

Anti-corruption policy (Anti-corruption)

Sikarin Public Company Limited has been conducting business based on principals of fairness, good morals, honesty, transparency, strictly adhering to the social responsibility and each interested party, as well as supporting and promoting employees of all levels to accept attitude of resistance to corruption in all forms for sustainable growth of Sikarin. The Board of Directors has issued the Anti-Corruption Policy, whereas some subjects have been included in the "Business ethics and corporate ethics". Sikarin has issued this edition of Anti - Corruption Policy to define responsibilities and regulations of appropriate actions for resisting corruption in all forms.

In 2018, Sikarin joined the project on Collective Action Coalition Against Corruption that initiated by the IOD , the Thai Chamber of Commerce, the Joint Foreign Chambers of Commerce in Thailand, the Thai Listed Companies Association, the Thai Bankers Association ,the Federation of Thai Capital Market Organizations, the Federation of Thai Industries and Tourism Council of Thailand.

Definitions In the Anti-Corruption Policy

Corruption – means activities or any actions, such as giving or accepting, offering, requesting bribes, as in form of money, articles, property or any other benefits with a government officer, government office, or any person, engaged in business with the Company, both direct and indirect in order that the said person performs or chooses not to perform his/her duties in order to procure or to retain any benefits, which are inappropriate in business ways, except in cases when the law, regulations, announcements, rules, traditions and local customs or trade practices allow for such acts.

Political assistance – means providing money, articles, property of any other benefits as a means of help or support to a political party, a politician or a person, whose duties are relevant to politics, political activities, both directly and indirectly.

The Anti-Corruption Policy

The Board of Directors, Executives and Employees of Sikarin on all levels shall not commit any acts, related to corruption, both directly and indirectly, to themselves, their families, acquaintances, as well as to the government offices and private offices, which are engaged in business with the Company, and wish to have their actions verified and monitored continuously under this Policy in order to be in line with changes in business, rules and regulations of the Company and relevant Laws.

Duties and Responsibilities

1. It is the Board of Directors' duty and responsibility to consider, establish policies, control, monitor and verify the effectiveness of system, which supports resistance to corruption, so the Company may achieve the goals of implementing the Anti-Corruption policy.
2. It is the Audit committee's duty and responsibility to consider a Anti-Corruption policy, which is appropriate for the business, Company's environment, as well as to verify the appropriateness in amending the Anti – Corruption policy. Moreover, it is also the Audit committee's duty to re-examine the system of financial and accounting reports, internal control system, and corruption risk management in order to assure that various departments are working effectively and in accordance with the Law and the risks of corruption are minimal.
3. Managing Director, Executives and management division shall have the duty and responsibility of implementing the Anti – Corruption policy, conveying the Policy to the Employees of all levels and relevant persons in order to spread knowledge and understanding of the said policy, as well as verify the Policy's appropriateness and accordance with changes in the business, rules, regulations or requirements of the Law to further report to the Audit Committee.
4. Internal audit departments shall have the duty and responsibility to check and verify the work in progress, so that it conforms to the plan of internal control, in order to ensure the control system is adequate and to report the results of corruption risk management inspection to the Audit Committee.
5. Director, Executive and employee has a duty and responsibility to be responsible acting in accordance with this anti-corruption policy. In the event of any doubt or violation of the said policy, must report to the supervisor or through the designated reporting channels as determined by the Company. In case of serious issues affecting the Company's reputation, must report directly to the senior management and the board of directors directly (In case of urgent need).
6. In this announcement reporting in order of command or supervisor to uphold the hierarchy of supervisors according to the organization's organizational chart. In the case of Directors, notify the Chairman of the Board and in the case of the Chairman of the Board to notify the Board of Directors respectively.

