

# SAHATHAI

## Terminal

### Anti-Corruption Policy

Saha Thai Terminal Co., Ltd. has determined to undertake its business with integrity, transparency, responsibility and good governance. Besides the company has put its focus on building and promoting good governance culture in the organization to ensure compliance from every director and employee and the ultimate benefits. Therefore the company has arranged the anti-corruption policy to counter all kind of corruption since it is aware that corruption will harmfully ruin free and fair competition and will further damage the economic and social development.

#### 1. Objective

- 1.1 To demonstrate intent and determination of the company to counter all kind of corruption whether directly or indirectly
- 1.2 To provide criteria on anti-corruption and prevention to every director, executive and employee for acknowledgment and strict compliance
- 1.3 To enhance confidence of customers or investors, shareholders and stakeholders such as government agencies, employees of the company and auditors.

#### 2. Definition

Corruption means all kind of bribery, whether directly or indirectly and/or use of inside information learned from the work performed for the company to do anything for its advantage or colleagues or the other related persons to acquire money, property, business or any other benefit, whether directly or indirectly, which is inappropriate under the business ethics and bribery in terms of offer, offer agreement, promise, claim or acceptance of money or benefits related to money or other benefit, whether directly or indirectly to procure business or to keep or recommend the business to any particular company or to keep any other benefits inappropriate under the business ethics unless it is the law, regulation, notification, requirement, customs, local tradition or trade practice which could be undertaken.

#### 3. Scope

- 3.1 This policy is applicable to every employee including every director, executive and employee, for compliance and every employee is required to comply with the other policies related to ethics and business practice of the company.
- 3.2 The company has anticipated that the customers, trading partners, representatives or business agents which have business contact with the company will comply with this policy or assist the company in the anti-corruption work.

#### 4. Duties and responsibilities

- 4.1 The board of directors has to put its focus on all kind of anti-corruption measures and has to demonstrate its determination to pursue the practice on good governance concept, ethics and business practice, including major role to initiate the anti-corruption policy and responsibility for consideration and approval on the policy, including arrangement of efficient anti-corruption system to ensure that every employee of the company is aware and has its focus of problems related to corruption.

4.2 The audit committee has duties and responsibilities as follows.

1. To review the financial and accounting reports, internal control system and risk management related to the risk possibly incurred from fraud to ensure that the operation of the company is proper, suitable and efficient in accordance with generally accepted accounting standards.
2. To supervise the anti-corruption policy and measures to ensure that the company has undertaken its duties in accordance with laws and ethics provided.

4.3 The chief executive chairman and the executives have duties and responsibilities to determine the system to encourage and support the anti-corruption policy to communicate to the employees and all related parties and to review the suitability of the systems and measures in accordance with the business changes, regulations, requirements and legal provisions.

4.4 The internal audit has duties to examine and review the work on anti-corruption measures whether it is correct and suitable to the policy, regulations and guidelines provided by the company and notifications, regulations, rules provided and to report to the audit committee and the board of directors.

4.5 Every employee is required to comply with the policy and guidelines on anti-corruption strictly and is required to sign for acknowledgement and compliance with this policy and submit to the human resource division for retention as evidence and confirmation that every employee has learned and understood and is ready to implement this policy. If there is any doubt or any offence is found, it is required to report to the superior or through the complaint channel :[www.sahathaiterminal.com](http://www.sahathaiterminal.com) of the company and the company will keep the information accepted through such system confidential and carefully submit such information to the related agencies.

5. Policy and guideline on anti-corruption policy

5.1 General

1 The directors, executives and employees of the company and its subsidiaries are not allowed to undertake, accept or support all kind of corruption whether directly or indirectly, including every company in the group, the contractors or related subcontractors and to arrange a review on compliance with this anti-corruption policy consistently and the review the guidelines to ensure correlation with the policy, regulations, requirements, rules, notifications, laws and business changes.

3. The anti-corruption standard is part of the business conduct and is the duty and responsibility of the board of directors , the executives, the superior, every level of employees, the suppliers or the subcontractors to participate and provide comments related to the practice to ensure that the anti-corruption work undertaken has accomplished the targets provided in the policy.

4. The company has developed the anti-corruption measure in conformation with related laws, including moral practice with arrangement of risk assessment on activity related to or prone to fraud and corruption and has arranged the practice manual for related parties.

5. The company has not undertaken or supported all kind of bribery or activity under its supervision, including controls of charitable donation, contribution to the political parties, business gift and support to various activities with transparency and without any intent to convince the officers in the public or private sector to undertake any inappropriate act.

