

Fraud and Corruption Risk Assessment Policy



Sikarin Public Company Limited

Fraud and Corruption Risk Assessment

Sikarin Public Company Limited (the “Company”) has conducted its business with fairness, morality, honesty, transparency, and adhering to social responsibility and all groups of stakeholders as well as supporting and promoting personnel at all levels in the Company and have conscience in resisting corruption all forms of corruption for the Company has sustainable growth. The Board of Directors has therefore established an anti-corruption policy. Some of the content has been written in “Business Ethics and Organizational Ethics” that the Company has prepared. This Fraud and Corruption Risk Assessment Policy has been created to define responsibilities and guidelines for appropriate actions to combat all forms of corruption.

Objective

The Company has created a written risk management policy with the objective of

1. Define various activities and procedures. To provide guidelines for the Company's personnel to use for preventing, detecting, and responding to corruption risks.
2. Specify the duties and responsibilities of the Company's personnel in each job position: To determine the duty of protection detect and respond to corruption risks. Be clear and according to good practice. This is to show commitment and promote an organizational culture that is aware of the organization's corruption risks.
3. Set guidelines to be in line with the Company's anti-corruption measures. So that its personnel. The Company is able to prevent, detect, and respond to corruption correctly and in a timely manner. In case of doubt or found acts related to corruption.

Scope of the corruption risk management manual

Manual “Manage this corruption risk” has been approved by the Board of Directors. It is defined as a guideline for preventing, detecting, and responding to corruption. That will cover the operations of the Company's personnel and serve as guidelines for all Company groups, including the Board of directors, sub-committees, executives and employees at all levels of the Company and all subsidiaries in the group of companies as well as people involved in the Company's business operations.

In this regard, the Company communicates the operating manual and related measures to the Company personnel and subsidiaries including communicating policies and measures to outsiders (Business stakeholders and the public). The Company’s employees at all level has a duty to study and understand the content including following the policies and manuals to perform work and such measures strictly.

Definition of corruption

The definition of corruption refers to an intentional act to seek unlawful benefits for oneself or others (such as family members, relatives, etc.). Corruption can be divided into: There are 3 types as follows:

1. Misappropriation of assets refers to any act that leads to the illegal possession of Company's assets or causes the Company to lose property.
2. Fraud in reporting means the correction of various reports. Whether it is a financial report such as a financial statement, financial record or non-financial reports to conceal misappropriation of assets or inappropriate actions or to benefit oneself and others which results in financial statements financial records or various reports of the Company is not correct according to reality.
3. Corruption means any practice or action such as giving or receiving, presenting, demanding, or bribing, whether in the form of money, things, or property, such as receiving or giving a bribe, political assistance, charitable donations, financial support, gift fees, hospitality fees, convenience fee and includes other expenses or any other benefits with government officials' government agency or persons doing business with the Company whether directly or indirectly. To allow such persons to perform or refrain from performing their duties to obtain or maintain any other inappropriate business benefits. Except in the case of laws, regulations, announcements, regulations, local customs and traditions. or trade customs can be done.

Political assistance means giving money, things, assets, or any other benefits to help or support political parties, politicians, or people with political responsibilities. political activities Whether directly or indirectly

Therefore, the definition of "corruption" covers the misappropriation of assets, reporting corruption as well as act of corruption.

Responsibilities

The Company's directors, executives and employees at all levels must strictly comply with the corporate governance and business ethics manual of the group, including this corruption risk management manual and will not do anything related to corruption, both directly and indirectly to oneself, family, acquaintances, including government agencies and private agencies with which the Company does business. and to regularly review and review compliance with the corruption policy. To be consistent with changes in the business, rules and regulations of the Company and related laws. To jointly manage corruption risks as follows:

1. Board of Directors Has a role, duties and responsibilities in considering, setting policies, supervising, monitoring and reviewing to have a system that supports effective anti-corruption efforts so that the Company Achieve the objective of implementing the anti-corruption policy as follows:
 - Leading the way in demonstrating commitment to combating corruption and fraud to show the position to the Company so that related business, people, and the public is informed
 - Define and assign duties and responsibilities for corruption risk management including other processes related to anti-corruption measures such as whistleblowing, investigation, assessment corruption risks, etc., to sub-committees, working groups, and executives with experience, knowledge, ability, and qualifications to perform their duties.
 - Disclose information to the external auditor about the role of the Board of Directors in managing corruption risks.
 - Follow policies or measures related to corruption risk management and anti-fraud and corruption.

