

Anti – Bribery and Anti – Corruption Policy

Stecon Group Public Company Limited and its affiliates

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1. Introduction

Stecon Group Public Company Limited and its affiliates adheres to the fairness and transparency of business operation that complies with law, rule, regulation, announcement, order and regulation and be related to business operation as well as strictly considers to all groups of stakeholders. The company has established an anti-bribery and anti-corruption policy as a guideline for the duties of the company's directors, executives, employees, including subsidiaries or other companies under the company's control. Additionally, the company has communicated this policy to stakeholders to ensure their understanding of the company's approach.

Aniti – Bribery and Anti - Corruption policy

The Company's directors, executives and employees of Stecon Group Public Company Limited and its affiliates must strictly comply with anti – Bribery and anti - corruption policy in order to ensure that they will accomplish their duties with integrity and refrain from direct and indirect bribery or corruption of all sorts. The company has emphasized the policy across all areas of the company's operation, as well as to comply with the applicable laws, regulations, notifications, ruling and requirements relevant to business operation. In this regard, the company will not penalize those who refuse to take bribery or corruption although such action would cause the company to lose business opportunity

2. Definition

The company has declared the definitions that explain the Anti-Bribery and Anti-Corruption Policy as follows;

Fraud refers to the exploitation of unlawful benefit for oneself or another person or the company.

Corruption refers to the abuse of authority and duty to obtain undue benefit for oneself or other or the company in any form by proposing, promising, committing, demanding, giving or receiving money or property or any other benefit that is not valid to a government office, private agencies or persons with duties, whether directly or indirectly leading to cause such person to act or omit to perform their duties or obtain or maintain improper business interests.

Bribery means giving or receiving property or any other benefit to incentivize a person to act, do not act or commit act that is not in accordance with their duties.

Hospitality Expenditures refers to the cost used to welcome or certify those who come into contact with the Company on various occasions as customary, tradition or social etiquette that should be followed, such as the cost of food, accommodation, hospitalization (such as transportation fares, visiting cost, etc.).

Gifts means money or something that can be exchanged for cash (e.g. gift cards, gift vouchers, gift checks, etc.) or goods or privilege (e.g. discounts, giveaways, etc.) that are given between

the Company and those who contact the Company in accordance with the hospitality, customs, traditions, or social etiquette that should be observed, such as gifts, Gift baskets, flower baskets, calendars, stationery, sample products, souvenirs, etc.

Charitable Contributions means the donation of money or other goods or any other benefits to serve the charitable purpose for the support of society, religion and education such as donating money or goods for disaster victim, donations to the Foundation, Donation of food for underprivileged student, etc.

Political Contributions refers to assistance, whether financial or otherwise, to support political activity. Financial aid can include providing loan as for other forms of assistance such as providing goods or services, advertising promotion or supports political party, purchasing ticket to event organized to raise fund or donations to organizations with close ties with political parties. Moreover, Giving employees the opportunity to take unpaid leave from their employers or represent a joint company involved in political campaigns is also included in the meaning of political contributions.

Government official means government official within the meaning set forth in the Law on Prevention and Suppression of Corruption, employees of state enterprises, agents, or any other person representing the following agencies:

- Ministries, departments, departments, or government agencies (e.g. Customs Department, Immigration Office, etc.)
- International organizations (e.g., the World Bank, International Monetary Fund, etc.)
- Political party-Political office holders or candidates (both government and opposition)
Local Executives
- Regulatory authority (e.g. Securities and Exchange Commission; Bank of Thailand, The Stock Exchange of Thailand etc.)
- State-owned enterprise or other companies or organizations owned or controlled by the State or government agency.

3. Procedures

The Company has established guideline related to matter with a high risk of fraud, corruption and giving or accepting bribes to make directors, executives and employees including subsidiaries or other companies under the control of the Company, perform their duties with caution as following

3.1 Gifts

Receiving or giving gift on behalf of the Company to person related to the Company's business, tradition or social etiquette that should be observed as a congratulation or a show of hospitality or as a souvenir on such occasion must comply with the law, strictly established rule and policy in order to

ensure that receiving or giving gift does not cause a conflict of interest, do not obtain leniency, neglect or remuneration in business agreement or improper business operation. It does not lead to corruption.

3.2 Charitable Contributions

Charitable donations to various agencies must be carried out in a transparent manner, not contrary to moral, ethic, legality, and strictly in accordance with the Company's policy and procedure in such matters. However, it must be approved by the parent agency before proceeding.

Charitable donation is include providing financial support to these agencies. It must not cause a conflict of interest both personally and in the interests of the Company. It is not used as an excuse for corruption.

Approval of charitable donations or grants must be strictly complied with the followed procedure. A report with supporting document is prepared to consider and approve charitable donation and sponsorship as well as it is proposed for approval to the management for consideration.