6. The company has consistently arranged proper internal controls to prevent inappropriate action of the employees.
7. The company has educated the board of directors, the executives and employees on anti-corruption and fraud to encourage integrity, honesty and responsibility to undertake the duties with responsibility and to communicate its determination.
8. The company has arranged mechanism to present transparent and accurate statements of financial position.
9. The company has encouraged various channels of communication for employees and related parties to provide any doubtful clue and the informants will be protected without any penalty, unfair rotation or discrimination, including appointment of officers to monitor the clue informed.

To ensure transparency on the work undertaken on risky matter prone to corruption, the employees in every level are required to carefully perform the work as provided in Clause 5.2 through Clause 5.6 as follows.

#### 5.2 Political assistance

The political assistance means the financial assistance or any kind of assistance provided to the political party, politician or the candidate in the political election to provide the political support such as contribution of items or services, advertisement on promotion of political party or support/permission on job absence without wage payment or becoming an agent to participate in the political campaign, excluding participation in the activity in accordance with the personal liberty and freedom but the employment of the company or property, equipment or tool of the company is not allowed to be employed in any political activity.

The company has no policy to provide any support to the political activity of any political party as the policy of the company is non-alignment and has not leaned towards any political party or group so there will be no support or assistance to any particular political candidate, whether directly or indirectly.

#### 5.3 Bribery or payment to the government officers

The company has a policy for its employees not to propose or accept any bribe, money or payment from the government agency, government officer or any other organization, whether directly or indirectly, to acquire or maintain its business or competitive advantage unless it is the payment provided in the regulations.

#### 5.4 Charitable donation and financial support

The policy of the company on charitable donation or financial support is to provide charitable donation and financial support in an appropriate and transparent manner correctly in accordance with the laws and ethics, under the framework of related cultures, traditions and laws only and will not undertake any act which is possibly damaging the overall society.

The directors, executives and employees are required to be careful on charitable donation because there is a risk to be claimed as corruption or fraud or bribery. Therefore, the company has arranged the criteria related to charitable donation and financial support as follows.

##### Charitable donation

1. The charitable donation shall be proved with actual activity in accordance with such project and shall be actually the work undertaken to support and accomplish the objectives of the project and beneficial to the society or in accordance with the objectives of the Corporate Social Responsibility (CSR).

2. The charitable donation shall be proved that it is not involved with any counter benefit for any person or agency except the notification on honor in accordance with general business tradition such as affixation of logo, notification on the list at the activity premise or event or in the other public relations media.

#### Financial support

1. The financial support shall be proved with actual activity in accordance with such project and shall be actually the work undertaken to support and accomplish the objectives of the project and beneficial to the society or in accordance with the objectives of the Corporate Social Responsibility (CSR).
2. The financial support shall be proved that the financial support or any other benefit possibly computed in monetary term such as arrangement of residence and food is not involved with the counter benefits provided to any person or agency except the notification on honor in accordance with general business traditions.
3. To provide the financial assistance, a written request shall be prepared to indicate the name of the recipient of the financial assistance and objectives of the financial assistance, together with all supporting documents for approval by the authorized officer of the company.

#### 5.5 Acceptance of gifts, souvenirs or any other benefits

Gifts, souvenirs or any other benefits mean any non-monetary item of value provided to each other on any occasion to express goodwill gesture or relationship or reward or to express affection or friendship, including privileges not generally provided to the public through reduction of the selling price or privilege to receive the service, training or entertainment and travelling or tour expenses, lodging expense, food expenses or other items of similar nature whether it is a card, bill or any evidence, prepaid payment or refund to express friendship or to be normally provided in accordance with the culture, tradition or practice or social manner such as new year gift, birthday gift, gift provide for the new post or retirement.

The directors, executives and employees of the company are not allowed to ask/promise to accept gifts, souvenirs or any other benefits from the securities brokers, trading partners, contracting parties, business agent or representative illegitimately to convince ones to perform or omit any performance but it may accept gifts, souvenirs or any other benefits during the traditional occasion and not in conflict with the laws if the value of such item (approximate) is over 2,000 baht (two thousand baht), the recipient is required to fill in the "Form of acceptance of gift, souvenir or any other benefits" and submit such form to the Office of the secretary of the company together with the items accepted for further examination.