2. Audit Committee has a role and responsibility in considering anti-corruption policies to be appropriate for the Company's business and environment, including reviewing the appropriateness of changing the anti-corruption policy. In addition, the Audit Committee is also responsible for reviewing the accounting, financial reporting systems, and internal control systems, fraud risk assessment to ensure that various agencies that the system is working efficiently. It is legal and has the least risk of corruption as follows:
 - Review for the Company process for preparing and disclosing information in the Company's financial reports to be accurate, complete, reliable, and timely, with coordination with the auditors and executives responsible for preparing both quarterly and regular financial reports. year.
 - Review for the Company there is an appropriate and effective internal control system and Internal Audit.
 - Review the Company's practices to be in accordance with the law on securities and stock exchange, conforms to the regulations of the Stock Exchange of Thailand and laws related to the Company's business.

- Consider, select, and propose appointment of the Company's auditor, taking into account reliability and experience of personnel assigned to audit the Company's accounts.
 - Consider disclosing Company information if a connected transaction occurs or items that may have conflicts of interest to be accurate and complete.
 - Prepare a report on corporate governance of the Audit Committee and disclose it in the Company's annual report. Such report must be signed by the Chairman of the Audit Committee.
 - Review the internal audit plan of the Internal Audit office to cover the review of controls Internal operations according to anti-corruption measures and various policies related as well as the risk of corruption in other operational processes.
 - Review the accuracy of reference documents and self-evaluation forms regarding anti-corruption measures. of businesses according to the Thai Private Sector Collective Action Coalition Against Corruption Project.
 - Receive reports on corruption, such as reports on corruption on a regular basis, urgent reports about serious corruption, investigation results and penalties, etc.
 - Consult with external auditors in cases where the Company experiences significant fraud.
 - Perform any other actions as specified by the Company's Board of Directors. Assigned with the approval of the Audit Committee.
3. Managing Director and executives have a role and responsibility in implementing the anti-corruption policy, communicating to employees at all levels and related parties. To have knowledge and understanding of the said policy including reviewing the appropriateness of the policy to be consistent with changes in business, regulations, or legal requirements to report to the Audit Committee.
- Support and create values in resisting fraud and corruption throughout the Company.
 - Provide procedures/work manual and appropriate internal controls in responsible processes and sufficient to prevent corruption.
 - Assign responsibility for overseeing the corruption risk management framework/policy to personnel/ Working group with knowledge, ability and experience including allocating sufficient time to those personnel to carry out tasks as assigned.
 - Help prevent and investigate actions suspected of corruption by organizing a process for examining the history of suppliers. To check the history of financial reliability to prevent risks that may occur.
 - Review policies, guidelines and scope of risk management to cover corruption.
 - Organize a corruption risk assessment at least once a year. By assigning experienced personnel who have the knowledge, abilities, and qualifications to be an operator.
 - Report on corruption risk management results including reporting various corruptions to the Board of Directors and the Audit committee.

4. Anti-Corruption and Corruption Working Group (consisting of representatives from various departments) is a working group for anti-fraud and corruption operations within the organization. This includes collecting fraud-related risks from risk owners as well as following up on operations and communicating various information Regarding fraud and corruption in the Company, the Anti-Corruption and Corruption Working Group has the following main duties:
 - Responsible for reporting and coordinating with the Board of Directors and/or agencies assigned by the Board of Directors. Regarding anti-corruption and corruption risk management of the organization.
 - Facilitate the corruption risk assessment process
 - Review policies, procedures and processes related to anti-corruption and Corruption and corruption risk management. To ensure that the specified actions are carried out completely and efficiently.
 - Communicate the requirements of anti-fraud and corruption and corruption risk management to the Company's personnel.
 - Serve as a central coordinator and provide advice on operational processes or other matters related to anti-corruption and corruption Assessment and management of corruption risks.
 - Provide information when there are issues related to corporate fraud risk or there is a risk of new corruption issues arising.
 - Follow up to ensure that each line of work has adequate anti-fraud and corruption prevention and corruption risk management and to be informed of various events which is a significant corruption risk. To achieve efficient and rapid management.
 - Follow up on progress in risk reduction activities and measurement of corruption risk indicators.
 - Follow up on compliance with the Company's anti-corruption policy.
 - Report the results of the corruption risk assessment to the management team and the Board of Directors.
5. Internal audit department, It is an independent and neutral agency, have a role, duty and responsibility in inspecting and reviewing operations to be in accordance with the internal audit plan. This is to ensure that there is an appropriate control system in place and present a report on the audit of the risk assessment regarding corruption to the Audit Committee.
 - Review policies, procedures, and processes for managing corruption risks to ensure that they are carried out as specified in a complete and efficient manner.
 - Assess the internal control of each process to cover the risk of corruption and when abnormalities are detected, it must be assumed whether the incident was caused by corruption or not.
 - Provide support to the investigative committee by giving advice and sharing information.
6. Human Resources Department: Its duties are to combat fraud and corruption and manage corruption risks as follows:

