

Anti-Corruption Policy

Thantawan Industry Public Company Limited "The Company" has a policy to promote morality, ethics, and transparency by emphasizing on fair business practices to all relevant person in and outside of the industry which included shareholders, employees, customers, partners / creditors, competitors and society. The Company determines principles of unsupportive activities of a group or persons who act inappropriately in seeking for benefits in order to make sure that the operation will be carry out without corruption. Therefore, the Company has set up a policy to conduct the business and communicate to the Board of Directors, Chief Executive Officers, faculty of management and employees at all levels are strictly adhered not to perform or accept corruption at all, no matter in a direct or indirect way. Every relevant departments are comprehensive to review the implementation of anti-corruption policy regularly. As well as reviewing the guidelines together with the requirements for various operations. In order to comply with business changes, regulations and legal requirements.

1. Definition

1.1. Malpractices refers to an offense or deception with the intent of seeking personal gain by directors, executives and employees of the Company, customers, business partners or contractors of the Company, including the making of financial evidence and claiming false expenses. Using the Company's assets for personal gain and corruption.

1.2. Corruption refers to the use of power for personal gain, actions to obtain or maintain an unfair business advantage.

1.3. Bribe refers to an incentive or reward that is given, offered, or promised. Whether it is a financial benefit or any other benefit of any kind. This includes giving gifts or services, cash or things instead of cash or request for wrongdoing, whether it is any action in connection with public or private affairs.

1.4. Political contributions refer to help whether it is cash or other format to support political activities as well as promoting employees to participate in political activities on behalf of the Company without aiming for a commercial business advantage such as providing goods or services, advertising, or promotion or support a political party, buying tickets for an event to raise funds or donate money to organizations that have a close relationship with political parties, etc.

1.5. Giving donation/Receiving donation refers to providing financial assistance or other forms, such as giving knowledge or taking time to be a part of social giving activities, donate products of the Company as well as public relations for charity or public benefit and enhance a good image for the company by not aiming for business results in return, and does not create a conflict between personal interests and the interests of the Company which must prepare a memo for approval clearly state the purpose and name of the person or organization who receives the donation or receives support. Along with attaching relevant documents to present the company authority for approval before proceeding according to the Company regulations. Receiving donation refers to receiving in the form of cash, goods, assets for donation to charity.

1.6. Support refers to money paid to or received from a customer, partner or business partner. The objective is for the Company's business, brand or reputation, which is for the benefit of building trade credibility and helping to direct business relationships as appropriate to the occasion.

1.7. Giving gifts, Reception fee, Travel expenses and other expenses refers to giving gifts, reception fee, travel expenses and other expenses which do not affect the Company's operating results but it has to accordance with the relevant laws is given on behalf of the Company. Not on behalf of the employee which is suitable for festivals such as the New Year Festival, Songkran and Chinese New Year which is considered a normal custom and it has to be done with transparently.

1.8. Accepting gifts, property, bribes or any other benefits refers to accepting gifts, assets, bribes or any other benefits. This is not an action affecting the Company's operation but in accordance with relevant laws. As receiving in the name of the Company. If it is not on behalf of the employee, it is suitable for festivals such as

New Year, Songkran, Chinese New Year, which is a normal and open tradition including received because of the situation that cannot be denied or to maintain a good relationship with each other in business or for any other reason.

1.9. Government employees refers to a person who is or has been a government official / politician / advisor of a government agency and has come to work for a private company and may rely on internal relationships or information to benefit private companies or create a conflict of interest in the performance of duties of a government agency or business governing body with companies under the supervision. As a result, the action aims to create an unfair business advantage or formulate a private benefit policy that a former government official has worked for. In addition, a government official is a person holding a political position. Government officials or local employees with permanent positions or salaries Employees or persons working in state enterprises or government agencies local administrators and local council members who are not political persons Officials under the law on local administrative nature includes members of the employee subcommittee of government agencies, state enterprises or state agencies and a person or a group of persons exercising power or assigned to exercise the administrative power of the State in carrying out any act under the law. whether it is established in the government system, state enterprise or other state enterprise.

1.10. Partners refer to corporations, business partnerships, third parties, or any business related to person

1.11. Third party refers to a person outside the business partner or an agent who assists in dealing with government work or with business partners.

1.12. Conflicts of Interest refers to any situation or action or activity in which a practitioner has his or her personal or personal interests, whether by blood or otherwise, that affects a decision or performing duties in the position that the person is responsible for and impact on the common interests of the company as well That situation may cause the person to lack the fairness to make transparent decisions.

1.13. Convenience Fees refers to a form of payment or giving money to a government employee. To speed up the action or encourage the implementation of the normal procedure by which the process does not require the discretion of the State employee and is in the deed of that State employee. Including the rights that the juristic person should have under the law or to acquire a business advantage

2. Anti-corruption guideline and practice

2.1. The Board of Directors, Management Committee, and Employees do not perform anything related to corruption in all forms, both directly and indirectly.