Rule of Implementation

1. Directors, Executives and Employees of all levels, as well as relevant persons must act according to the Anti - Corruption Policy, Corporate Governance Policy, Business ethics and corporate ethics, as well as Company's regulations with utmost strictness, and must not get involved with corruption either directly or indirectly.
2. Sikarin's personnel must not commit any action, denoting corruption—give and accept bribes to and from any interested party for any work related issues, both directly and indirectly, in order to gain unjust benefits. Whereas the Company has established, that giving or accepting gifts, souvenirs, presents or any other benefits, must be done strictly according to established traditions and customs and inadequate and appropriate form, whereas the value must not be excessive or not to result in one's actions or abstaining from actions, which may result in corruption.
3. Donations for charity, either with money, articles, or property of Sikarin must be done in the name of Sikarin only, and must be given to trustworthy organizations, with proper licenses, and who can be traced back. Such donations must be done according to the procedure, established by the Company.
4. Supporting various projects with money, articles or property of Sikarin shall be done in the name of the Company only and must serve business goals, good public image of the Company and must be done according to the procedure, established by the Company. Thus any payments requests must state clear purpose and be supported by verifiable proof.
5. Employees of the Company must not commit any action, denoting them being not politically neutral, and it is prohibited to support or engage in any activities, denoting their bias to any political party, both direct and indirect, as well as to use Sikarin's resources for any politics-related activities, which clearly marks them as being not politically neutral.
6. Employees of the Company must not be indifferent, when discovering any activities connected with corruption related to the Company, and must report to the Superior or a responsible person as well as cooperate in investigation of any facts.
7. The Company shall provide fair treatment and protection to Employees or any other person, who reports any leads or provides evidence of corruption, related to the Company. According to the principles of appellant protection or protection of persons, cooperating in reporting corruption, the Company shall not penalize, demote or cause any negative consequences to the informant.

8. Person, engaging in corruptive activities, violates rules, regulations and corporate ethics of the Company and must be treated with according to the established disciplinary regulations of the Company, and if such actions are contradictory to the Law, shall be penalized by the Law as well.
9. Sikarin has arranged for corruption risks evaluation and has defined degrees of priority and appropriate measures, as well as monitoring and inspection of the said measures.
10. The Company has appointed Executives with the duties of monitoring, controlling Employees of all levels as well as related persons, especially Employees within the chain of command, so they know, understand and strictly adhere to the Anti-Corruption Policy.
11. Sikarin has conducted an assessment of corruption risk. Including prioritizing and determine appropriate measures, including monitoring the results of such measures. The risk management measures will be reviewed to be appropriate to prevent risks at acceptable levels.
12. Sikarin must provide an internal audit to ensure that the established risk management system helps the company to achieve its goals. Including checking the operations within the Company to comply with the rules, regulations.
13. Sikarin must provide this practical measure to be documented in accordance with internal control principles in order to comply with the Company's policies and regulations.
14. Sikarin requires executives to be followers, control to employees at all levels and related persons especially employees under supervision knowledge and understanding and strictly comply with the anti-corruption policy.
15. Anti-Corruption Policy to cover the personnel management process from recruiting or selecting personnel, reward and promotion, training, performance evaluation.
16. Company personnel, must sign to acknowledge the anti-corruption policy to confirm that all employees acknowledge, understand and are ready to adopt the principles in anti-corruption policy is a practice of operating with strictness throughout the organization.

Practice guidelines about political assistance

Giving money, things, assets or other benefits, to help or support political parties, politicians or people with political involvement, political activities, whether directly or indirectly both monetary or not monetary. Non-

monetary support includes lending donating equipment, providing technology services without charge, including advertising promoting or supporting political parties and / or encouraging employees to participate in political activities on behalf of the Company. The Company has preliminary guidelines for political assistance as follows.

1. Directors, Executives and employees at all levels must have political neutrality. Will not act as a supporter or provide political assistance to people related to politics, politicians, political parties or any political power groups in all areas, regions and at all levels.
2. Directors, Executives, employees and Employees of the group, have the right to freedom of participation in political activities personally under the provisions of the Constitution, relevant laws and regulations, but must not pretend to be a Director of the Company, an Executive or an employee, or use any assets, equipment, and resources of the Company for the purpose of doing in politics either directly or indirectly.
3. If the company wishes to provide political support to promote democracy such support must not conflict with relevant laws or actions with the expectation of receiving special rewards. In support, must provide a written record indicating the name of the sponsor and the purpose of support together with all supporting documents submitted to the Board of Directors for approval.

Guidelines for practice donate to charity

Charitable donations can be made by being a part of social contribution activities, and must strictly follow the guidelines for charitable donations and financial support, as it may cause the Company to risk corruption. Because such activities are related to spending money without a tangible return and may be used as an excuse or path for corruption and to prevent donations for charity, there are hidden objects. Therefore, must be taken carefully to ensure that charitable donations are transparent and in accordance with applicable laws and regulations of the Company about donations for charity as follows:

1. Directors, Executives and employees at all levels must have political neutrality. Will not act as a supporter or provide political assistance to people related to politics, politicians, political parties or any political power groups in all areas, regions and at all levels.
2. Donation, must have evidence showing that it has been done in order to support the project for charity or such public interest to achieve the objective. Which can show that there is a project for charity or such public interest actually happened and is beneficial to society.

