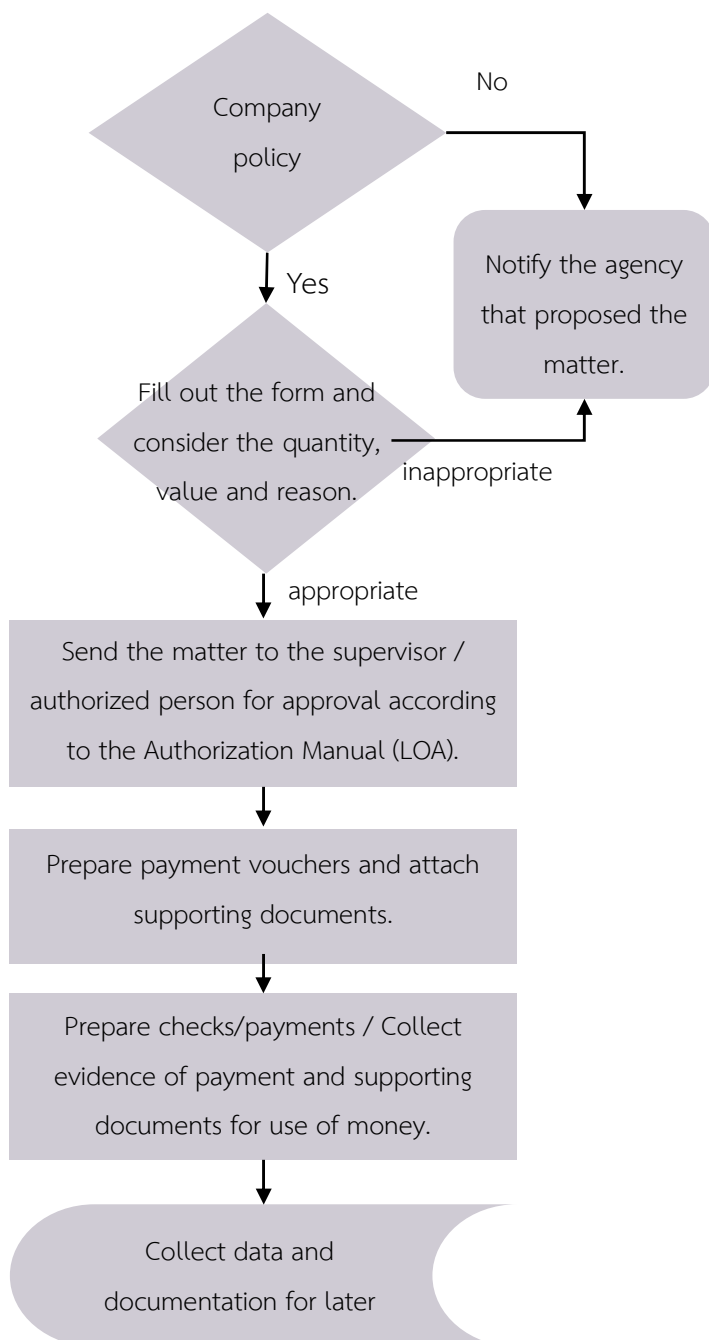
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- 3.2 Those who wish to give the company give support With expenses of 2,000 baht or more, a “ Donation or Support Approval Form ” must be prepared. The purpose must be for business. good image Business partners as appropriate for the occasion and reputation of the company However, the disbursement must specify a clear purpose and Evidence of payment must be kept, such as receipts, tax invoices, thank you letters, and appreciation certificates so that they can be examined later.
- 3.3 monitoring This is to ensure that support is put to public benefit. and/or truly meets the purpose of the donation and/or support. There is no hidden purpose. or to obtain business benefits that are strictly inappropriate
- 3.4 Gather support information realistically. For the benefit of analysis, planning and as internal information. Used in considering giving or not providing support in the future.


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The steps to follow include:

1. Giving or receiving gifts, souvenirs, entertainment and hospitality services. or any other benefits
2. Charitable donation
3. Support



1. The proposing agency evaluates whether the matter complies with company policies.
2. Recording giving or receiving transactions:
 - 2.1 Use the "Form to Report Giving or Receiving Gifts, Souvenirs, or Other Benefits" (for Case 1).
 - 2.2 Use the "Form Requesting Approval for Donation or Support" (for Cases 2 and 3). Assess appropriateness concerning quantity, amount, and reasons.
3. Propose to the supervisor or authorized personnel for approval, following the guidelines in the Authority to Proceed (LOA) manual.
4. The accounting and finance department reviews supporting documents attached to payment vouchers (if any).
5. The accounting and finance department submits the check to the authorized person for signing. Ensure correct evidence of receipt of funds is included.
6. Store all documents in either physical files or electronic formats within the Accounting and Finance Department. Enable the ability to search and verify historical data when necessary.

