Anti-corruption Policy

SCG Ceramics Public Company Limited has uprightly conducted business by adhering to social responsibility and every stakeholder, in accordance with the good corporate governance and company's code of conduct, as well as the policy and guidelines of stakeholders. In 2018, the company joined Thailand's Private Sectors Collective Action Coalition Against Corruption in order to corroborate the intent against every type of corruption.

As a means to be the operational guidelines for business procedure and way to sustainable organization, the company has revised "The Anti-corruption Policy" that has been announced and upheld this policy to ensure that the policy, guidelines, and regulations are suitable for corruption prevention in every business activity. Also, the company will be able to make decision and deliberately analyze the case during business procedure that may lead to fraud risk.

Definition

Corruption is the inducement in any form by promising to give the property, money, and other benefits directly or indirectly for the government officials, government sectors, private sectors, or person in charge for their duty negligence that may lead to business preservation, business promotion for the company or other benefits that are not uprightly preserved unless the law, regulation, announcement, principle, local tradition, and trade custom allow to.

Personnel of the company mean Board of Directors, Administrators, staff, and subsidiary companies.

Subsidiary companies mean subsidiary companies regarding financial statements of the company.

Anti-corruption Policy

The Board of Directors, Executives and employees are strictly forbidden to undertake or accept any forms of corruption whether directly or indirectly. This policy applies to all affiliates and related subsidiaries in every country. The reassessment of the implementation of anti-corruption policy should be carried out periodically. Additionally, the policy framework and provisions should be reviewed regularly in order to response to the changes in business, rules, regulations, and laws.

Roles and responsibilities

- 1. The Board of Directors are responsible for policy specification and overseeing system that supports Efficient Anti-corruption Policy to ensure that the company's personnel place high priority on corruption prevention and organizational culture implantation.
- 2. Audit Committees are responsible for the reassessment of financial and accounting report system, internal governance system, internal audit system, and risk management system to ensure that those systems are in accordance with universal standard, which are circumspect, suitable, up to date, and efficient. Also, accepting corruption evidence that are rooted from company's personnel, assessing fact, and proposing the case to the Board of Directors for punishment or solving the case, consulting, and monitoring anti-corruption policy practices.
- 3. Administrative team and administrators are responsible for anti-corruption policy application by providing system and supporting this policy in order to communicate with staff and relevant accomplice. Also, reviewing the suitability of system and restrictions regarding business changes, rule, principle, and law regulation.
- 4. Audit supervisors are responsible for risk reassessment, restriction suggestion, and corruption risk prevention guidelines in order to propose to audit Committees and the Board of Directors. Moreover, Audit supervisor must audit and reassess the operation regarding the policy, operational guideline, authority, principle, law, and audit regulation

to ensure that the system suits for combating against corruption risk and audit committee report.

Operational guidelines

- 1. The company's personnel must comply with the anti-corruption policy and corporate governance without direct or indirect corruption involvement.
- 2. The company's personnel must not neglect when detecting any action regarding business corruption. The personnel must report to the supervisor or the person in charge and cooperate in the investigation. Also, consulting with the supervisor or the person who is responsible for the company's code of conduct monitoring via provided platforms.
- 3. The company must uphold justice and protect the complainants, personnel who reject or report corruption relating to the company, under the policy of protection for complainants or the person who gave evidence and cooperate in the corruption report regarding the Whistleblowing Policy that the company has provided.
- 4. The company emphasizes the importance of publishing and educating to build understanding of any person who involves with business operation or any action that affect the company according to the anti-policy compliance.
- 5. The company strives for organizational culture preservation that the corruption is unacceptable regardless of transaction with government or private sectors.
- 6. The company has provided the risk management committee to assess corruption risk that may occur in the future. The internal audit office has provided auditing process and internal management system that are suitable and efficient at auditing process, finance, accounting, and data collection, including the reassessment constantly.
- 7. The company has provided the policy, in accordance with the anti-corruption policy of Thailand or any country that the business is running.
- 8. The company will announce the guidelines regarding this policy for representative, counterparties, person on behalf of the company.

Regulation during operation

- 1. The anti-corruption policy includes the personnel management system: sorting, personnel selection, promotion, training, staff operational assessment, and remuneration by commanding every director to communicate and understand their staff in order to apply in business activity that they are responsible for and manage operation efficiently.
- 2. Any process regarding the anti-corruption policy must conduct under the guidelines provided in the code of conduct guidebook, corporate governance guidebook, policy, guidelines for dealing with stakeholders, principle, operational guidebook of related company, and other operational guideline that will be provided in the future.
- 3. As a means to clarify the operation during high corruption risk situation, the personnel must operate carefully, in accordance with the code of conduct and operational guidelines which are as follows:
 - 3.1 Providing gift and hospitality regarding the company's code of conduct.
 - 3.2 Donations or sponsorships must be transparent and legal. Also, donations and sponsorships must not be used for inducement.
 - 3.3. Facilitate Payment. Must not pay facilitation fee to government officers. The facilitation fee is the small expenses that are unofficially paid for faster operation without discretion. The action is considered to be the act of duty and legal rights.

3.4 Political Contributions

- (1) The company upholds the political neutrality by not contributing money to support political parties, political groups, political authority, political candidate directly or indirectly in every scale: local, region, or nation.
- (2) The company's personnel must strictly uphold the code of conduct in political aspects.
- 3.5 Revolving Door. Must not employ government officers that may lead to a conflict of interest.
- 3.6 Business relationship and government procurement. Must not offer or acquire inducement in all types of operations. Business operation and government contact must be transparent, sincere, and process in accordance with relevant law.

Communication and Training

- 1. The company provided anti-corruption policy publishing for personnel via different platforms: Committee and new staff orientation, Training or seminar, public relations in workplace via electronic system. Also, communicating periodically to educate every personnel about form of corruption, corruption involvement risk and whistleblowing procedure.
- 2. The company communicate and publish anti-corruption policy and complaints platform to the public, subsidiary companies, associated companies, and stakeholders via website, annual report, annual registration statement in order to build understanding and support corruption prevention.
- 3. In case, the personnel have any questions about this policy, they can ask the director, board secretary, or auditor.

Penalty

Any personnel, who conduct any action against the anti-corruption policy, will be analyzed for penalty, in accordance with the company's guideline. Moreover, that person will be punished by the law if that action is considered to be illegal.

Whistleblowing

The company has provided mechanism for complainants and the operation relating to any action against the law, regulation, code of conduct, or corruption of the company's personnel, including the restriction of protection for any person who gave evidence regarding the whistleblowing policy in order to be the clear guideline and be able to developing effective complaint system.