- Create guidelines and communication channels to raise awareness among Company personnel about ethics, corruption risk management and anti-corruption Including providing training to increase knowledge, ability for personnel to have sufficient potential to prevent corruption in their work.
 - Check the history or reliability of qualifications and abilities. Including the work history of personnel in important positions before signing employment contracts. This is to ensure that such persons do not have any issues with honesty in their work.
 - Provide an employment contract or work regulations of the Company. There are also conditions and regulations regarding corruption as part.
 - Set ethics and anti-corruption as one of the indicators to evaluate the performance of the organization personnel.
 - Require interviews when personnel resign. The interview covered concerns about corruption in the Company that the personnel were concerned about. or experienced during work.
7. Company personnel have a duty to report incidents of corruption or potential corruption to those in authority. The duties of the Company's personnel in detail are as follows:
- Study policies or manuals related to anti-fraud and corruption, risk management, corruption, corporate governance and business ethics political assistance giving donations for charity, financial support and giving gifts, welcome fee and other expenses.
 - Communicate policies or manuals related to anti-fraud and corruption. Risk management Corruption, corporate governance and business ethics political assistance Giving donations for Charity, financial support and giving gifts, hospitality service fees and other expenses to business stakeholders clearly.
 - Understand duties and responsibilities in combating fraud and corruption as well as administration own corruption risk and perform duties as specified.
 - Report an abnormality inappropriate behavior or events suspected of being fraudulent to the channel Report the clues specified by the Company.
 - Cooperate by providing information to the investigation committee or when requested to assist in investigation process.
 - Be careful of various risk factors and present risk-related issues to the relevant department directors in a timely manner.
8. Organize a corruption risk assessment at least once a year. By assigning experienced personnel Directors, executives and employees at all levels has duties and responsibilities to perform duties in accordance with this anti-corruption policy. In case of doubt or witnessing a violation of the said policy, must report to supervisors or through designated reporting channels as determined by the Company. In cases where issues are found that have a serious impact on the Company's reputation, must report urgently to management and the Board of Directors directly. (In case of urgent need)

9. In this announcement Reporting incidents or reporting according to the order of command or superiors adhere to the hierarchy of command according to the Company's organizational structure chart. In the case of directors, inform the chairman of the board and in the case of the chairman of the board, notify the Board of Directors accordingly.

In addition, the Company considers it the duty of personnel at all levels. From general personnel to the level of the Board of Directors to understand and comply with anti-corruption measures including a risk management manual as well as policies and other related work guidelines without exception. This violation or not following policies and manuals. Such action may lead to disciplinary action.

Commitment to anti-fraud and corruption

The Company places importance on correct processes and working methods. Efficient, transparent, verifiable, and free of corruption because the Company is aware and believes that various elements. The above is one factor that will create confidence for all stakeholders as well as creating sustainable growth for the Company including adding value to the Company and shareholders in the long term. Therefore, the Company will not accept any corruption including not ignoring any actions that may lead to fraud and corruption even though that action is beneficial to the Company. This is to ensure that the Company's personnel will comply with the Company's commitment to anti-fraud and corruption. Company personnel must understand and follow "Anti-Corruption Measures" which covers "Policy on Anti-Corruption" and "Policy on Reporting of Wrongdoing or Complaints and Provide protection to those who report clues or complaints" as well as related operating procedures manuals and other policies of the Company strictly without exception. In addition, any work of the Company's personnel must comply with the laws of Thailand, especially the anti-corruption law to avoid actions that may result in inappropriate actions and contradict the principles of good management.

The Company pledges to conduct a thorough and appropriate investigation into all suspected cases of corruption. Regardless of other external factors (such as job position, length of time working in the Company or relationships within the Company of the accused) whereby the Company will conduct an investigation impartially and without bias. In addition, the Company will punish offenders according to the highest measures. And if the investigation finds that there are personnel who are aware of the case corruption but neglected to report. The Company will consider disciplinary action against those personnel as well. However, the Company will not demote, punish, or give negative consequences to employees who deny corruption. Even though that action will cause the Company to lose business opportunities and will provide the best protection for the safety of those who report corruption according to the standards required by law.