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4. Political assistance

Policy

The company strictly prohibits the provision of political assistance, including support to political parties, political groups, or individual politicians, whether directly or indirectly. Our stance remains neutral and non-partisan toward any political group. Those vested with authority to approve transactions must adhere to company regulations, which prohibit approval of transactions associated with political contributions.

Guidelines and procedures

4.1 The company upholds a strict policy of political neutrality in all business dealings and operations. We maintain a stance of impartiality and do not align with or support any particular political party.

4.2 The company refrains from providing any form of financial or material support to political parties, politicians, or candidates involved in political elections. Our primary focus is to pursue business objectives that benefit the company's growth and development.

4.3 Employees retain the constitutional right to engage in political activities, provided they adhere to pertinent laws and regulations. However, it is prohibited to misrepresent oneself as an employee or utilize company property, equipment, or resources for political endeavors. Any participation in political activities should occur outside of business hours.

5. Facilitation payment

Policy

The company has no Policy of paying facilitation fees to government or private sector officials.

Guidelines and procedures


5.1 The payment of convenience fees, which may potentially lead to corruption, is strictly prohibited and considered unacceptable within the company's policies and practices.

5.2 It is imperative to refrain from engaging in any activities that could involve the payment of facilitation fees. If any doubts, concerns, or questions arise regarding such payments, employees are encouraged to promptly inform their line supervisor for guidance and clarification.

6. Hiring government employees

Policy

The company adheres to a strict policy concerning the employment of government employees in positions such as directors, executives, employees, or consultants. There is a comprehensive selection process in place, encompassing employment approval, compensation determination, and stringent control

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measures. This process aims to guarantee that the hiring of government employees is solely based on merit and professional qualifications, devoid of any exchange of benefits that could compromise the company's integrity, reliability, or ethical conduct in carrying out their duties. Such measures are implemented to mitigate any risk of corruption and maintain a reputation built on honesty and trustworthiness.

Guidelines Procedures and control measures

6.1 The company has established stringent criteria for the selection of government employees. This includes a thorough selection process, meticulous employment approval procedures, compensation determination, and stringent control mechanisms. These measures ensure that hiring government employees is solely based on merit and professional qualifications, without any expectation of receiving benefits that could compromise independence in performing duties. Furthermore, the company upholds transparency by disclosing relevant information, enabling scrutiny for transparency and verification.

6.2 Applicants vying for government employee positions must provide disclosure of information and certify the accuracy of the information presented to the company. The company is committed to strictly adhering to laws governing personal data protection, as outlined in the B.E. 2019 regulations.

7. Conflict of interest/conflict of interest

Policy

The company strictly prohibits engaging in any financial or other associations that could potentially create a conflict of interest with its employees. Employees are expressly prohibited from assuming roles, whether as executives, directors, employees, representatives, or consultants, within partner companies without prior consent from the company's executives.


Elements of conflict of interest

A conflict of interest arises when the following elements are present:

1. A person occupies a position of responsibility or authority directly linked to departmental or public interests.
2. The situation involves personal interests that interfere with the individual's decision-making or exercise of discretion.
3. Decisions or actions are taken with the primary aim of personal gain, rather than serving the collective or organizational interests.

Guidelines and procedures

7.1 Directors and employees must refrain from actions that may lead to conflicts of interest with the company, its subsidiaries, or associated companies. They should not act in any manner contrary to the best interests of the company, its subsidiaries, or seek personal benefits that conflict with the company's interests.

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7.2 It is prohibited to utilize company secrets or information for personal gain or the gain of related parties.


7.3 If directors, employees, or related parties are involved or hold shares in businesses that might create an interest conflict or conflict of interest with the company, they are required to notify the audit committee or the designated responsible person in writing.

7.4 Any observed actions contradicting this policy should be reported through the whistleblower channel at IA@asiametal.co.th; Secretary@asiametal.co.th.