2.2. The company prohibits directors, executives, and employees of the company from doing any act that is tended to be ccorruption. Such as, giving or receiving bribes to or from government officials, Government agencies, private agencies, or stakeholders related to the company. In order to gain or maintain business trade advantages and competition.

2.3. The company prohibits directors, executives and employees from demanding the operation or accepting corruption for the benefit of oneself, family, brothers, friends, and acquaintances.

2.4. The company has authorized the directors, executives and employees of the company must work carefully in the work process that has a high risk of corruption. Such as, Sales and procurement, marketing, investment project, contracting, giving and receiving gifts, Souvenirs or other benefits, Reception, giving donations, supporting funds, etc.

2.5. The company has authorized the directors, executives and employees of the company take actions on giving or accepting donations for supports in the right way. According with the company regulations and required by law ensuring that donations or financial support are not used for bribery.

2.6. The company has authorized the directors, executives and employees of the company cautious in making transactions with person, or any organization that is questioned about corruption.

2.7. The company prohibits directors, executives, and employees of the company from neglecting or ignoring when seeing acts that are considered to be corruption related to the company. Which is considered as duty to inform the director or the person in responsible. Be cooperate in examining various the truth.

2.8. The company will provide fairness and protection to those who have refused corruption or informing clues about Corruption to the company. As specified in the whistleblowing measures and mechanisms to protect whistleblowers. As well as the cooperators in the reporting of corruption. Regarding the specified Company's whistleblowing policy or complaint (Whistleblower Policy) with the Code of Conduct of the Company.

2.9. The company will consider and punish anyone that found implicating with corruption. Which is considered as unethical act according to the regulations of the employee's discipline. The person may be punished by the law if the act is illegal.

2.10 The company will disseminate knowledge and understanding, to anyone who must work with the company or may affect the company. In order to comply with the anti-corruption policy.

3. Operating requirements

In order to be clear with the operations of high-risk matters by the occurrence of corruption. All directors, executives and employees must act with caution in the following areas:

3.1. Political Assistances

3.1.1 The Company has a neutral business policy, not being politicized, politician or any political parties adhere to political neutrality, support legal compliance and democratic governance. The Company has no policy to support the activities of political parties or politicians directly and indirectly.

3.1.2 The Company has no policy to support the activities of political parties, politicians in exchange for special privileges direct or indirect disapproval benefits.

3.2 Charitable donations and support

3.2.1. Charitable donations both in the form of financial assistance or other forms. Such as giving knowledge or devote the time, etc. The company can be a part of social activities as well as public relations. It will enhance the good image for the company without aiming for business returns.

3.2.2. Giving money to supporting money or possession of cash substitution to activities or projects must be conducted with transparency legally and must specify the name of the provider in company's name. Going through compliance with the regulations of the company. Regarding the social organization and anti-social practices, such will not be used in criminal attacks. Community and society as well as public relations and company's image by creating various forms. Such as job creation, income, community, educating people in the prototype.

3.2.3. Any donations and support to government officials, government agencies including charities must perform under the following conditions;

- a) The organization is reliable and/or legally established
- b) It is an act on behalf of the Company which operates correctly under the law, the Company regulations and being transparent.
- c) It should not pay or offer cash substitute items to government officials, or directly to any persons unless it clearly stated in the request for support with a proof of support in writing.
- d) Monitoring should be done in order to ensure that donations or support has been spent for public benefit and/or meet the donation objectives and/or truly support.

3.2.4 Donation acceptance

- a) The Company has no policy to be a mediator in accepting donated money or assets in order to be donated to charities.
- b) The Company will notify employees about the lack of a policy to be a mediator in such matters.

3.2.5. The complaint requests the Company to provide financial support, donations and grants must do as follows;

- a) The complaint presents details of requests for reimbursement, granting, financial support, donations or grants to the supervisor for consideration.

- b) The authorised person considers the details of financial support, donations or grants to ensure that the objectives of providing financial support, donations and grants are in accordance with the company's practices then considers for approval. The complaint provides an evidence of financial support, donations or grants such as a letter from the organization that supports the donation or grants, photographs or receipts, etc., to the Accounting Department as an evidence for accounting records after providing a financial support, donations, or grants

3.3 Activity arrangement to Corporate Social Responsibilities

3.3.1. Activity arrangement of corporate social responsibility both in the form of financial assistance or other forms such as, providing knowledge, taking time to deliver products to support activities, environmental conservation, etc. The company can be a part of social return activities as well as public relations and enhance good image for the company without looking forward to business in returns.

3.3.2. Activity arrangement of corporate social responsibility together with government officials, government agencies or various organizations can be done as appropriate which must be done on behalf of the Company and it has objectives accordance with the Company's policy. It should have clear criteria and proceed plan regarding to the Company's regulations.

3.3.3. Conducting Social responsibility activities, whether by money or possession of cash instead. Must proceed with transparency, legally right, and must specify the name of the provider in the name of the company only. By going through the approval process in accordance with the company's regulations and make sure that social responsibility activities will not be used for corruption. Which may be done in many forms, such as creating jobs, creating income, including communities educating people in the community etc.