Guidelines for anti-corruption practices

1. Company directors, executives and employees at all levels Including those involved must comply with the anti-corruption policy, Corporate Governance Policy, Business Ethics and Organizational Ethics and Company regulations strictly. They must not be involved in corruption, both directly and indirectly.
2. Company personnel must not do anything which shows corruption, giving or receiving bribes to stakeholders in their work, both directly and indirectly. In order to gain illegitimate benefits, the Company specifies the giving or receiving of gifts, souvenirs, gifts, or any other benefits must be in accordance with customs and traditions and act in a reasonable and appropriate manner. It must not have unreasonable value or lead to the performance or omission of one's duties. This may lead to corruption.

3. Charitable donations using the Company's money, items, or assets must be made in the name of the Company only. Donations must be made to a trusted organization. Have a valid certificate can be checked and must proceed through the steps according to the Company's regulations
4. Support using money, items, or assets of the Company to support various projects The name must be specified in the name of the Company only and must have a business purpose. Good image of the Company and must proceed through the steps according to the Company's regulations. The disbursement must specify a clear purpose and have evidence that can be verified.
5. Support and encourage personnel at all levels to see the importance and awareness of anti-corruption, including establishing internal controls to prevent corruption, giving or receiving bribes in all forms.
6. Spread knowledge and understand third parties who have business ties with the Company In matters that must be complied with in accordance with the anti-corruption policy.
7. Company personnel must not do anything that shows that they are not politically neutral It is prohibited to support or act in favor of any political party. Both directly and indirectly Including not using the Company's resources. For operations related to politics that shows not being politically neutral.
8. Company personnel must not be neglected or ignored. When found actions that are considered corruption related to the Company. You must notify your supervisor or responsible person and cooperate in investigating various facts.
9. The Company will be fair and protect personnel or any other person who reports clues or evidence of corruption related to the Company. By using measures to protect complainants or those who cooperate in reporting corruption, the Company will not punish, demote or give negative results to those who report corruption.
10. Those who commit corruption are a violation of the rules, regulations and ethics of the Company. Disciplinary action must be considered according to the Company regulations and if it is a violation of the law must also be punished by law.
11. The Company has prepared a corruption risk assessment including prioritization and determining appropriate measures, including monitoring and inspecting the results of such measures by reviewing risk management measures to ensure they are appropriate to prevent risks to an acceptable level.
12. The Company must organize an internal audit to ensure that the established risk management system helps the Company achieve its goals. Including inspecting operations within the Company to ensure compliance with requirements and regulations.
13. The Company must ensure that these operational measures are documented in accordance with internal control principles to ensure compliance with Company policies and regulations.

14. The Company designates executives as followers. Control employees at all levels and those involved, especially employees under supervision have knowledge and understanding and strictly follow the anti-corruption policy.
15. This anti-corruption policy covers the personnel management process. From recruiting or selecting personnel Giving rewards and promotion, training, and performance evaluation.
16. Company personnel must sign to acknowledge the anti-corruption policy to confirm that all employees are aware, understand and are ready to apply the principles in the anti-corruption policy. It is a code of conduct for operating with strictness throughout the organization.

Guidelines for preventing corruption

Guidelines for preventing corruption can help companies reduce the risks that may cause corruption in the organization. Assess corruption risks, design and operate appropriate internal controls to reduce risk, corruption as well as creating awareness and values in anti-corruption among the Company's personnel. It is an important factor to help prevent corruption in the organization. Guidelines for preventing corruption under the risk management manual This edition consists of 5 main activities as follows:

1. Fraud risk assessment

Fraud risk assessment: The objective is for every department in the Company to take proactive steps to identify, evaluate and review the organization's corruption risks. Including creating awareness of the risks of potential corruption and the impact on the objectives and operations of the organization. To ensure that the risk areas of corruption were identified and dealt with in a timely manner. However, executives of all departments must cooperate to provide information on corruption risks that may occur in their departments

Corruption risk assessment consists of 4 main steps as follows:

- Step 1: Preparation to set criteria for measuring risk in terms of impacts and the opportunity to occur including determining the level of risk that the organization accepts.
- Step 2: Identifying corruption risks, main causes of risk and the impact of risks. As well as analyzing the severity and likelihood of risks occurring before considering existing internal control measures.
- Step 3: Evaluation of the current internal control system. Analysis of the severity and likelihood of risks occurring after current internal control measures are in place.
- Step 4: Providing measures to reduce risks to a level acceptable to the organization. If control measures. The current internal threats are not sufficient to protect against corruption risks.