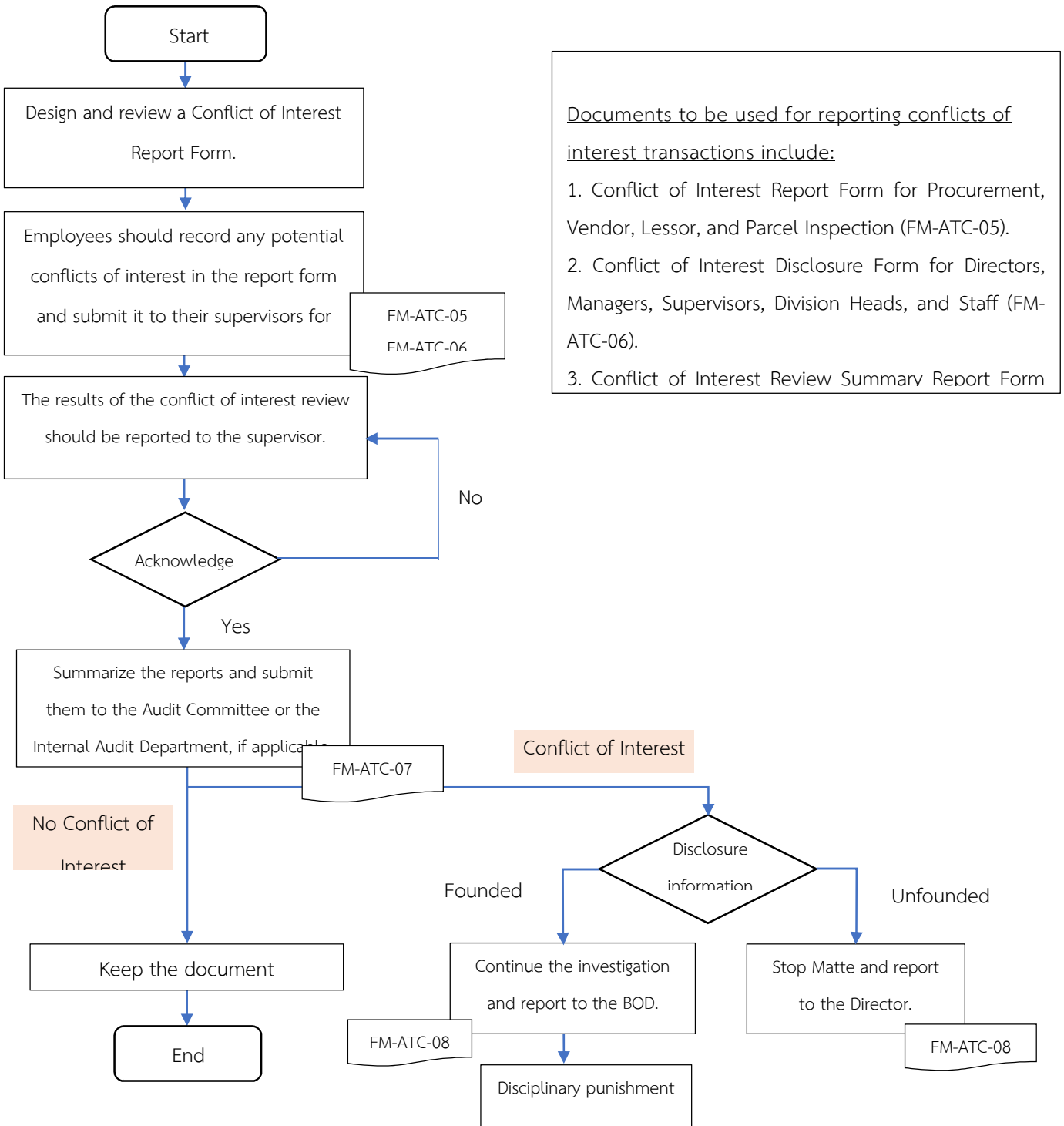
7.5 Conflicts of interest arise when employees' personal interests clash with the company's benefits or those of related parties such as customers. Such conflicts should be addressed and disclosed appropriately.

The principles to follow when an employee encounters a conflict of interest:

- Disclosure: Employees facing conflicts of interest should promptly disclose such conflicts to the Executive Committee and relevant company personnel responsible for the related tasks or matters.
- Withdrawal: Employees should refrain from participating in decision-making duties or tasks where conflicts of interest arise.
- Correction: If feasible, the employee should take measures to rectify the conflicting interests by altering the position or work duties involved. This might involve resigning from the conflicting position or task.

