



(Translation)

Anti-Corruption Policy

Saha Pathana Inter-Holding Company Limited

(Revised no. 1)

The Board of Directors of Saha Pathana Inter-Holding Company Limited has approved the resolution to sign a Declaration of Intent of Collective Action Coalition against Corruption enacted by Thai Private Sector on 14 January 2014. Therefore, in accordance with the principles set out by the Company's Good Corporate Governance Principles to build confidence for all stakeholders. To support sustainable growth for the company and in accordance with the intent and overall social responsibility.

The Company's has the policy relevant to laws countering corruption by prohibiting the Company Directors, Executives and Employees from accepting or supporting every type of corruption both in a direct and indirect manner, the policy is detailed as follows;

1. The Company's shall not engage in and/or encourage any act in accepting bribes and payment of facilitation in any form.

2. In the event that the Company's offering charitable donation or accepting donation, being a supporter or a recipient, giving political support, hiring government employees or government officials (revolving door), including giving or receiving gifts, entertainment and hospitality, the Company's will proceed according to the prescribed regulations and operating guidelines.

3. Supporting enhancement of awareness and value for anti-corruption among the Company Directors, Executives and Employees to perform their duties in accordance with relevant laws, notifications and regulations by preparing a manual for guidelines.

4. The Company Directors, Executives and Employees must not act as an intermediary in demanding and accepting gifts or benefits from government sectors or private sector, which induces it to violate any laws. Moreover, it is illegal to use positions and/or duties to use the Company's data to seek benefits for themselves or others.

5. Setting the system to report financial status transparently and accurately, providing an efficient and effective internal control system and controlling a check-and-balance system to be appropriate in order to prevent conducting any fraud or taking part in any fraud and corruption.

6. Monitoring and reviewing the anti-corruption policy, guidelines and regulations consistently for the operation in order to adjust to business changes, laws and regulations.

7. Providing a channel for reporting any suspicious activities and ensuring that such reporters receive protection.

The Anti-Corruption Policy was approved by the Board of Directors Meeting No.9 (Board #28) on December 16, 2021 and effective from December 17, 2021 onwards by cancelling the policy of Anti-Corruption Policy which came into effect on March 13, 2015 and approved by the Board of Directors Meeting No. 11 (Board #21) on March 12, 2015.

Mr. Somkid Jatusripitak

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Chairman of the Board of Directors