Therefore, the executives have assigned the Anti-Corruption and Corruption Working Group to provide advice to Executives for assessing corruption risks Including being the one who compiles the results of the risk assessment of corruption to document the organization's corruption risks which covers the corruption risk diagram and corruption risk register. As well as monitoring the implementation of the risk management plan to present to the Board of Directors, Audit Committee, Executive Committee, Management team and committees or other agencies related. However, the Anti-Corruption and Corruption Working Group is only responsible for providing advice and collecting risk information, identifying and assessing risks including the provision of measures to reduce or manage risks is the direct duty of the risk owner or executive in each unit of the organization. In addition, the Internal Audit Department is responsible for evaluating the adequacy and effectiveness of the internal control system identified during the risk assessment. If the internal controls identified by the risk owner are insufficient or ineffective, the internal audit department can provide opinions and recommendations to management in order to provide additional internal control measures to reduce risks to a level acceptable to the organization. The Company must assess and review corruption risks annually. This can be done in conjunction with the organizational risk assessment. To identify

increased risk or changes in existing risk levels from year to year. which can change from various factors such as changes in operating processes, use of new information technology systems Changing the duties and responsibilities of personnel in the Company or new methods of corruption, etc.

2. Policies related to anti-corruption

The Company provides measures, policies, manuals, and guidelines to combat fraud and corruption, such as measures Anti-corruption Policy on reporting clues wrongdoing or complaints and provide protection to those who report clues or complaints. Guidelines for giving and receiving gift, gift Guidelines for spending on business entertainment and other related expenses with the performance of business contracts guidelines for donating to charity guidelines for providing financial support guidelines for political assistance, etc., So that Company personnel understand ethical principles and good work practices of the Company. Including to create awareness, conscience and values in resisting corruption to the Company's personnel. This policy, operational manual and related measures must be approved by the Board of Directors and/or sub-committees or working group assigned by the Board of Directors. In addition, the Anti-Corruption Working Group must regularly review and update related policies and manuals. (At least once a year) To ensure that the policies and manuals appropriately cover operational and legal changes. The Company communicates the operating manual and related measures to the Company's personnel and subsidiaries including communicating policies and measures to outsiders. (Business stakeholders and the public). Company personnel at all levels are responsible for studying and understanding the content including following the policies and manuals Perform work and such measures strictly.

3. Communication and training

- Data Communication: through a meeting of the management team notified through the public relations board, website, annual report or other methods as appropriate related to anti-corruption measures for employees, executives, subsidiaries, shareholders, customers, partners, and all groups of stakeholders and those involved in the business are informed. According to the steps for communicating anti-corruption measures and various policies. Any other related They are as follows:
 1. Prepare an annual communication plan for anti-fraud and corruption policies and measures. Written the said communication plan must cover communication both inside and outside the organization.
 2. Set communication channels such as Company newsletters, billboards (Poster), brochures, organizing training or workshops, etc. To be appropriate for the recipient both inside and outside the organization
 3. Set the communication frequency of each channel.
 4. Set communication content to cover anti-corruption measures policy and manual. The Company's expectations regarding the implementation of anti-fraud and corruption measures. The Company will not demote or punish personnel if they

deny corruption and penalties if Company personnel do not comply with such measures.

5. Carry out communications according to the annual approved communication plan.

- Employee training: The Company will organize training to provide knowledge and a correct understanding of the overall picture of corruption. Including policies and guidelines for managing organizational corruption risks for executives and employees. To be able to apply it in their own work correctly, transparently, and verifiably by focusing on providing knowledge and understanding, how to proceed with complaints to create confidence for employees in reporting incidents and clues about corruption. Including other knowledge more related continuously strengthening and stimulating good conscience among executives and employees. To maintain oneself within the correct framework and direction with additional training Publicizing information through various public relations media Organizing special activities, etc.

- Disclosure: Through the annual report, the Company's website, or other methods as appropriate. To ensure that the Company and subsidiaries. There is a transparent operation can be verified to employees, executives, shareholders, customers, partners, all stakeholder groups and related parties as follows:

1. The Company will announce it to all employees. It will be distributed through the Company's intranet, including the preparation of brochures or announcement for general distribution and preparation of various media that represents the anti-corruption policy guidelines. So that all parties/departments are generally informed.
2. All directors, executives, and employees of the group of companies will receive training or be informed about the ongoing anti-corruption policy especially the form of corruption, risks from participating in corruption, including reporting methods in case of witnessing or suspect that corruption will occur. The knowledge training will be part of the orientation for new employees as well. To create knowledge and understanding of policy implementation and penalties in case of policy violations.
3. Publish policy Anti-corruption for shareholders Outsiders or those interested can know the following channels:
 - Annual information disclosure report, form 56-1 (One Report)
 - <http://www.sikarin.com>
4. Prepare documents to inform all customers and business partners to communicate policies regarding receiving/giving gifts, giveaways, and customer entertainment. Giving

certification to partners, receiving/giving compensation, etc., during various festivals or business opportunity.

