

# **Sahamitr Pressure Container Public Company Limited**



## **Anti-Corruption Policy**

**2<sup>nd</sup> Revised Edition**

**(Approved by the Board of Directors' meeting on August 8, 2024)**

## **Anti-Corruption Policy**

The company does not tolerate any form of corruption, concerning all businesses and transactions in every country and all related entities. The company has established procedures to combat corruption in accordance with this policy and will regularly review these procedures to align with changes in business laws and maintain the company's reputation. All directors, executives, and employees must comply with this policy comprehensively.

### **Definitions under the Anti-Corruption Policy**

**Corruption** refers to any act of seeking undue benefits contrary to duty or law to benefit oneself, associates, and/or others by offering, promising, requesting, demanding, giving, or receiving bribes, inducing illegal actions directly or indirectly, falsifying evidence, using company assets for personal use, or engaging in actions that create conflicts of interest.

**Political Contributions** refer to financial or other forms of support to political activities. Financial support includes loans, donations, and other forms of assistance such as providing goods or services, advertising to support political parties, purchasing tickets for fundraising events, or donating to political parties. It also includes allowing employees to take leave or represent the company in political campaigns.

**Government Officials** refer to individuals holding political positions, civil servants, or local government employees with regular positions or salaries, those working in state agencies or state enterprises, local administrators, deputy local administrators, assistant local administrators, and members of local councils of local administrative organizations. It also includes officials under the law governing local administration or other officials as prescribed by law, including directors, sub-committees, employees of government agencies, state agencies, or state enterprises, and individuals or groups of individuals authorized by law to exercise administrative power established within the bureaucracy, state enterprises, or other state activities.

**Facilitation Payments** refer to small, unofficial payments made to government officials to ensure that they perform their duties or expedite processes that do not require the discretion of the government official and are within their official duties. This includes rights that legal entities are entitled to by law, such as obtaining permits, certificates, and public services.

**Bribery** refers to any act of offering, promising, giving, accepting, or soliciting any form of benefit, including gifts, services, cash, or other items, either directly or through others, to influence any action. This includes actions towards government officials or officials of international organizations that are contrary to law or their responsibilities.

**Employment of Government Officials** refers to hiring individuals who are or have been government officials, politicians, or advisors to government agencies to work for private companies. This may involve using relationships or insider information to benefit the company or create conflicts of interest between the duties of government agencies or business regulatory organizations and the company under their supervision. The intent of such actions is to gain unfair business advantages or to set policies that benefit the private sector where the former government official works.

**Conflict of Interest** refers to any situation, action, or activity where an individual's personal interests conflict with the interests of the company, whether directly or indirectly. Personal interests include the interests of related persons, whether by blood or other connections, that affect decision-making or the performance of duties in the position held by the individual. It also includes benefits obtained by exploiting one's position, affecting the company's collective interests. Such situations may lead to a lack of impartiality in transparent decision-making.

**Giving and Receiving Sponsorships** refers to funds given or received from customers, partners, or business associates, or other organizations for business purposes, branding, or the company's reputation, aimed at enhancing commercial credibility and appropriately managing business relationships.

**Donations** refers to providing financial or other forms of assistance, such as knowledge sharing or volunteering, as part of corporate social responsibility activities, donating company products, and publicizing for charitable or public benefits, enhancing the company's image without expecting business returns, and avoiding conflicts between personal and company interests.

**Receiving Donations** refers to accepting cash, goods, or assets intended for donation to charitable organizations.

**Giving Gifts, Hospitality, Entertainment, Travel Expenses, and Other Expenses** refers to offering gifts, hospitality, entertainment, travel expenses, and other costs that do not impact the company's performance but are compliance with relevant laws. These are given in the company's name, not in the employee's name, and are appropriate for occasions such as New Year, Songkran, Chinese New Year, etc., considered customary and conducted openly. They are also given out of necessity, to maintain good business relationships, or for other appropriate reasons.

