

## Anti-Corruption Policy

Amata VN Public Company Limited is well aware that corruption not only affects to the business operations but reputation and image of the Company. It is also a great obstacle to the sustainable growth of the organization and the development of the nation. Amata VN Public Company Limited, associated companies, subsidiaries and affiliates (the Company) are strictly adhere to relevant rules and regulations and adhere to conducting business with honesty, transparency, morality, ethics and responsibility to stakeholders along with the guidelines that are consistent with the principles of good corporate governance and the Company's business ethics which defines the scope of behavior standards that all employees of the company including Directors, Executives and Employees should act in business operations and performance as well as encouraging stakeholders throughout the supply chain to operate in the same direction to create a good business environment which is an important foundation for sustainable business operations.

To achieving such results in a tangible way, the Company therefore shows its intention to be a Collective Action Coalition against Corruption in Private Sector and cooperates with all sectors both domestically and internationally to create transparent, fair and against all forms of corruption (zero-tolerance) business standards by establishing an "Anti-Corruption Policy" as a guideline for all employees to adhere in the same way under the framework of ethics and honesty as well as relevant stakeholders to acknowledge the Company's intentions and business practices.

### DEFINITION

**Corruption** refers to actions in various forms based on position unlawful or immoral duties and powers including both direct and indirect bribery. Whether in any form, such as accepting, demanding, soliciting, including giving, offering, promising to give property or benefit other government officers or private agencies together with the hope of persuading them to commit or omit certain acts that are unjustified by their duties in order to obtain the benefit of the business itself or those involved unfairly and cause damage to the interests of others. Unless in the case of laws, rules, regulations, local traditions or trade customs that allow this to be done.

**Bribery** refers to offering, promising, accepting or providing an incentive to commit an unlawful act, breach of business ethics, breach of trust or create an unfair advantage. In this regards, the incentives may be in the form of gifts, loans, fees, rewards or other benefits such as taxes, services, donations, contributions, etc.

**Charitable Contribution** refers to giving money, things or anything else of value to an entity or charitable organization, for the public without expecting a return.

**Support** refers to money, things or any other benefits given or received from customers, partners, business alliances with the purpose of business, brand, image or reputation of the Company.

**Political Contributions** refers to financial and non-monetary assistance and support to politicians, political parties or people related to politics such as money, workforces, places, equipment, other facilities, etc.

**Gift** refers to money, assets, things, services, privileges or any other benefits in both monetary and non-monetary forms that individuals give and/or receive on occasions in addition to salary, earnings and benefits from normal employment.

**Conflict of Interest** refers to situations or actions in which Directors, Executives or Employees demand personal benefits and those involved, whether by blood or any other means, which affects fair decision-making performing duties according to responsibilities and consider to the common interests of the Company.

**Facilitating Payment** refers to unofficial expenses paid to government officers, to speed up a process or spur action including enabling the payer to receive special privileges from superior service than others.

## **GUIDELINES**

The Company's Directors, Executives and Employees are prohibited from soliciting, engaging in or accepting corruption in any country and all departments in both public and private sectors in which the company's business is involved, by jointly promoting the values of honesty and responsibility as corporate culture.

The Anti-corruption policy covers the company's operations in the following matters:

- 1) The Company conducts its business with integrity and transparency and not allow or accept bribes from any person both inside and outside. In this regard, to collaborate with government officers must be in accordance with the law, related policies and guidelines.
- 2) The Company complies with laws, rules, regulations, standards, policies and guidelines, including business ethics. It must not involve directly or indirectly in all forms of fraud and corruption (zero-tolerance).