However, Communication of anti-corruption measures and policies any other Related are the duties and responsibilities of the anti-corruption working group. The communication plan must include training on anti-fraud and corruption policies and measures. In orientation for new employees as well as organizing continuous training every year for the Company's personnel all. To provide the Company's personnel with understanding and skills in complying with anti-corruption measures. policy Various practices related Including a risk management manual this edition is available.

4. Reviewing the history of personnel and business stakeholders

Reviewing the history of personnel and business stakeholders is an important factor in preventing corruption efficiently. The Company assigns the human resources department to review the history of personnel before hiring or promotion and the purchasing department is responsible for reviewing the history of business stakeholders before starting contracts or transactions between them. Review can be done as appropriate under relevant laws and received consent from personnel or business-related persons as follows:

- Reviewing personnel history before employment to check the suitability and qualifications Job applicant experience
- Reviewing the history of personnel before assigning them to important positions within the Company, such as Board of Directors Senior executives, personnel in the financial department, etc., to check qualifications, experience, financial credibility, references, or conflicts of interest that It may arise from taking a new position.
- Reviewing the history of business stakeholders, especially vendors, contractors, and service providers to the Company. To be able to check reliability financial status, reputation and qualifications related to the product or Business Stakeholder Services.

In addition, the Company's Board of Directors, executives, and personnel holding important positions as determined by the department Human resources as well as business stakeholders Potential conflicts of interest must be reported to Managing Director or Chairman of the Board of Directors and Chairman of the Audit Committee (depending on the case) regularly every year and during the year If there are any changes that may cause conflicts of interest. The Company prohibits personnel with conflicts of interest from being involved in the procurement process and will punish personnel who do not report conflicts of interest in a timely manner.

5. Internal control

Internal control is an operational process that is jointly determined by the Company's Board of Directors, executives, and Personnel of the organization at all levels in order to have reasonable confidence that methods or operations as specified set to help the organization achieve its objectives. Therefore, internal control is considered a basic tool of the Company to prevent corruption in the operating process of every department. Executives in each department must design appropriate internal controls for the

processes under their responsibility. To manage and reduce corruption risks that are jointly identified in the corruption risk assessment to a level acceptable to the organization. As well as communicate, understand, and control and monitor the operations of personnel in the agency to operate according to the established internal control system.

Every department must develop written operating procedures or procedures for every process for the executives of the agency to review and approve it to be effective. Taking into account the clear separation of duties in determining the duties of personnel in carrying out work procedures or processes. To make operations transparent, be independent and can help prevent or detect corruption risks including storing such documents in a channel that relevant personnel can access and communicate to relevant personnel. The Supervision and Audit Department is required to prepare an audit plan at least once a year or when there are changes that significantly affect operations. To ensure that the work procedures or work processes are consistent with the principles of good internal control. The audit plan will be approved by the Audit Committee. The plan will be considered according to the risks that cause corruption. For the Company's operations to be appropriate and efficient, including compliance with laws and regulations of the relevant authorities and to reduce the risk of corruption. Therefore, there is an internal audit system to ensure reasonable confidence that control system Existing internal resources can help the Company achieve its goals. By specifying procedures for reporting inspection results. and reporting on various urgent issues as follows:

1. The Audit Department must report the results of the audit and any issues found at least once a year to the Audit Committee and inform relevant parties.
2. After reporting the inspection results the results of internal control must be discussed to proceed with finding appropriate internal control methods.
3. If it is found that there is an urgent issue The Audit Department will report directly to the Audit Committee Chairman immediately.
4. The Audit Committee will be responsible for reporting the audit results to the Board of Directors.

However, The Company's management has assigned the internal audit department to assess its adequacy suitability as well as the efficiency and effectiveness of the organization's internal controls. Ready to give suggestions and solutions to improve / develop internal control to be efficient and effective. Able to prevent and detect potential risks Especially the risk of corruption. The internal audit department must discuss the results of the audit with the executives of the auditing agency. To understand and provide guidelines for improving and developing appropriate internal controls and can actually be put into practice Including reporting the results of the audit to the Audit Committee on a quarterly basis. The executives of each department are responsible for using suggestions to improve and develop from the guidelines suggested by the internal audit department.

When the Company begins implementing anti-fraud and corruption measures. The internal audit department is responsible for Evaluate the design and the effectiveness of internal controls for such measures and report the results of the inspection to the Audit Committee.