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Procedures for reporting conflicts of interest




Documents to be used for reporting conflicts of interest transactions include:

1. Conflict of Interest Report Form for Procurement, Vendor, Lessor, and Parcel Inspection (FM-ATC-05).
2. Conflict of Interest Disclosure Form for Directors, Managers, Supervisors, Division Heads, and Staff (FM-ATC-06).
3. Conflict of Interest Review Summary Report Form

case There are reports and complaints about conflicts of interest.

Go into the procedures for reporting clues and complaints. In the Anti-Corruption Policy document (AMC-ATC-001)

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8. Procurement

Policy

The company maintains a strict policy governing the procurement of goods and services, encompassing properties, materials, equipment, and employment-related general services. All procurements must have clearly defined objectives and require approval from authorized personnel according to established company procedures. For high-value procurements, the company ensures transparency and fairness by comparing prices from multiple vendors or service providers. The company unequivocally prohibits soliciting or accepting financial or other benefits from sellers or service providers. Goods or services received must adhere strictly to the agreed terms, specifications outlined in the purchase order, and meet the required standard quality. Deviation from these terms or substandard quality is not permissible.

Guidelines and procedures

8.1 All engagements or dealings with government sectors, public or private officials must adhere to principles of transparency and honesty. These interactions should strictly comply with relevant laws and regulations.


8.2 Procurement and purchasing activities must align with specified criteria or procedures outlined in procurement regulations. The process should be fair, transparent, and inclusive to all involved parties. Decision-making should consider factors such as reasonable pricing, quality, service standards, and adherence to various industry or environmental norms and standards related to the goods or services.

8.3 Suppliers or purchasers involved in procurement roles must not engage in any business practices that could result in personal benefits, whether directly or indirectly, due to their position in procurement or purchasing.

9. Affiliated companies Business representatives and partners

Policy

The company upholds a trade and investment policy aligned with business ethics and principles of good corporate governance. This policy is directed towards enhancing relationships with shareholders, stakeholders, and society at large. The company strictly prohibits the solicitation or acceptance of offers involving financial benefits or any form of dishonest gain from individuals or organizations. The company operates in compliance with laws and ethical standards, refraining from engaging in any activities that contradict legal regulations or ethical principles in the pursuit of business contracts or other advantages. Additionally, the company has established guidelines for managing contracts between the company and its affiliates, business representatives, and trading partners. These guidelines serve to:

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Conducting business with honesty and integrity

The company maintains a zero-tolerance policy towards corruption, exploitation, and embezzlement. Stringent monitoring and enforcement procedures are in place to ensure adherence to business ethics and prevent any form of corruption. Under no circumstances shall the company offer gifts, souvenirs, payment of fees, services, discounts, or any special privileges to employees of partner companies or their families to receive special treatment, except where aligned with local customs and not in violation of the law. The company strictly prohibits offering or providing anything of value, including money, bribes, entertainment, or any form of inducement to government officials involved in transactions related to the company. This policy extends to training directors, executives, and employees, reinforcing anti-corruption measures, and explicitly prohibits the payment of bribes for business benefits of affiliated companies, business representatives, and partners. Directors, executives, and employees are strictly forbidden from giving, receiving, or demanding anything of value, such as gifts, payments, or other benefits from affiliated companies, business representatives, or trading partners. Channels for reporting violations of these policies and guidelines are available for affiliated companies, business representatives, and partners to report any actions that contravene these policies to the company.

Business operations and fair competition

The company is committed to upholding fair business practices, advertising ethics, and fostering healthy competition while complying with all relevant regulations. Partner companies are expected to employ suitable methods to safeguard customer information and are strictly prohibited from engaging in the misuse of confidential information, price-fixing, bid-rigging, or any collusion aimed at reducing competition in transactions related to the company. The company aims to ensure that partner companies thoroughly comprehend and adhere to laws concerning fair competition and antitrust regulations.


10. Storing, accessing, recording, maintaining, and backing up financial information.

Policy

The company is dedicated to upholding standards concerning work systems and information technology. These serve as the cornerstone for establishing an effective control system. Our commitment involves ensuring the accuracy, completeness, transparency, and verifiability of financial information. Additionally, we prioritize the establishment of an efficient system for storing, accessing, recording, preserving, and backing up computer data, ensuring its availability for use at all times. Furthermore, the company strongly prohibits the misuse of data for personal gain or for the benefit of related individuals or entities engaged in businesses that directly or indirectly compete with the company.

Guidelines and procedures

10.1 Define Responsibilities: Clearly define the responsibilities of users and data custodians across all computer systems within the company's network.

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10.2 Risk Evaluation and Control Guidelines: Conduct risk assessments and establish guidelines to control risks to an appropriate and manageable level.