- 3) The Company arranges regular assessment and management of corruption risks including creating guidelines for mitigating impacts consistent with the risks and in accordance with the internal control system.
- 4) The Company defines practical procedures, preventive measures and measures to prevent corruption in business operations that are comprehensive and sufficient for implementation.
- 5) The Company provides orientation and training for employees and relevant stakeholders to create knowledge and understanding about the policy, measures and procedures.
- 6) The Company defines a process for conducting ethics and supervising compliance with rules (Ethic & Compliance Program), internal control system and the internal audit process to meet the requirements of regulations and standards appropriately, sufficiency and consistency as well as covering the process of record data of financial, accounting, marketing, sales, purchasing, personnel management and other processes related to the operations of the Company.
- 7) The Company provides a reporting, monitoring and reviewing the effectiveness of anti-corruption policy implementation including urgent issues encountered regularly and in a timely manner with appropriate procedures and actions.
- 8) The Company provides channels and processes for receiving complaints or whistleblowing that are appropriate and safe for the Company's employees and stakeholders who wish to seek for advice, suggestions or complaints about corruption including measures to protect whistleblowers, complainants, witnesses and information reporters.
- 9) The Company provides communication and promote awareness of anti-fraud and corruption among employees, customers, and business partners, including subsidiaries, affiliates, other companies which the Company has control and business representatives as well as external stakeholders throughout the supply chain.
- 10) The Company supports exchange knowledge and experience, and cooperate with private sector organizations, government sector and civil society both domestically and internationally against corruption.
- 11) All employees operate without or allow others to use their authority in their position to claim, negotiate, contract or take any action directly or indirectly that leads to corruption.

## **Responsibilities**

To ensure that the anti-corruption policy will be implemented throughout the organization and there is a clear oversight. The Company therefore defines the duties and responsibilities of persons or units within the organization as follows:

### **Board of Directors**

- 1) Arrange anti-corruption policies and measures that suitable to the current environment and risk factors. It should be reviewed at least once a year.
- 2) Arrange to determine the scope of anti-corruption measures that are sufficient to support and supervise the Company to take action in the connection of such measures.
- 3) Supervise business operations to comply with laws, rules, regulations, policies and relevant guidelines as well as promoting the implementation of this policy in a concrete manner.
- 4) Encourage the Management to assess the risk of corruption and allocate resources to ensure the effectiveness of risk control appropriately and adequately.
- 5) Consider reports on the anti-corruption policies and measures implementation and provide useful suggestions to the Management for development and improvement.
- 6) Consider urgent issues related to corruption to supervise the operation in a timely manner.
- 7) Avoid any activity that might lead to that situation or any suggestions that will cause a violation of this policy.
- 8) Encourage and support the Management to be aware and emphasize the prevention of conflicts of interest and integrate into the corporate culture.

### **Audit Committee**

- 1) Supervise and review the internal control system, internal audit and corruption risk assessment to be efficient and effective.

- 2) Consider reports on the implementation of anti-corruption policies and measures.
- 3) Consider urgent issues related to corruption to supervise the operation in a timely manner.
- 4) Provide channels and processes that is appropriate and safe for whistleblowing or receiving complaints, including protection measures for whistleblowers, complainants, witnesses and information reporters.

#### Corporate Governance Committee

- 1) Develop and improve anti-corruption policies and measures.
- 2) Encourage related parties to take action and comply with the scope of anti-corruption measures set by the Board of Directors.
- 3) Provide all parties with knowledge and advice on the correct, complete and clear anti-corruption policy and measures.

#### The Management

- 1) Provide procedures and anti-corruption measures that are in accordance with the policy, regulations and the laws of the country in which the business operates.
- 2) Setup an internal control system, internal audit including efficient and adequate risk management of anti-corruption.
- 3) Establish an organizational structure with roles and responsibilities clearly as well as allocate appropriate and sufficient resources to be effective in controlling the risk of corruption.
- 4) Propose urgent issues related to corruption (if any) to the Audit Committee and the Board of Directors.
- 5) Encourage subordinates at all levels aware to the importance of compliance with the anti-corruption policy and measures and integrate as a culture of anti-corruption in all forms.
- 6) Follow up, manage and encourage compliance with relevant laws, policies, measures and regulations.

- 7) Report the results of auditing compliance with the anti-corruption policy and measures to the Audit Committee. and the Board of Directors regularly acknowledge
- 8) Protect subordinates and relevant stakeholders who reject corruption even that action will cause the company to lose business opportunities.
- 9) Act as a good role model by avoiding any activity that could lead to a situation or any suggestions that will cause a policy violation.

Human Resources and Administration Department

- 1) Provide personnel management processes that reflect the Company's commitment to compliance with the anti-corruption policy and measures.
- 2) Communicate the anti-corruption policy and measures to relevant stakeholders thoroughly.
- 3) Follow up and file an Acknowledgment and comply with the anti-corruption measures Form signed by the Company's employees.