3. Form of donation may be monetary, such as donations for disaster relief or donating things or any other benefits that are not monetary, such as donating school supplies to schools to support education.
4. Donation, will need to prepare a note sheet specify the name of the donor and the purpose of the donation and attach the supporting documents to the supervisor to approve according to the authority regulations.

Guidelines for financial support

Funds may be made for business, brand or reputation purposes for business public relations and enhancing the image of the Company. There may be risks due to payment for services or benefits that are difficult to measure and track. Therefore, must follow the guidelines on charitable donations and strict financial support, because it may cause the company to risk corruption, because such activities are related to spending money without a tangible return and may be used as an excuse or path for corruption and to prevent financial support from having hidden objects. Therefore, must be taken carefully to ensure that funding It is transparent and in compliance with applicable laws, including the company's regulations.

1. To provide financial support could be monetary or other benefits can be calculated in monetary value, such as accommodation and meals, materials and etc.
2. To provide financial support to the evidence showing that the requested funding. Have used such support funds to do activities in accordance with the project that has actually requested such financial support for the purpose of the project to be successful and is beneficial to society.

Guidelines on gifts welcome service fee and other expenses

The Company giving gifts, Hospitality or other expenses that are not suitable for customers. May bring risks to corruption and is a channel for corruption of Directors, Executives or employees of the Company as a bribe. In addition, it may be a violation of the policy of some customers or partners and cause the Company to lose business opportunities. The Company must realize the importance of building good relationships with business partners in order to bring which continued success of the Company. At the same time to maintain the reputation of the Company which engages in business with honesty and legitimacy Hospitality and other expenses as follows:

1. Directors, Executives and employees of the company can receive or give gifts, Hospitality or other expenses. Can be used in various occasions according to tradition, tradition or according to general social etiquette, such as entertainment must be conducted with transparency and not concealing hidden. By accepting or giving such information must not cause any advantage through improper actions or is a clear or hidden exchange In order to obtain help or benefits or cause consent in the improper business agreement affecting business decisions and must comply with the relevant laws. In

giving the gift of that company Must be given in the name of the company, not on a personal name Which may be made into a gift with the company's logo Or attach a business card with the company's seal Which is suitable for situations such as giving gifts during the New Year or Songkran festival, etc., which must not be in the form of cash or cash equivalents such as checks, gift cards or vouchers, etc. except in the form of sales promotion. Which has clearly defined criteria and act in the same way as everyone.

2. Directors, executives and employees must not accept any gifts or compensation which is unreasonable due to normal duties, such as in the tender must not accept gifts or service fees welcomed by companies participating in the tender or related companies, etc.
3. Directors, Executives and employees must not demand or receive gifts, Hospitality or other expenses from customers or any person involved in the business of the Company. In any case which may have an impact on the decision to perform the duty with bias or distress or conflict of interest.
4. Giving and receiving other benefits, such as party entertainment must ensure that the certification does not have the appearance of spending too much money or is often done until creating an obligation with those who manage the party to endorse it, whether directly or indirectly
5. The Company, will publicize the Company Directors, Executives and employees to know about the guidelines regarding gifts, Hospitality and other expenses of the Company through the annual meeting and through other communication systems that the Company has, including informing customers, partners or those involved with the business of the Company. To the policy and guidelines for the practice of gifts, Hospitality and other expenses of the Company through the company recommendation document.

Measures taken by companies and related persons

1. The Company will inform and arrange public relations to the subsidiary company to adopt anti-corruption measures to be implemented strictly.
2. The Company will arrange to buy products and services with fairness and transparency. Include evaluating the selection of vendors, service providers and contractors strictly in accordance with the procurement regulations. Anti-Corruption measures of this Company.
3. Directors, Executives or employees are prohibited from hiring any agent or business intermediary, by with the objective of conducting corruption.
4. The Company will cancel purchasing and hiring. If found that the seller, service provider, including the contractor acts corruption or bribery

Channels of Submitting Complaints and Filing Evidence (Whistle-the Blowing with Service).

Sikarin has established channels for submitting complaints and filing evidence, to receive any complaints, suggestions, proposals, and comments from any interested parties, who were affected or under

risk of being affected by corruption activities of Sikarin's Employees, both direct and indirect. The Board of Directors has appointed the Audit Committee to investigate the submitted complaints and verify the evidence of corruption. The person, who wishes to file a complaint, may deliver the complaint or the evidence along with his name, address and contact phone number via following channel:

- Company Secretary
Sikarin Public Company Limited
976 Lasalle Road, Bangna Tai, Bangna, Bangkok 10260
- E – Mail: ir.sikarin@gmail.com
- Telephone: 0 – 2366 – 9900 ext 2702
- Fax: 0 – 2366 – 9907

Measures of Protection of Persons, Submitting Complaints or Providing Evidence

Sikarin shall keep complainant's data confidential, and restrict access to them only to persons, responsible for investigation of the said complaints. If the complainant or person, providing evidence, is the Sikarin's Employee, he/she will be treated fairly and appropriately, i.e. he/she will not be demoted, laid off, dismissed, threatened or otherwise unfairly treated.

