



# Anti-Corruption Policy

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SiamEast Solution Public Company Limited places significant importance on combating all forms of corruption by focusing on promoting integrity, building awareness, and fostering the right values in its operations. Therefore, the company has established guidelines for anti-corruption and communicated them to directors, executives, and employees to ensure understanding and strict adherence. Furthermore, the company has expressed its commitment to participating in the Thai Private Sector Collective Action Coalition Against Corruption (CAC) program and signed the acknowledgment of participation by the Chairman of the Collective Action Coalition on July 5, 2019.

## 1. Definition

Anti-corruption refers to any act of offering, promising, soliciting, demanding, giving, or accepting any property or benefits, directly or indirectly, from government officials or individuals doing business with the company, in exchange for performing or refraining from performing their duties to obtain or retain business-related benefits that are inappropriate, except where permitted by law, regulations, local customs, or business practices.

## 2. Anti-Corruption Policy

2.1. Directors, executives, and all employees, including subsidiaries, joint ventures, and any company under the company's control, as well as business representatives (if any), must adhere to the anti-corruption policy, corporate governance principles, and business ethics. They must refrain from engaging in corruption, whether directly or indirectly, and must not neglect or ignore any acts that may constitute corruption related to the company.

2.2. The company has established procedures for procurement, payment, or contract signing, where each step must be clearly documented, and approval authority must be appropriately and strictly defined.

2.3. The company has established an effective internal audit system covering financial and accounting aspects to ensure that financial transactions are conducted correctly, transparently, and are auditable.

2.4. The company has established principles for giving or receiving gifts, items, or entertainment that may raise concerns about potential corrupt behavior or bribery. Any gift received should be reasonable, and it should not be in the form of cash or anything equivalent to cash. All actions should be transparent and auditable.

2.5. The company has established channels for reporting any suspicious activities that may suggest corruption or misconduct by directors, executives, or employees. Whistleblowers can submit details and evidence through the company's website, email, or by mail.

2.6. The company ensures the protection of whistleblowers regarding corruption cases, maintaining confidentiality. If a whistleblower's identity is disclosed, those responsible for managing the information will face disciplinary action.

2.7. The company has established penalties for directors, executives, and employees who engage in corruption or support corrupt activities. Disciplinary actions may include written warnings, salary reduction, suspension, termination, or legal action.

2.8. There will be an internal audit and reporting process involving the chain of command, from the responsible person to the Risk Management Committee, the Audit Committee, the Management Committee, and the Board of Directors.

2.9. The Risk Management Committee will assess the likelihood and impact of corruption, covering various forms such as financial fraud, asset loss, corruption, violations of internal controls, alterations of important reports, and improper acquisition or use of assets

### **3. Guidelines for Practice**

The company has established the following guidelines for directors, executives, and employees to follow:

#### **3.1. Political Assistance**

Political assistance refers to any form of financial support, whether direct or indirect, for political activities. This includes providing goods or services, advertising in support of political parties, fundraising, or donating money to participate in various activities. The company does not support or encourage employees to engage in political activities, such as taking paid leave to participate in politics.

#### **3.2. Donations**

3.2.1 The company allows donations or gift-giving when it involves financial support or contributions to organizations or individuals within the framework of the CSR (Corporate Social Responsibility) guidelines.

3.2.2 Donations must be approved by authorized personnel as specified in the company's approval authority manual, according to the chain of command.

#### **3.3. Sponsorship**

3.3.1 The company permits the giving of sponsorship or financial support for promotional activities, sales projects, and advertising campaigns.

3.3.2 Sponsorship must be approved by authorized personnel according to the company's approval authority manual and the established chain of command.

#### 3.4. Giving and Receiving Gifts

To promote a corporate culture of transparency, honesty, and integrity, the company declares a "No Gift Policy." This policy aims to inform the public that all employees must refrain from giving, requesting, accepting, or agreeing to accept money, gifts, property, or any benefits from others for personal or others' benefit related to their duties. Additionally, employees should avoid actions that could affect judgment or decision-making in a way that might lead to conflicts of interest or unfair outcomes in their work. The guidelines include:

3.4.1 Do not give or receive gifts or benefits from stakeholders.

3.4.2 Use greeting cards, sign guestbooks, or send online greetings instead of giving gifts to foster good relationships between departments or individuals, or in accordance with customary practices.

#### 3.5. Hospitality and Other Expenses

3.5.1 Customer and partner hospitality, aimed at building business networks and fostering good relationships, must be reasonable in value and not exceed 5,000 Baht. If the value exceeds 5,000 Baht, prior approval from the immediate supervisor or top management is required.

3.5.2 The hospitality should not violate any rules, regulations, or laws, and should not create a conflict of interest.

3.5.3 All expenses must be reported to the immediate supervisor in writing, such as via email.

### 3.6. Reporting Violations or Complaints

3.6.1 If employees or stakeholders witness suspicious behavior or actions that may involve illegal conduct, corruption, or violations of company policies, they can report the matter or file a complaint through the designated channels.