10.3 Information Security Measures: Implement robust security measures for safeguarding information within computer systems. These measures include preventing unauthorized access to data, ensuring an effective data backup system, and enabling the verification of documents and financial information when needed.

10.4 Compliance with Computer System Policies: Ensure that all operations related to information and communication technology systems adhere strictly to the company's policies governing computer system and network usage at all times.

Financial internal control measures and accounting document storage are crucial components within any organization.


1. The company strictly adheres to established standards, principles, and applicable laws concerning the reporting of accounting and financial information.
2. All expenses, regardless of type, must be supported by appropriate and verifiable supporting documents. These expenses require approval according to designated approval authority. The storage and maintenance of company data must fully comply with relevant laws and regulations.
3. The company prohibits the recording of false, unethical, incomplete, inaccurate, or manipulated information in its financial records. Moreover, the practice of maintaining off-the-books accounts, intended to support or conceal improper payments, is strictly prohibited.

11. Assessment of corruption risks

Anti-Corruption Committee Organizational corruption is responsible for presenting information on the results of corruption risk assessments. Conducting comprehensive assessments of corruption risks prevalent within various activities across the company, its subsidiaries, and associated entities. Identifying high-risk roles and activities susceptible to corruption, assessing their potential impacts, and delineating effective measures to prevent or minimize these risks. Implementing robust measures aimed at preventing and reducing corruption risks across the organization, regularly monitoring their efficacy, and evaluating compliance with these measures. Preparing detailed reports outlining the findings, progress, and effectiveness of anti-corruption measures for presentation to the Audit Committee on a scheduled basis.

12. Internal control and inspection of compliance with Anti-Corruption Policy

The company has established an encompassing audit process and an internal control system across its organizational framework, fostering a culture of good governance. This includes robust risk management practices and systematic reviews to prevent corruption within the organization, ensuring that no actions,

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whether giving or receiving, serve as conduits for corrupt activities. These measures span various departments such as sales, marketing, investment management, procurement, finance, accounting, data recording, human resources, authority delegation, and duty segregation. An independent internal audit department is established to evaluate the effectiveness of the internal control system, risk management processes, and corporate governance practices across the company's operations. The department conducts risk assessments encompassing financial matters and accounting processes, ensuring adherence to standards, principles, and relevant laws concerning financial reporting. The policy mandates that all expenses require supporting documentation, and data storage and maintenance are effective and aligned with objectives. Compliance with Anti-Corruption Policies and relevant regulations is strictly enforced. Moreover, certified public accountants scrutinize financial statements and operating results quarterly and annually to ensure accuracy, reliability, timeliness, and compliance with legal requirements. The Audit Committee oversees the company's internal controls, including reviewing financial reports and processes associated with Anti-Corruption measures, ensuring a robust governance framework and adherence to ethical standards.

13. Human resource management Training/Communication

This Anti-Corruption Policy extends to all facets of personnel management processes within the company, including recruitment, personnel selection, promotions, training, employee performance evaluations, and reward systems. Supervisors at every level are responsible for understanding and effectively overseeing the employees under their purview, ensuring efficient operations while maintaining control and supervision. The company maintains a fair human resource management process that safeguards employees who refuse or report corruption related to the company. Employees who report or refuse corrupt activities will face no demotion, punishment, or negative repercussions, even if such actions result in the loss of potential business opportunities for the company. Moreover, the company provides a secure channel for reporting suspicions or providing information related to corruption. It ensures a safe environment for whistleblowers, allowing employees to report information or seek guidance regarding compliance with Anti-Corruption measures without fear of reprisal.

13.1 Training

All employees undergo regular orientation, training, and meetings dedicated to the importance of combating corruption within the company. If an employee witnesses or possesses sufficient evidence to suspect corruption, they are urged to report it promptly. It is crucial that all employees comprehend the company's unwavering commitment to Anti-Corruption and recognize their pivotal role in this endeavor. Furthermore, the company strives to instill in its employees the belief that corruption is intolerable and

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cannot be overlooked. In the event of confirmed or suspected occurrences of corruption, employees are required to report these instances to the company immediately. This mechanism ensures swift action to halt and prevent further corruption, preventing the escalation of corruption-related issues within the company.