Internal Auditor / Compliance Unit

- 1) Assess and manage fraud and corruption risks as well as setup guidelines for prevention and mitigation for high-risk cases.
- 2) Define plans, procedures, and preventive measures related to corruption that covers to the process of reporting urgent issues to the Executives and the Board of Directors.
- 3) Setup a due diligence process for anti-fraud and corruption operations in projects and business activities for both the Company and stakeholders throughout the supply chain (supply chain due diligence) and business partners
- 4) Setup Ethic & Compliance Program procedures and internal controls that are appropriate and adequate to the risk of fraud and corruption that may occur.
- 5) Review the internal control system and internal auditing on corruption as well as inform and follow up with relevant agencies to make improvements regularly.
- 6) Collect and prepare reports on audit results and compliance with anti-corruption policies and measures to report to the Audit Committee.

- 7) Provide advice on anti-corruption policies and measures as well as coordinating or discussing with other departments that may be involved in providing accurate complete and clear advice.

#### Company Secretary

- 1) Coordinate and exchange knowledge with other departments to integrate and develop information with anti-corruption work.
- 2) Coordinate and communicate the scope of measures set by the Board of Directors for relevant departments to implement.
- 3) Provide information and advice on the anti-corruption policy and measures to the Board and appointed external experts.
- 4) Regularly arrange an agenda for considering the performance according to the anti-corruption policy and measures in the Board of Directors' meeting.

#### Chief Executive Officer

- 1) Promote and support anti-corruption policies.
- 2) Operate in good faith.
- 3) Avoid actions that may cause violations of the anti-corruption policy, business ethics and against the law.
- 4) Act as a good role model in compliance with policies, measures, principles of corporate governance and business ethics.
- 5) Raise awareness and foster a culture of anti-corruption by continuously communicating to employees at all levels and relevant stakeholders.

#### Employees

- 1) Learn and understand roles, duties and responsibilities of corruption risk management related to their work.
- 2) Investigate, prevent and report bribery and corruption behaviors.

- 3) Comply with the anti-corruption policy and measures, including principles of good corporate governance, business ethics and other related practices by avoiding any activity that may lead to that situation or any suggestions that would cause a violation of that policy

## **PRACTICAL MEASURES**

The Anti-Corruption measures have been established as an important guideline to prevent potential corruption risks. The Company must conduct a review, check and evaluate the effectiveness of action measures. Directors, Executives and Employees of the Company must perform their duties with prudence and caution in the following issues:

- 1) Receiving and giving gifts, welcome service or other benefits

Receiving and giving gifts, welcome service, gratuities and hospitality or any other benefits are permitted in which the value of the gift or gratuities must not exceed the limits required by law in that country and inform the stakeholders of the practical measures as well as having regular control and inspection mechanisms. To accepting and giving gifts must have the following characteristics:

- 1.1) Proceed correctly, openly, transparently, not against moral principles and obey the law, the Company regulations, including government agencies, state enterprises and other related agencies.
- 1.2) Suitable for the situation, festivals and traditions events.
- 1.3) Does not used as an excuse or a means of corruption.
- 1.4) Does not cause conflicts between personal interests and the interests of the Company.
- 1.5) Does not accept or give gifts, welcome service or other benefits in the case that those actions will affect the operations of the Company.
- 1.6) A record or register must be prepared to control the receipt or giving of gifts by specifying the purpose and person's name agencies who received or giving gift, gift value and approver clearly.

## 2) Charitable Contribution and Support

Support money, charitable donations or all kinds of support money are considered as part of social contribution activities to enhance a good image and align to the Company's objectives which must be done transparently through defined process under a strict disbursement control. The donation and support must have the following characteristics:

- 2.1) Proceed correctly, openly, transparency, not contrary to moral principles and obey the law, the Company regulations, including government agencies State enterprises and other related agencies.
- 2.2) Consistent with social, community and environmental policies or activities to promote sustainable development of the Company or is an activity that benefits to the society.
- 2.3) Does not used as an excuse or a means of corruption.
- 2.4) There are no hidden objectives to gain an advantage or create incentives for business benefits.
- 2.5) Does not cause conflicts between personal interests and the interests of the Company.
- 2.6) Prepare a record for approval by specifying the purpose and person's name, organizations that receive donations or receive support clearly with relevant documents attached, to propose to the authorized person of the Company for approval before taking action.
- 2.7) Monitors whether donations or sponsorships are used for their intended purpose.

