

“Assessment of Corruption and Fraud Risks – Top 5 High-Risk Areas for 2024”

| Business Activities | Risk Type | Corruption Risk Description | Key Controls already in place | Risk Owner |
|--|------------|---|--|------------------|
| 1. Risk of incorrect or incomplete payment of land and building Payment of land and building tax under the Land and Building Tax Act B.E. 2562 (Local Administrative Organization / Department of Lands) | Misconduct | The company owns large amounts of land and buildings in Bangkok and other provinces as part of its investment in industrial estates and real estate development. Tax payments may be made incorrectly or incompletely, which could damage the company’s reputation and credibility. Employees may offer bribes to local administrative officials and/or the Department of Lands to avoid legal actions. | <u>Operational Control</u> 1. Work Instruction (WI) for Land and Building Tax Payment (WI-HQ-029) 2. Work Instruction for Government Liaison (WI-HQ-020) 3. Procedure for Legal and Regulatory Compliance Assessment (EP-CO-002) 4. Anti-Corruption Policy & Guidelines <u>Environmental control</u> 1. ISO 9001:2015 Quality Management System 2. Risk Management Policy and Handbook 3. Training Records (2024) <u>Financial control</u> 1. Company Regulations of Saha Pathana Inter-Holding Public Co., Ltd. <u>Monitoring control</u> 1. Annual Audit Plan 2025 2. Audit Program 3. Internal Audit Reports - Audit Working Paper - Audit Report 4. Audit Committee Meeting Reports 5. Internal Audit Results reported to CEO 6. Reports from Audit Committee to the Board of Directors | Legal Department |

| Business Activities | Risk Type | Corruption Risk Description | Key Controls already in place | Risk Owner |
|--|------------|--|---|--|
| 2. Risk of failure to renew groundwater usage license Groundwater usage license renewal (Department of Groundwater Resources, Ministry of Natural Resources and Environment) | Misconduct | The company operates industrial estates and provides utilities, including groundwater extraction for tap water production. Groundwater may be extracted in excess of the licensed quota, leading to risk of non-renewal of permits. Employees may bribe officials to avoid legal consequences. | <p><u>Operational control</u></p> <ol style="list-style-type: none"> 1. Work Instruction for Groundwater Usage (WI-HQ-030) 2. Work Instruction for Government Liaison (WI-HQ-020) 3. Procedure for Legal and Regulatory Compliance Assessment (EP-CO-002) 4. Anti-Corruption Policy & Guidelines <p><u>Environmental control</u></p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Quality Management System 2. ISO 14001:2015 Environmental Management System 3. Environmental Policy 4. Risk Management Policy and Handbook 5. Training Records (2024) <p><u>Financial control</u></p> <ol style="list-style-type: none"> 1. Company Regulations of Saha Pathana Inter-Holding Public Co., Ltd. <p><u>Monitoring control</u></p> <ol style="list-style-type: none"> 1. Audit Plan 2024–2025 2. Audit Program 3. Audit Working Paper & Audit Report 4. Audit Committee Meeting Reports 5. Internal Audit Results reported to CEO 6. Reports from Audit Committee to the Board of Directors | Legal Department / Water & Environmental Engineering Department |

| Business Activities | Risk Type | Corruption Risk Description | Key Controls already in place | Risk Owner |
|---|------------|---|---|---|
| 3. Risk of improper sludge disposal from wastewater treatment plants Sludge removal and disposal under the Factory Act B.E. 2535 (Department of Industrial Works) | Misconduct | The company generates sludge from wastewater treatment in its industrial estates. Authorized contractors are hired for disposal, but they may not comply with regulations. This may result in partial or complete suspension of operations, damaging the company's reputation. Employees or contractors may bribe municipal officials to avoid legal penalties. | <u>Operational control</u> 1. Work Instruction for Sludge Disposal from Central Wastewater Treatment (WI-HQ-027) 2. Work Instruction for Government Liaison (WI-HQ-020) 3. Quality Procedure for Contractor Selection and Hiring (QP-CO-004) 4. Quality Procedure for Internal Control Monitoring (QP-CO-008) 5. Procedure for Operational Control (EP-CO-004) 6. Procedure for Monitoring and Measurement (EP-CO-006) 7. Procedure for Legal and Regulatory Compliance Assessment (EP-CO-002) 8. Annual ISO 14001 Program (FM-CO-026) including compliance reviews & regulatory updates 9. Risk Management Policy and Handbook 10. Environmental Service Contracts (Saha Group Industrial Park, Sriracha) <u>Environmental control</u> 1. ISO 14001:2015 Environmental Management System 2. Environmental Policy 3. Training Records (2024) <u>Financial control</u> 1. Company Regulations of Saha Pathana Inter-Holding Public Co., Ltd. <u>Monitoring control</u> 1. Audit Plan 2024–2025 2. Audit Program | Water & Environmental Engineering Department |