13.2 Communication and dissemination of Anti-Corruption policies


The company has communicated and disclosed various information. Related to the Anti-Corruption Policy to ensure that the company is an organization free of corruption, honesty, integrity, and transparent operations. can be checked The guidelines for communication and information disclosure are as follows:

1. Communication to directors, executives, and employees

- 1.1 The company has effectively communicated its Anti-Corruption Policy to all employees via email, the company website, the intranet system, and public relations boards. Additionally, it requires all employees to sign a "Letter of Acknowledgment and Consent to Comply According to the Anti-Corruption Policy." This ensures that employees have sufficient knowledge and understanding to earnestly implement the Policy.
- 1.2 Executives and new employees undergo orientation sessions to understand the company's Anti-Corruption Policy, emphasizing adherence to ethical standards and good corporate governance. The company's ethics and business ethics are explicitly detailed in the employment contract for executives or new employees, signifying their commitment to strict compliance.
- 1.3 Regular training sessions are provided to the board of directors, executives, and employees, aiming to impart comprehensive knowledge on Anti-Corruption measures, the company's expectations, and the penalties associated with non-compliance. These sessions are conducted on an ongoing basis to ensure continuous awareness and adherence to the Anti-Corruption Policy.

2. Notifying customers or business partners

- 2.1 Information regarding the Anti-Corruption Policy is prepared as part of the contractual conditions between the company and its customers, sellers, or service providers. This information aims to notify them of the company's stance on corruption from the commencement of their business relationship.
- 2.2 Documents are prepared to inform customers or business partners about the company's Anti-Corruption Policy, explicitly addressing issues related to corruption. This includes guidelines regarding the acceptance or offering of gifts, compensation, entertainment, and similar aspects.
- 2.3 The company has effectively communicated its Anti-Corruption Policy to customers or business partners through various means such as contracts, the company website, emails, and other

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pertinent channels. This ensures that these stakeholders are informed about the company's stance against corruption and its expectations regarding ethical conduct.

Notification has been disseminated to subsidiaries, associated companies, controlling entities (if applicable), business representatives, and all relevant stakeholders to ensure comprehensive awareness

1. The company engages in public relations by disseminating information about its Anti-Corruption policies through its website, annual information statement, and annual report.
2. The company designs various media or symbols to visually express its support for Anti-Corruption policies.

Reporting clues or complaints

Asia Metal Public Company Limited has instituted a Whistleblowing Policy, reinforcing its commitment to conducting business with integrity and adhering to the principles of good corporate governance. The company mandates transparent, cautious, and prudent decision-making processes to avert potential harm to its operations. The board of directors, executives, and all employees are expected to conduct themselves ethically and adhere strictly to prevent and eradicate all forms of corruption, whether occurring internally or externally. Any breaches or violations of ethical standards and codes of conduct in operations will not be tolerated

Duties and responsibilities

Board


Specify policies and guidelines at the end of the announcement. The Policy for reporting wrongdoing includes the implementation of the Policy in concrete ways.

Executives at all levels and secretaries

1. Set up an operational process and a designated channel to receive whistleblower reports, ensuring the inclusion of protective measures for whistleblowers. Report information clearly and appropriately by submitting it to the committee for review or approval, based on the specific case.
2. Disseminate the Policy outlining procedures for reporting misconduct to all company personnel. Foster awareness among employees to actively monitor and prevent corruption within the company. Ensure comprehensive communication of these policies.
3. Ensure that all employees acknowledge and understand the Policy and guidelines for reporting misconduct.

Operators and employees

1. Acknowledge and comply with this Policy.
2. Report any observed wrongdoing or any reasonable suspicion of dishonest acts to your supervisor or through the channels specified by the company.

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3. Cooperate by providing information or assisting relevant investigative agencies responsible for probing and substantiating the reported clues.

Measures for reporting clues or complaints

All stakeholders, including shareholders, customers, competitors, creditors, government entities, the community, society, executives, and employees, have the right to report any observed behavior by directors, executives, or employees that appears inappropriate or violates the company's ethics and business standards. They can voice concerns or report potential illegal activities, workplace misconduct, suspected fraud, or corruption. The Company pledges to impartially and transparently address all complaints, ensuring fair treatment and a specified processing timeline. Confidentiality is upheld, and safeguards are in place to protect whistleblowers and involved parties from any form of discrimination. The Audit Committee and Company Secretary are entrusted with receiving complaints regarding good corporate governance, company ethics, and business standards through official channels. This process enables the company to address and rectify any breaches of good corporate governance policies, company regulations, and ethical standards that could harm the company's assets and reputation, thereby fostering sustainability and development.