Guidelines for detecting corruption

The Company needs to develop measures to detect corruption. To help detect and report actions that may be fraudulent in a timely manner. Therefore, mechanisms for reporting incidents or clues and reporting corruption are key activities that can help companies detect corruption. In addition, to ensure that fraud detection is appropriate, efficient and effective. The internal audit department must review the design and internal controls of the guidelines on an annual basis. Detecting corruption consists of 2 main activities as follows:

1. Reporting incidents or clues

The Company provides channels for complaints and whistleblowing to receive complaints, comments, and suggestions from stakeholders who have been or are at risk of being affected by the corruption-related actions of the Company's personnel, whether directly or indirectly. The Board of Directors has assigned the Audit Committee to consider receiving complaints or clues about corruption. Complainants can report complaints or clues along with their name, address, and telephone number where they can be contacted through the following channels:

- Directly through your supervisor/agency
- Through the network system within the organization (Intranet) or e-mail: ir.sikarin@gmail.com
- - Company Secretary
Sikarin Public Company Limited
976 Lasalle Road, Bangna Tai Subdistrict, Bangna District, Bangkok 10260
- E – mail: ir.sikarin@sikarin.com
- Telephone: 0 – 2366 – 9900 ext. 20905
- Fax : 0 – 2366 – 9907

Measures to protect those who report complaints or provide clues:

The Company will keep the information of those who make complaints or whistleblowers confidential. This information will be limited to those responsible for investigating complaints. In the case where the person reporting the complaint or clue is a Company personnel will receive appropriate and fair protection from the Company, such as no job demotion, suspension, termination, intimidation, or negative consequences for employees who refuse to commit corruption. Even though that action will cause the Company to lose business opportunities and will provide the best protection for the safety of those who report corruption according to the standards set by law. You can be sure that Channels for requesting such advice It's a safe channel complies with measures to protect and maintain confidentiality as specified in "Anti-Corruption Measures"

Managing Director has a role and duty in exercising discretion and assigning executives who must not be directly or indirectly involved in matters that have been reported to complaints or clues. Perform duties on behalf of using discretion to order protection of the safety of those who report complaints or clues, witnesses, and persons who provide information to protect the safety of such persons.

To disseminate anti-corruption policy Corruption is thoroughly known to the Company's personnel. The Company has published the said policy through the Company's communication channels, such as the Intranet (communication channel within the Company), the Company website, Annual information disclosure report 56-1 (One Report), including providing communication to new employees to make them aware of the said policy. The Company will review the anti-corruption policy annually to be consistent with business changes.

2. Reporting corruption

When reporting incidents or clues to corruption, the Human Resources Department collects information from whistleblowing and other information any other related to corruption such as number of whistleblowing reports of corruption, summary of events and status of operations in the case of corruption in the organization (status of investigation, Conclusion on punishment decisions, and statistical data on corruption in organizations, status of performance according to anti-fraud and corruption measures etc.) to report to the Executive Committee and the audit committee annually

If the notification is serious and needs to be resolved promptly, the Human Resources Department must initially report such corruption incidents when they occur to the Executive Board and the Audit Committee for further consideration.

However, the information in the report must be kept confidential. The Human Resources Department must report directly to the designated authority only. It is forbidden to share information in any form with unrelated agencies or individuals.

Guidelines for responding to corruption that occur

To correct and improve the impacts caused by corruption including finding ways to prevent similar corruption from occurring again. The guidelines for responding to corruption include (a) internal investigation (b) punishment and improvement. (c) and disclosure of information

1. Internal Investigation

In the event of fraud, the Company assigns the Legal Department to screen and investigate the preliminary facts, which the Company classifies the types of information into two types: in the case of the clue that is reported not to be severe against the Company and in the case of the clue that is reported to be severe against the Company to propose the list of the investigation committee to the Managing Director for consideration and further investigation of the facts.