3.4 Accepting gifts, souvenirs or other benefits

3.4.1. The Company's employees refrain from accepting gifts, assets or other benefits in all matters as well as having a duty to inform the third parties about the anti-corruption policy thoroughly

3.4.2. In the event that it is necessary to accept gifts, assets or other benefits and cannot refuse, proceed as follows;

- a) Notify the supervisor immediately.
- b) The staff will prepare a gift slip, souvenir, and other benefits and send documents together with gifts, or souvenir to the department which is appointed by the Company as follows;

For the Factory at Omyai and Tuangtana Nakorn, it will be sent to the Human Resources Department or assigned person.

For the Head Office at Suntowers, it will be sent to the Chief Executive Officer's Office or assigned person.

- c) The responsible department takes photos of souvenirs, recording information, and attaches photos in the control registration of gifts or souvenirs to issue codes and attaches to the received items.
- d) The responsible department specifies the code on the delivery note of gifts, or souvenirs and document storage and those received items at the designated place.
- e) The responsible department delivers the control registration of gifts, or souvenirs to the Chief Executive Officer for acknowledging.
- f) The Chief Executive Officer considers the control registration of gifts, or souvenirs for appropriate use such as raffle gifts, or donations, etc.

3.5 Giving gifts, souvenirs or other benefits

3.5.1. Giving gifts, souvenirs or other benefits by traditionally can do without a violation of the relevant laws. Local customs should be provided in a form that promote the image of the Company. Products that promote sustainable development, or generating income for the community as follows;

- a) Calendars and Diaries
- b) The Company's products.
- c) Products used as public relations media of the Company.

d) Royal Project Products, the Royal Initiative, Community products that generate income for the community, or products that promote sustainable development.

3.5.2. Giving gifts, souvenirs, or other benefits should be equally treated in order to prevent discrimination.

3.5.3. Do not offer any gifts, souvenirs or other benefits to spouses, children or persons involved with government officials, business partners, value customers, and contacting persons because these behaviors are considered as acceptance instead.

3.5.4 Do not act as an intermediary in offering money, property, things or any other benefits to those involved with the business. Government agencies or any organizations in exchange for special privileges that should not be granted or cause government officials to refrain from following the rules, regulations, and legal practices that have been set forth

3.5.5 Giving gifts and property on important business occasions such as the founding day Signing a business contract can do. Yet, if the value of the gift, property, or any other benefit exceeds 3,000 baht (three thousand baht only), it must be approved by the Chief Executive Officer. or according to the company's regulations.

3.6 Guidelines on Conflicts of Interest

3.6.1 Directors, executives and employees avoid doing any connected transactions with themselves that may cause a conflict of interest with the Company, performance of duties and holding positions must not conflict with the interests of the Company, any decisions regarding the Company's business operations must be in the best interests of the Company.

3.6.2 Any actions and decisions of directors, executives and employees at all levels must be free from the influence of personal needs or of persons related to directors, executives and such employees. Either by blood or by someone who is personally known and use the fair and appropriate price as if transactions with outsiders. When deciding or approving an item that may lead to a conflict of interest, this will be reported the supervisor or participant in the approval and withdraw from participation in the transaction.

3.6.3 Executives and employees should refrain from operating in the same condition and compete with the Company's business or its affiliates, whether for personal or other interests, which may be damaging to the Company directly or indirectly, or to be a partner or shareholder who has the power to make decisions or executives in competitive enterprises or similar characteristics to the Company or its affiliates, unless it can be shown that there is a mechanism to ensure that such actions do not affect the Company and that measures are in the best interests of the Company and its shareholders as a whole.

3.7 Facilitation guidelines

The Company does not have a policy to pay for convenience. The facilitation payment is prohibited.

4. Whistleblowing and Complaint-filing

According to the corporate governance principle, the Company has provided reporting channel for clue notification or complaints, comments, or suggestions, which shows that the stakeholders who are affected or are at risk to be affected, which would cause damage to the all stakeholders from the business operations of the company, or from the directors' activities, executives or employees of the company about illegal activities or the violation of ethics. Including behaviors that may indicate corruption, unfair practice, lack of care and lack of prudence through the following channels;

1. By mail, Chairman of the Board of Directors or Chairman of the Audit Committee,

Thantawan Industry Public Company Limited

Address. 123 Sun Tower Building 32, Vibhavadi Rangsit Road,
Chomphon Subdistrict, Chatuchak District, Bangkok 10900

2. Email to the Chairman of the Board of Directors and Chairman of the Audit Committee
board-thip@thantawan.com

3. Company website: www.thantawan.com.

4. Suggestion box / comments / complaints within the Company. (The person who in charge is Chief Executive Officer).

These the company's channel for reporting clues as a safe channel and able to give clues to the person when requesting information, clues to the informer later, or instructions regarding compliance Anti-corruption measures.

In this regard, the company will conduct the examination according to the procedure and record the investigation in writing. Without disclosing the name of the whistleblower including the collection of complaints to protect the impact May occur with those who report such clues.