It is the Managing Director duty to appoint an Executive at their discretion, who is a non-interested party in the issue, which has been reported or where evidence was submitted, both directly and indirectly, to represent and at his discretion to order security measures for the complainants, witnesses and informants.

To convey this the Anti-Corruption Policy to all of the Sikarin's Employees throughout, the Company distributes this Policy through Sikarin's media channels, such as Intranet (Company's internal communication channel), Company's website, 56-1 Form and Company's annual report (56-2) as well as informs new Employees about this Policy, thus the Company shall re-inspect the Anti-Corruption Policy on annual basis in order to be in line with the changes of the business.

Communication measures and information disclosure regarding anti-corruption measures to related parties

- **Data communication**: Through the management meeting notification via the public relations Board website annual report or other methods as appropriate related to anti-corruption measures. For employees, Executives, subsidiaries, shareholders, customers, partners, all stakeholders and those involved in the business have been informed
- **The disclosure**: Through the annual report, the website of the Company or other methods as appropriate to make sure that the Company and subsidiaries With transparent operations can check with employees, Executives, shareholders, customers, partners, all stakeholders and related parties as follows:

1. The company will announce to all employees to acknowledge. Which will be published via the company's intranet , including brochures or announcements for general distribution and the preparation of various media that represents the anti-corruption policy for all departments to be informed
2. Directors, Executives and all employees of the Group will receive training or acknowledge the ongoing anti-corruption policy especially the form of corruption. The risk of being involved in corruption, including how to report in case of sight or wondering whether corruption will occur. The knowledge training will be part of the new employee orientation. To create knowledge and understanding in implementing policies and penalties for violating policies
3. Publish policy Anti-corruption for shareholders Third parties or those interested in the following channels
 - Annual Disclosure Report Form 56-1 and Annual Report
 - <http://www.sikarin.com>
4. Make a document informing all customers and partners to communicate the policy on receiving / giving gifts, giveaways, customer reception, providing partners certification, receiving / giving compensation, etc. By doing during various festivals or business opportunities.

Human resource management practices

The company pays attention to factors related to personnel management and will carefully consider the selection, training, performance evaluation promotion or reward as well as providing various rewards to employees. Which the Company will consider strictly against corruption. By educating the Board of Directors, Executives and employees about various policies and measures related to anti-corruption. It is included as part of the orientation staff the company. The Company will inform employees of various measures that employees must comply with penalties, if there is a violation. As well as ongoing training on anti-corruption policies in order for employees to fully understand about the company's anti-corruption.

Internal audit and control measures

Require the Compliance and Audit Department to prepare the audit plan at least once a year. The audit plan will be approved by the Audit Committee. By considering the plan according to the risk that causes corruption. In order to ensure that the operation of the Company is appropriate and efficient, in accordance with relevant laws and regulations of the authorities and in order to reduce the risk of corruption. Therefore has an internal audit system to ensure reasonable confidence that existing internal control systems can help the company achieve its goals by determining the audit report process and reporting urgent issues as follows:

1. The Audit department must report the audit results and issues found at least once a year to the Audit Committee and inform the relevant parties.

2. After the inspection report must discuss internal control results In order to find suitable internal controls.
3. If found to have urgent issues the inspection department will notify the Chairman of the Audit Committee immediately.
4. The Audit Committee will be responsible for reporting the audit results to the Board of Directors.

Guidelines for recording and maintaining data

The Company sees the importance of Good Corporate Governance to demonstrate transparency and prevent the exploitation of personal information from the use of internal information. Therefore making a policy to prevent securities trading using internal information to follow the principles act and laws related to the use of internal information in accounting and finance. In order to comply with standards, including applicable laws regarding accounting and financial reporting. All expenses must be accompanied by supporting documents, including the storage of company information must comply with relevant laws and regulations and does not allow the recording of false, false, inaccurate, inaccurate or incorrect data. Including having no account outside the financial statements to support or conceal inappropriate payments.

Guidelines for the punishment process

The company will take disciplinary action against Directors, Executives and employees who violate the anti-corruption policy. With disciplinary action up to the point of leaving the job and / or terminating from being an employee, not being aware of this policy and / or related laws cannot be used as an excuse for not following this policy.