3.3 Political Contributions

The company conducts business in a politically neutral manner. No political assistance or political support was provided to political party or politician in any form, including not encouraging directors, executives or employees to participate in any political activity on behalf of the Company.

The Company considers personal rights and freedom according to the law. However, they must not impersonate their employees or use any company's asset to support political activity or do any act that creates a misunderstanding that the company is involved in or provides any political support.

The expression of political opinion in the Company's office or unit area is considered an offense according to the Company's regulation.

3.4 Hospitality Expenditures

In certification related to the Company's business operation to individual or agency that incurred certification fee must be transparent. It is verifiable in accordance with relevant rules and regulation and is intended to build a good relationship or an expression of social etiquette. It does not cause conflicts of interest, does not cause leniency, neglect or remuneration in business agreement or improper business operation and does not lead to fraud and corruption.

Approval of certification fee must strictly comply with the procedure. A report with a supporting document is prepared for consideration and approval and proposed for approval to the management for consideration in strict accordance with the regulation set by the Company.

3.5 Risk Assessment: Bribery and Corruption

If an act that falls under the category of corruption is found. Corruption and Bribery must be notified to the supervisor, or the channel designated by the Company for complaint, finding clues of corruption and giving or accepting bribes or other violation of right. The company has measured to protect complainant, whistleblower and informant as prescribed. Details are in accordance with the

whistleblowing policy and whistleblower protection measure. The Company provides channel for whistleblowing and complaint to

Audit Committee

Address: Stecon Group Public Company Limited

32/59-60 Sino-Thai Tower, 29th-30th Floor, Sukhumvit 21 Road (Soi Asoke)

Khlong Toei Nua, Wattana, Bangkok 10110

e-mail address: auditcommittee@stecongroup.co.th

Phone: 02-610-4900 Ext. 1530

Clue, complaint and suggestion will be considered and acted upon as appropriate. There is a process to take action when receiving a whistleblower or complaint and measures to protect whistleblower and complainant as following

Whistleblowing Procedure

1. The Secretary of the Audit Committee collects and verifies the accuracy and adequacy of information and facts. If it is found that the act is already an offense, the preliminary action guideline will be presented to the Audit Committee.
2. The Audit Committee will consider the complaint submitted by the Secretary of the Audit Committee and will proceed by appointing a working group or assigning a person to carry out the complaint. The appropriateness is considered on a case-by-case basis.
3. Working Group or Designated Person will consider the guideline for investigating and suppressing the offense and mitigate the damage to those affected, taking into account all the overall suffering and reporting directly to the Audit Committee.
4. When the process is completed. The working group or the assigned person must report the conclusion to the Audit Committee and the Secretary of the Audit Committee as well as notify the whistleblower or complainant if they disclose themselves and collect relevant information confidentially.
5. If the matter has an impact on the corporate image or is related to senior management or is a significant issue for the Company's business operation. The Audit Committee will consider and present the conclusion to the Board of Directors.

The Measure to protect whistleblower

1. Whistleblower, complainant or person who cooperate in investigating the fact. He/she can choose not to reveal yourself, if it is deemed that the disclosure will cause any unsafety or damage but if there is self-disclosure then the company can report the progress, clarify the fact, or mitigate the damage more conveniently and quickly.

2. The Company will consider the information of the whistleblower, complainant or person who cooperates in investigating the fact including confidential related information. Disclosure will be made with care and sparingly as well as take into account the safety and damage of the whistleblower, complainant or person who cooperates in investigating the fact, source of information or related person.
3. In cases where whistleblowers, complainants, or those cooperating in fact-finding investigations feel that they may face safety risks or potential harm, they may request the company to implement appropriate protective measures. The company may also establish protective measures without a request if it is deemed that the situation presents a likelihood of harm or safety concerns.
4. Those who suffer from damage will be remedied, mitigating damage with appropriate and fair process.

3.6 Risk Assessment: Bribery and Corruption

The Risk Management and Sustainability Department is required to responsible for assessing the risk of bribery and corruption at least once a year by assessing, analyzing, monitoring, and controlling the risk of corruption to an acceptable level together with reporting to the Risk Management and Sustainable Development Committee including monitoring the implementation of the anti-bribery and anti-corruption policy.

3.7 Creating awareness of anti - bribery and anti - corruption

The Company conducts internal communication so that the Company's directors, executives and employees can understand and realize the importance of anti - bribery and anti-corruption. The Company will also disclose to stakeholders about the Company's related policy and practice through employee meeting, training, seminar and various media.

3.8 Penalty for offense

Punishment for offenses must be in accordance with the Company's regulations and/or relevant law.

This Anti-Corruption, Corruption, and Bribery Policy was approved by the Board of Directors' Meeting No. 2/2024 on February 27th, 2024 and be effective from February 27th, 2024 onwards.

Promulgated on 27th February 2024

(Mr. Vallop Rungkijvorasathien)

Chairman of the Board of Directors
Stecon Group Public Company Limited