| Business Activities | Risk Type | Corruption Risk Description | Key Controls already in place | Risk Owner |
|--|------------|--|--|--|
| | | | 3. Internal Audit Reports - Audit Working Paper - Audit Report 4. Audit Committee Meeting Reports 5. Internal Audit Results reported to CEO 6. Reports from Audit Committee to the Board of Directors | |
| 4. Risk of wastewater discharge into public water bodies not meeting legal standards Wastewater discharge permit (Marine Department) | Misconduct | The company employs specialists for wastewater treatment before discharge. However, discharged water may exceed legal standards, leading to suspension or revocation of discharge permits. Employees or contractors may bribe officials to avoid inspections or prosecution. | <u>Operational control</u> 1. Work Instruction for Water Quality Control prior to Discharge (WI-HQ-001) 2. Work Instruction for Government Liaison (WI-HQ-020) 3. Quality Procedure for Contractor Selection and Hiring (QP-CO-004) 4. Environmental Procedure for Operational Control (EP-CO-004) 5. Environmental Procedure for Emergency Preparedness and Response (EP-CO-005) 6. Quality Procedure for Internal Control Monitoring (QP-CO-008) 8. Progress Reports (FM-CO-012) 9. Anti-Corruption Policy & Guidelines 10. Risk Management Policy and Handbook 11. Environmental Service Contracts (Saha Group Industrial Park, Sriracha) <u>Environmental control</u> 1. ISO 9001:2015 Quality Management System 2. ISO 14001:2015 Environmental Management System 3. Environmental Policy | Water & Environmental Engineering Department |

| Business Activities | Risk Type | Corruption Risk Description | Key Controls already in place | Risk Owner |
|---|------------|---|---|---|
| | | | 4. Training Records (2024) <u>Financial control</u> 1. Company Regulations of Saha Pathana Inter-Holding Public Co., Ltd. <u>Monitoring control</u> 1. Audit Plans (2023, 2025) 2. Audit Program 3. Internal Audit Reports (Audit Working Papers & Reports) - Audit Working Paper - Audit Report 4. Audit Committee Meeting Reports 5. Internal Audit Results reported to CEO 6. Reports from Audit Committee to the Board of Directors | |
| 5. Risk of constructing or modifying buildings without proper permits or deviating from approved plans Building construction or modification (Municipality / Local Administrative Organization) | Misconduct | The company constructs or modifies buildings within industrial estates. Construction may deviate from approved designs, leading to suspension orders, demolition, or legal prosecution. Employees may bribe local officials to avoid penalties. | <u>Operational control</u> 1. Work Instruction for Construction/Modification Processes (WI-HQ-004) 2. Work Instruction for Government Liaison (WI-HQ-020) 3. Quality Procedure for Contractor Selection and Hiring (QP-CO-004) 4. Quality Procedure for Internal Control Monitoring (QP-CO-008) 5. Procedure for Operational Control (EP-CO-004) 6. Procedure for Monitoring and Measurement (EP-CO-006) 7. Procedure for Legal and Regulatory Compliance Assessment (EP-CO-002) | Civil/Architectural Department / Legal Department |

| Business Activities | Risk Type | Corruption Risk Description | Key Controls already in place | Risk Owner |
|---------------------|-----------|-----------------------------|---|------------|
| | | | <p>8. Annual ISO 14001 Program (FM-CO-026) including compliance reviews & regulatory updates</p> <p>9. Risk Management Policy and Handbook</p> <p>10. Anti-Corruption Policy & Guidelines</p> <p><u>Environmental control</u></p> <p>1. ISO 14001:2015 Environmental Management System</p> <p>2. Environmental Policy</p> <p>3. Anti-Corruption Policy Manual and Guidelines</p> <p>4. Training Records (2024)</p> <p><u>Financial control</u></p> <p>1. Company Regulations of Saha Pathana Inter-Holding Public Co., Ltd.</p> <p><u>Monitoring control</u></p> <p>1. Annual Audit Plan 2025</p> <p>2. Audit Program</p> <p>3. Internal Audit Reports</p> <ul style="list-style-type: none"> - Audit Working Paper - Audit Report <p>4. Audit Committee Meeting Reports</p> <p>5. Internal Audit Results reported to CEO</p> <p>6. Reports from Audit Committee to the Board of Directors</p> | |