### **Guidelines for Implementing the Anti-Corruption Policy**

1. Directors, executives, and employees of the company shall not accept or support any form of corruption, whether directly or indirectly.
2. The company has established guidelines for activities with a high risk of corruption for directors, executives, and employees as follows:
  - 2.1 Political contributions: All political contributions must be transparent, legal, not intended to induce inappropriate actions, not used for corruption. These contributions must also receive prior approval from the company's board of directors.
  - 2.2 Charitable donations: Charitable donations should aim to support the development of society, the economy, culture, and education. They must be transparent, legal, not used for corruption, and in compliance with the company's charitable donation regulations.
  - 2.3 Sponsorships: Sponsorships should aim to enhance the company's reputation and strengthen business relationships. They must be transparent, legal, not used for corruption, and comply with the company's sponsorship regulations.

- 2.4 Directors, executives, and employees do not request, demand, or give items or other benefits to those related to the company, except for giving or receiving according to local customs or trade practices, not exceeding the value set by the company, and complying with the company's gift and business hospitality regulations.
- 2.5 The company does not pay or receive facilitation payments or bribes in its business operations, whether directly or through representatives, consultants, brokers, contractors, partners, or intermediaries under the company's direct control.
- 2.6 Procurement processes must be transparent, honest, legal, and in compliance with government regulations and the company's procurement policies.
- 2.7 Directors, executives, and employees must avoid transactions related to themselves that may create conflicts of interest with the company. Their duties and positions must not conflict with the company's interests. Business operation decisions must be for the company's best interest. All actions and decisions by directors, executives, and employees at all levels must be transparent, honest, legal, and comply with government regulations, the Stock Exchange requirements, and the Securities and Exchange Commission's disclosure rules for related transactions, and the company's regulations.
- 2.8 The hiring of government officials must be transparent in selecting personnel who are or have been government employees, following the company's criteria and relevant laws, to prevent such hiring from being a reward for obtaining any benefits. Information about hiring government employees must be disclosed to the public for transparency and accountability.

### 3. Implementing the Anti-Corruption Policy

- 3.1 Communicate the anti-corruption policy and guidelines to directors, executives, employees, representatives, consultants, brokers, contractors, and partners for implementation through designated channels.
- 3.2 Establish transparent and accurate financial reporting processes, along with appropriate and effective internal control systems, to prevent any improper conduct.
- 3.3 Establish recruitment, promotion, training, and performance evaluation processes that reflect the company's commitment to anti-corruption measures.
- 3.4 Ensure that employees who refuse to engage in corruption are not demoted, penalized, or otherwise negatively impacted, even if such actions result in the company losing business opportunities.
- 3.5 Individuals who engage in corruption are considered to have violated the company's code of conduct and will be subject to disciplinary action in accordance with the company's regulations. If the actions are illegal, they may also face legal penalties.
- 3.6 Provide safe and accessible channels for employees and others to seek advice on complying with the anti-corruption policy and to report misconduct or file complaints. Ensure that whistleblowers are appropriately protected and appoint individuals responsible for investigating and following up on all reported matters.

### 4. Reporting Misconduct or Complaints

If anyone has information about corruption, legal violations, business ethics breaches, or observes deficiencies in the company's internal control system that may pose risks or cause damage to business operations, they can report directly to the Chairman, Chairman of the Audit Committee, Independent Directors, and/or Audit Committee through one of the following methods:

- Send a letter by mail to the company's address at 92 Soi Thientalay 7 (4<sup>th</sup> Intersection), Bangkhunthien-Chaitalay Road, Samaedam, Bangkhunthien, Bangkok 10150
- Send an email to the company secretary at Email: [cs@smpcplc.com](mailto:cs@smpcplc.com)

The report or complaint must use polite language and should include details.

Information obtained from whistleblowers will be kept confidential and not disclosed to unrelated parties, except when necessary for investigation, prosecution, testimony, or cooperation with the court or authorized government agencies.