If the authorized officer or the superior has considered that such gift, souvenir or any other benefits should not be accepted, the recipient is required to return to the provider immediately. If the return is not possible, such items are required to be provided to the Office of the secretary of the company and they are held the property of the company, including gift, souvenir provided to the agent of the company for memory of the special occasion of the company such as the joint venture agreement signing ceremony, acceptance of honorable reward, souvenir accepted from the social

activity, etc., which is allowed to be accepted by personnel of every level of the company by filling in the form about the acquisition and retention of such souvenirs as detailed in the "Form of acceptance of gift, souvenir or any other benefits".

Criteria related to acceptance of gift, souvenir or any other benefits are as follows.

1. Non-monetary items
2. Item of value not over 2,000 baht (two thousand baht) from the same source
3. Item prepared for sale promotion affixed with the logo of the company (such as pen, hat, t-shirt, book)
4. Item prepared for public distribution (such as employees, shareholders or customers of the company)
5. Item prepared or bought for distribution/giving to trading partners during the traditional occasion (such as calendar, book, gift basket)
6. Privilege to be provided (for sale promotion from the trading partner)

#### 5.5 Business relationship

Fraud or corruption or bribery in all kind of businesses is not allowed whether it is directly incurred or through the third party such as securities broker, trading partner, contracting party, business agent or representative. The employee is not allowed to employ the third party with an objective to undertake any fraud, corruption or bribery while the company will inform the third party with business relationship that the policy of the company is to prevent all kind of fraud and corruption and to encourage the securities broker, trading partner, contracting party, business agent or representative with business relationship to join effort to prevent fraud and corruption.

#### 6. Risk assessment

Every director and executive of the company is aware and understand that the business process of the company is exposed to fraud and corruption and bribery. To prevent such risk, the directors and executives have determined to make the risk assessment on fraud and corruption and bribery possibly incurred in the company consistently at least once a year and to review such risk management measure to ensure that it is suitable to keep such risk to the acceptable level. In addition, the executives of the company are required to communicate with the employees of every level to understand and provide cooperation to efficiently manage such risk.

#### 7. Human resources

The anti-fraud and corruption policy is held part of the human resource management of the company including recruitment or selection process, orientation, training, performance assessment, reward and promotion. Every employee will be informed and sign to acknowledge this policy to ensure that the employee has understood the essence of compliance with this policy. Besides, the company has determined to hold that compliance with the anti-fraud and corruption policy is the regulations and it has communicate with the employees that the company will not accuse any employee or to demote or put any negative impact on any employee who refuses fraud and corruption even though such act may cause the company to lose its business opportunity from denial of bribery payment.

The employee who has not complied with the anti-fraud and corruption policy and measure or who has committed any fraudulent or corrupting act will be penalized or face the disciplinary action in accordance with the regulations of the company or may be dismissed and prosecuted under the laws if such act is illegal.

8. Training and communication

**Employee**

Every employee of the company is communicated to learn of the anti-fraud and corruption policy while the training course will be arranged for the executives and employees of the company to be aware of the essence of this particular policy, the policy on anti-fraud and corruption, including amendment and modification to be illustrated in the website of the company.

**Business agent and representative, supplier/service provider and related persons**

The business agent and representative, supplier/service provider and related persons will be communicated with the policy on anti-fraud and corruption since the outset of the business relationship and thereafter as deemed suitable and the company encourages the business agent and representative, supplier/service provider and related persons to hold on the social responsibility standard similar to that of the company.

9. Supervision, follow-up and review

The human resource division of the company will review and submit this policy to the board of directors of the company for approval. If there is any change, supervision and follow-up on the implementation of this policy, suggestions will be continuously provided and if there any improvement needed, it will be undertaken as soon as possible.

10. Penalization process

The penalty will be made in accordance with the regulation on disciplines of the employees of the company and/or related laws.

11. Effective date

This policy is in effect on 31 August 2016 and thereafter.

Approved by the Board of directors No. 4/2559  
On 30 August 2016

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### Form of acceptance of gift, souvenir or any other benefits

Acceptance     Provision of gift, souvenir or any other benefits, please indicate.....

No.	Date	Received from/Provided to (indicate name of the company and business relationship)	Objective	Details of gift, souvenir or any other benefits	Total value (baht)
Total (in letters) (baht)					

For recipient/provider of gift, souvenir or any other benefits

Name of the employee..... Office  Samut Prakarn     Laem Chabang

Division/Section ..... Date .....

Signed ..... (..... ) Preparer..... Position ..... ..... /..... /.....	Signed ..... (..... ) Preparer..... Position ..... ..... /..... /.....	Signed ..... (..... ) Preparer..... Position ..... ..... /..... /.....
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For examiner

Examined by ..... Division/Section ..... Date .....