## 3) Political Contributions and Activity

The Company provides transparent and verifiable political support without discriminating against or giving wrongful benefits to political parties or persons. Any action in connection with political activities must have the following characteristics:

- 3.1) Conducting business with political neutrality and has no policy to provide political assistance or to act in a way that is aligned with any political party or group.

- 3.2) Promote personal rights and freedoms of employees in accordance with the constitution and other related laws.
- 3.3) Employees are prohibited from using the Company's property or providing services on behalf of the Company to support political activities or take any action which leads to the understanding that the Company be affiliated with or support a political party or any political group.
- 3.4) Provide a review and audit process for political contributions.
- 3.5) Prepare a record for approval by specifying the purpose and person's name, sponsored agencies clearly with relevant documents attached, to propose to the authorized person of the Company for approval before taking action.

#### 4) Facilitating Payment

The Company does not have a policy to pay facilitation payments and does not accept any action in exchange for facilitation or creating an unfair advantage in business operations by doing the following:

- 4.1) Does not pay for convenience either directly or indirectly, or traditional payment or payment through other people, especially the payment to facilitate government officers.
- 4.2) Avoid or does not open for the opportunity to fall in a situation of facilitation payment.
- 4.3) Define procedures for approval and verification of facilitation payments.
- 4.4) Inform the supervisor when being asked for a facilitation payment to jointly find a solution.

#### 5) Employment of government officers (Revolving Door)

The Company must provide guidelines for auditing employment to prevent appointment or hiring Government officers of Thailand or any country that the Company operate its business that may lead to conflicts of interest and create fraud and corruption risks, by doing the following:

- 5.1) Does not appoint or hire Government officers of Thailand or any country that the Company operate its business who are still in position, except state enterprises that have requirements from agencies to be able to have representatives from state enterprises to work in the organization. Unless there is a reasonable cause.
- 5.2) Appointing or hiring former Government officers of Thailand or any country that the Company operate its business who retired for not less than 2 years. Unless there is a reasonable cause.
- 5.3) Provide a due diligence process for the person whom the Company will nominate to be a Directors, consultants and Executives of the Company as well as establishing guidelines to prevent conflicts of interest.
- 5.4) Establish appropriate hiring criteria including measures to disclose names and backgrounds of persons who are former government officers to be appointed or employed as personnel of the Company.

6) Recording and preservation process

Recording process and maintain the accounting and financial information of the Company must be accurate, complete, transparent and verifiable, with an internal control system and internal auditing that is efficient and reliable under the supervision of the Audit Committee. The guidelines for recording and keeping information will be in accordance with the code of conduct and corporate governance policies, relevant announcements, regulations and policies.

7) Human Resource Management

Provide a human resource management process that reflects the commitment to the implementation of the anti-corruption policy and measures which covering to recruitment, selection, training, performance appraisal, transfer, promotion, compensation and benefits in various forms, termination of employment and retirement.

## 8) Communication and Training

### 8.1) Communication

- 8.1.1 Arrange for the communication of anti-corruption policies and measures to those involved in acknowledgment, consisting of Directors, Executives, Employees, subsidiaries, associated companies, other companies which the Company has control, business representatives and trading partners as well as evaluating the effectiveness and integrate the results to improve continuously.
- 8.1.2 Arrange for the communication of penalties in case that non-compliance with the anti-corruption policy and measures, including communicating the policy on not demoting, penalizing, or giving negative effects to Directors, Executives, and Employees who reject corruption even such actions will cause the Company to lose business opportunities to Directors, Executives and Employees.
- 8.1.3 Arrange disclosure of information about anti-corruption policies and measures to a public.

In this regard, to prepare or revise relevant policies and measures, there must be communication and disclosure of information through appropriate communication channels such as letters, e-mail, websites, publications, publicity plaques, etc.

### 8.2) Training

- 8.2.1 Provide orientation and training on anti-corruption policies and measures for Directors, Executives and Employees at all levels regularly.
- 8.2.2 Encourage Directors and Executives to participate in raising awareness among Employees to be a good role model in compliance with the anti-corruption policy and measures.