Measures to protect whistleblowers or complainants

1. Whistleblowers or complainants will receive adequate protection from the company.
2. Whistleblowers or complainants, along with related individuals, will be treated fairly and protected against any form of bullying. In cases where the company must disclose information, it will do so while considering the safety and well-being of the whistleblowers or complainants.
3. The company will ensure the confidentiality of whistleblowers' or complainants' information and identities. It will establish a secure database system and impose penalties on any officials responsible for the unauthorized disclosure of such information.
4. Access to the aforementioned database system will be granted only with permission from the Chairman of the Board of Directors, the Chairman of the Audit Committee, or an authorized Company director.
5. It is the responsibility of the supervisor or department head of any person accused of misconduct to exercise discretion and issue appropriate orders. This is aimed at safeguarding the complainant, witnesses, and individuals providing information during investigations, ensuring they are not subjected to any risks or unfair treatment due to their involvement in complaints, testifying, or providing information.

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Channels for reporting clues or complaints

Whistleblowers or complainants should provide detailed information about the matter being reported, including sufficient evidence for investigation. They are requested to clearly state their name, surname, address, and contact phone number (if desired). In instances where anonymity is preferred, reports can be submitted without disclosing the name of the whistleblower or complainant. These reports should be sent through the designated channels specified for receiving such matters:

- Company's comment box
- Company website : <http://www.asiametal.co.th>
- Notify via email at
 1. Audit Committee ia@asiametal.co.th
 2. Company secretary secretary@asiametal.co.th
- Notification by mail Sealed letter at

Chairman of the Audit Committee or Chairman of the Board of Directors or Company Secretary

Asia Metal Public Company Limited, Head Office

55 , 55/1 Village No. 2 Soi Wat Nam Daeng Srinakarin Road, Bang Kaeo Subdistrict, Bang Phli District
Samut Prakan Province 10540


Matters that receive clues or complaints

1. Violating the law, engaging in corrupt practices, or contravening the company's regulations and ethical standards is strictly prohibited.
2. Irregularities in financial reports or a flawed internal control system significantly impact the company's benefits and reputation.

Process and processing time when receiving a notification or complaints

The Company's Board of Directors has designated the Audit Committee to review and assess reported clues or complaints related to actions suspected of corruption or violations of ethics and business conduct, whether occurring directly or indirectly within the company. These reports should be submitted through the specified channels for receiving such matters.


Upon receipt of a complaint, the designated recipient is required to forward the complaint to the complaints manager within three business days. The complaints manager will then evaluate and categorize the information received from whistleblowers or complainants into 3 groups as follows

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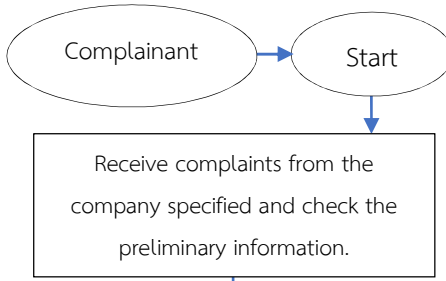
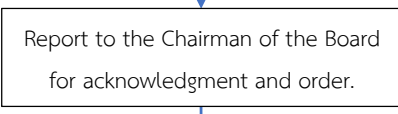
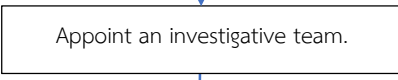
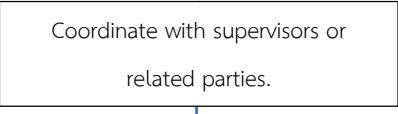
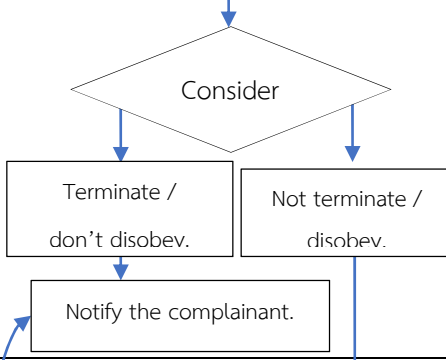
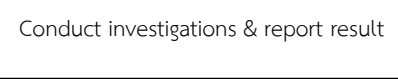