Name	Job Title	Tel.	Email
Dr.Thanachart Numnon	Chairman of the Board / Chairman of the Audit Committee	089-6223486	Thanachart.num@siameastsolutions.com
Ms.Orasa Vimolchalao	Chief Executive Officer	081-8295306	Orasa.vim@siameastsolutions.com

Or send a letter to:

Whistleblowing / Complaints

SiamEast Solutions Public Company Limited

15/1, Highway Road Rayong 3191,

Huay Pong Sub-district, Mueang Rayong District,

Rayong Province, 21150, Thailand.

#### 3.6.2 Conditions and Considerations for Reporting and Complaints

- The whistleblower must provide their full name, address, and contact telephone number or email, as well as the name of the person or event being reported, in order to demonstrate sincerity, without any malicious intent or aim to harm others.
- The information received will be kept confidential, and the identity of the whistleblower or complainant will not be disclosed to the public without their consent.
- Whistleblowers and complainants, whether employees or external parties, will be protected.

- The duration of handling complaints will depend on the complexity of the issue and the sufficiency of the documents and evidence provided by the complainant, as well as the documents and clarifications from the person being complained about.
- The individuals responsible for receiving complaints and involved in the fact-finding process must keep all related information confidential and only disclose it as necessary, considering the safety and protection of the complainant or anyone cooperating in the investigation, the source of the information, or the persons involved.
- If the complainant or anyone cooperating in the investigation feels unsafe or may suffer harm, they can request that the company take appropriate protective measures, or the company may establish protective measures on its own if it deems there is a risk of harm or danger to the individuals involved.
- Those who suffer harm will receive appropriate and fair redress.

#### 3.6.3 Protection of the Rights of Employees, Workers, or Others Reporting to the Company

- The company will keep the information and identities of the complainant, whistleblower, and the person being reported confidential.
- If there is a need to disclose information, only the necessary details will be shared, with careful consideration of the safety and protection of the complainant and whistleblower.
- No employee will face any adverse consequences such as dismissal, demotion, disciplinary punishment, or intimidation for refusing to engage in corruption or for reporting with good intent.

#### 3.7. Human Resources

- The company will incorporate this policy and its practices into human resource management, including recruitment, training, performance evaluations, compensation, promotions, and informing new employees, who must acknowledge and sign the policy, to ensure they understand the importance of adhering to the policy.
- The company has structured its organization to separate duties that may facilitate fraudulent actions, setting appropriate approval authority levels and procedures.

#### 3.8. Communication

- The company will communicate the anti-corruption policies and guidelines to directors, executives, and employees at all levels to ensure thorough understanding and compliance. This will be done through various channels, such as employee training and internal communication systems.
- The company will provide channels for whistleblowing, complaints, or suggestions from the public and stakeholders through various channels, such as the company's website and annual reports.

### 3.9. Internal Control

3.8.1 Responsibilities to manage and control corruption, the company has assigned responsibilities in the following areas:

- The Board of Directors is responsible for setting the policy and overseeing the implementation of an effective anti-corruption system.
- The Audit Committee is responsible for the following duties:
  1. Consider and provide feedback on the monitoring of the implementation of anti-corruption measures and review the financial and accounting reporting system, internal control system, internal audit system, and risk management system, which are linked to risks that may arise from corruption.
  2. Receive complaints and whistleblower reports of fraudulent activities, both internal and external, involving company directors, executives, or employees.
- The Board of Directors is responsible for the following:
  1. Establishing a system and promoting the support of anti-corruption policies to communicate with all relevant parties.
  2. Reviewing the appropriateness of various systems and measures to ensure alignment with business changes, regulations, and legal requirements.
  3. Assisting the Audit Committee in investigating the facts related to any reports received.
- The Risk Management Committee is responsible for assessing the risk of corruption in the company's activities and overseeing the development of effective preventive measures to reduce these risks, including monitoring and evaluating results.
- All executives and employees must perform their duties in accordance with the anti-corruption policy. In cases of doubts or if a violation is observed, they must report it to their supervisors or through the channels designated by the company.

### 3.10 Monitoring, Reviewing, and Auditing:

- Directors, executives, and all employees are responsible for following up on the results of complaints and reports, and reporting to their supervisors or the Audit Committee as applicable, with a copy sent to the internal audit department.
- All levels of management are responsible for ensuring that employees under their supervision strictly comply with the policy.
- The policy will be reviewed every two years or whenever necessary to ensure alignment with the company's current business operations.

### 3.11. Penalties

- Individuals involved in corruption, whether directly or indirectly, will be subject to disciplinary action as per the company's regulations. Penalties may include written warnings, salary reductions, suspension, termination, and legal action, among others.
- The company reserves the right to review or terminate contracts or relationships with clients, partners, or stakeholders if it is found that they are involved in or have committed actions that violate this policy.