The investigation committee is responsible for conducting the investigation according to “Investigation procedures and penalties” in Policy on reporting wrongdoing or complaints and providing protection to those who report wrongdoing or complaints. However, if the Company has insufficient resources or deems it appropriate to hire experts to conduct the investigation on behalf of the agency's personnel. The Company may consider hiring qualified third parties appropriately by proceeding with the procurement according to the procurement department's procedures. The Company has established a committee to investigate the facts for each case as follows:

The Committee for investigating clues in cases where the clues received are severe against the Company consists of:

- 1) Human resources representative
- 2) Agency representative
- 3) Representatives of unrelated parties and/or internal audit department and
- 4) Legal and regulatory representative

The Committee for investigating clues in the case of clues received that are not serious against the Company consists of:

- 1) Human resources representative
- 2) Agency representative
- 3) Representatives of unrelated parties and/or internal audit department and

In the process of investigation, the Investigation Committee must operate with fairness and not disclose information to those who are not involved. In addition, the Company must record the investigation in writing and keep both physical and electronic evidence for at least one year or until the end of the legal period to ensure that the Company has sufficient evidence to be used in court. In addition, the Company must provide training to personnel who can serve as members of the Investigation Committee on a regular basis to ensure that such personnel understand the detailed investigation procedures and have the knowledge and ability to conduct investigations appropriately and fairly. The Company considers it the duty and responsibility of all personnel to cooperate with the Investigation Committee in conducting investigations, as well as to support the operation of the Investigation Committee in the field of information and operations.

2. Punishment and correction

The Company has strict and decisive punishments, showing the Company's stance on corruption to both employees and stakeholders' interest. Meanwhile, improving and resolving the effects of corruption is something that the Company must pay attention to and take action in a timely manner to demonstrate care and commitment to solving corruption problems.

Punishment: The Company considers it the duty of all personnel at all levels, from general personnel to the Board of Directors, to understand and comply with anti-corruption measures, including this Corruption Risk Management Manual, as well as other relevant policies and guidelines without exception. Violation or non-compliance with the policy and manual may result in disciplinary action.

The Company will take disciplinary action against Directors, Executives and Employees who violate the anti-corruption policy, with disciplinary penalties up to dismissal and/or termination from employment. Failure to be aware of this policy and/or applicable laws cannot be used as an excuse for non-compliance with this policy. When the investigation was completed, it was found that corruption had actually occurred. The Investigation Committee is responsible for presenting facts and evidence to the authorities to consider penalties in accordance with the Company's policies and other relevant laws. The Company has designated the Investigation Committee to present the penalty to the Managing Director and Chief Operating Officer for consideration and approval. This is in accordance with the Company's regulations, including human resource management regulations and practices, labor laws, and other relevant laws.

For the penalty procedure, the Company must record the penalty determination method and penalty conclusion in writing, and all documents related to the penalty must be kept together with the important documents in the investigation process for at least 1 year from the date the penalty is approved. In addition, if the penalty poses a legal risk to the Company. The representative of the Fact Investigation Committee must consult with the Legal and Supervisory Department and the management to clarify before proceeding.

Correction: After the investigation process was completed. Executives must jointly consider corrective measures from corruption incidents as proposed by the Investigation Committee, such as updates or additions to the Company's policies, improvements or additions to internal controls, changes in operating methods, criminal and/or civil prosecutions. Expanding the results of the investigation to investigate corruption in other areas that may be relevant, etc. The task is to assign the agencies involved in the corrective measures in each case to prepare an improvement plan along with the time frame for the implementation to be presented to the President and the Chief Operating Officer and implement the approved revision plan.

3. Disclosure of Information: The Company requires the Chairman of the Board of Directors or personnel designated by the Chairman of the Board of Directors to disclose important information related to corruption to external agencies in charge of supervision (such as the Securities and Exchange Commission of Thailand, etc.) or to the public. However, the Company requires that the decision to disclose information related to

corruption in each subject is subject to the discretion of the Chairman of the Board of Directors. However, The Company prohibits any person who is not responsible or not authorized by the Chairman of the Board of Directors to disclose fraudulent information to other persons in the Company, third parties, the media, or any other entity. If a violation is found, the Company will consider punishing the violator without exception.

Reference documents and authority to take responsibility for operations

Principles or operating procedures in this corruption risk management manual may refer to documents already prepared by the Company. In such cases, operating procedures and responsibilities shall be in accordance with that reference document. To ensure that work is of the same standard. If Company personnel have questions about operations According to this corruption risk management manual, you can ask for advice from the human resources department.

Reviewing and improving the corruption risk management manual

This corruption risk management manual is under the supervision of the Company's Board of Directors. There will be a review and update this guide regularly (At least once a year) or when there are important changes affecting the administration. Corruption risk in order to ensure that the corruption risk management manual is consistent with the Company's principles, including Comply with regulations and other related laws. In addition, improvements to the corruption risk management manual must be approved by the Board of Directors, Sub-committees or the assigned agency and the updated manual has been communicated to the entire Company.

Fraud and Corruption Risk Assessment Policy is effective from 21 January 2024 onwards by the resolution of the Audit Committee at its meeting No. 1/2024 on 20 January 2024.



Mr. Seni Chittakasem
Chairman