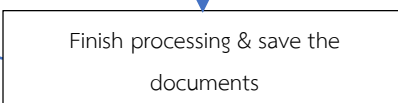
Procedure	Respondents (3 groups)		
	employee	executive	Director and/or the company
1. The Board of Directors or Audit Committee may take on the role of complaint handlers and may consider appointing an investigation team.	An investigation of the facts should be conducted within 7 working days from the date of receiving the complaint.		
2. Prepare a register to control complaints.	As soon as the Chairman of the Board approves the matter and issues instructions.		
3. Summarize the investigation findings and provide recommendations for disciplinary actions to the complaints manager.	<p>The investigation team is required to conclude its investigation within 30 days from the date of their appointment.</p> <p>If circumstances necessitate an extension beyond this period, the investigation team may submit a request to the complaints manager for approval, allowing for extensions of no more than 7 days at a time.</p>		


note :

1. Failure by the investigation team to complete the assigned tasks within the specified period, or failure to request an extension as mentioned above, will be deemed a violation of these regulations. The team must provide a written explanation to the complaints manager, detailing the reasons for the delay.
2. If the accused or complainant holds a position as a 'director, executive, employee, or member of the committee or sub-committee,' they are not entitled to attend meetings, engage in discussions, or access evidence related to whistleblowing or complaints until the investigation concludes.
3. All received information must be kept strictly confidential and disclosed only to the designated and involved individuals. Anonymity must be maintained for all whistleblowers or complainants in every case, without exceptions.

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Procedures for reporting clues and complaints

Process flowchart	period	Job description	responsible person	document
	3 working days from the date of receipt of the matter	- Audit Committee Receive complaints and conduct preliminary investigations regarding violations of ethics and business ethics/corruption/conflicts of interest)	secretary	FM-ATC-0 4
	2 working days from the date of receipt of the matter	Report basic information to the Chairman of the Board of Directors / Chairman of the Board of Directors.	secretary	
	7 working days from the date of receiving the complaint	- Define duties and responsibilities - Check information and place orders - Prepare a control register	Chairman of the Board of Directors /Chairman of the Audit Committee	Record the control register and summarize statistics
	30 days from the date of appointment of the investigation team	- Check the facts	Investigation team	FM-ATC-0 4 FM-ATC- 05
	If the specified period is exceeded to expand the investigation No more than 7 days at a time	- Consider facts and evidence received or witnesses. - Notify the complainant and related people. Including status and progress reports	Investigation team	FM-ATC-0 4 FM-ATC- 05
		- Report progress to the Board of Directors and the Audit Committee.	Investigation team	FM-ATC-0 4 FM-ATC- 05
		- Set penalties according to company rules, regulations, or laws.	Investigation Team / Human Resources Department	FM-ATC-0 4 FM-ATC- 05
		- Collect statistics, information and clues, including keeping documents secret.	- Investigation team - secretary	Record the control register and summarize statistics

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Violations and penalties Policy

The company places utmost importance on strict compliance with the Anti-Corruption Policy by all directors, executives, and employees. Any violation or failure to comply with this policy constitutes an offense and will be subject to punishment in accordance with company regulations and/or relevant laws of Thailand. Any breaches or non-compliance with this Policy, whether by directors or employees, will undergo investigation as per the disciplinary process. Depending on the severity of the violation, a warning, disciplinary action, or dismissal (if deemed necessary) may be issued. In cases of intentional violations or non-compliance, civil and criminal proceedings may ensue. Moreover, adherence to the Anti-Corruption Policy will factor into the evaluation of employee performance, determining rewards and promotions. Importantly, the company does not intend to demote, punish, or impose negative consequences on employees who refuse to engage in corruption, even if such actions lead to potential loss of business opportunities for the company

Monitoring and Review

The Board of Directors, executives, and all employees are mandated to acknowledge, understand, and strictly comply with the company's Anti-Corruption policies and practices. Executives across all levels hold the responsibility of ensuring adherence to these policies. It is imperative for every department's chain of command to disseminate, ensure understanding, and enforce compliance with Anti-Corruption measures among their respective teams. Instances of severe corruption by any director, executive, or employee will result in strict disciplinary actions. If any action is deemed to violate laws or regulations, the company may escalate the matter to government officials for further legal measures. The Board of Directors is assigned duties and responsibilities according to the organizational structure and is responsible for self-monitoring and reviewing their performance. Anyone with concerns about potential violations of Anti-Corruption policies or laws must report through specified channels for complaints and whistleblowing. Regular monitoring and annual reviews of Anti-Corruption measures and guidelines are mandated, especially when crucial changes impact risk management. These measures should align with Good Corporate Governance Policy, the Company's Code of Conduct, and comply with relevant regulations. Any improvements must be approved by the Board of Directors and communicated across the organization. The audit committee oversees compliance with Anti-Corruption measures, reviewing appropriate controls and providing guidance to the Board of Directors, executives, and relevant employees.