### 8.3) Getting Advice

In case that Directors, Executives, Employees or stakeholders have queries about the anti-corruption policy and measures. They can inquire or obtain preliminary advice via:

- Company Secretary and Legal Department
  - telephone: (02) 792-0000
  - Tel: (02) 792-0000
  - Email: [cs@amata.com](mailto:cs@amata.com)
  - post office: Company Secretary and Legal Department  
Amata VN Public Company Limited  
2126 Kromadit Building, 2nd floor  
New Phetchaburi Road, Huai Khwang District  
Bangkok 10310

## **PENALTY**

Anti-corruption Policy consider to be a part of work discipline. Directors, Executives and Employees who fail to comply will be investigated and subject to disciplinary action in accordance with the Company's regulations, charter and related laws. This may include termination of employment. In the event of an investigation, all employees must cooperate fully with internal and external agencies.

In the same time, the company will not demote, penalize or have a negative effect on the Director, Executives and Employees who refuse to act with the intention of violating this policy even if that action will cause the company to lose business opportunities.

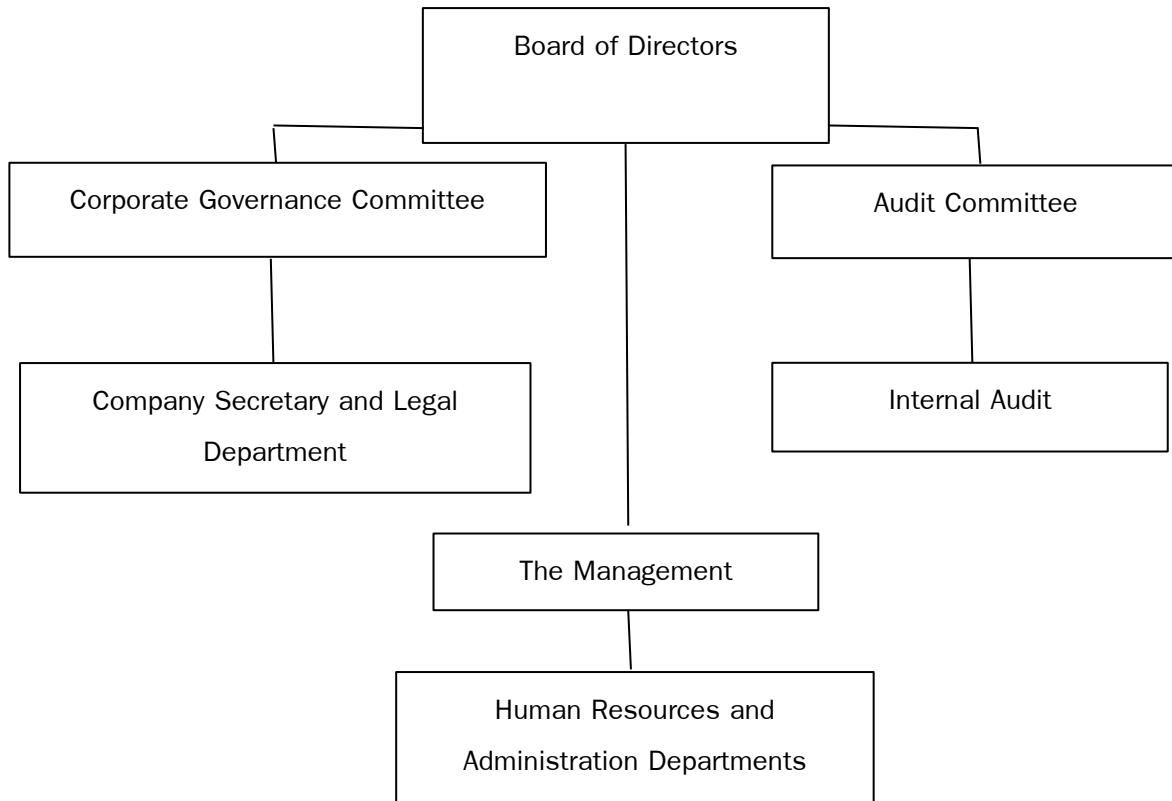
It is hereby announced for acknowledgment and general practice.

Announced on 11 September 2023

(Dr. Apichart Chinwanno)

Chairman

## ANTI-CORRUPTION RESPONSIBILITY STRUCTURE



### SCOPE OF APPLICATION

Scope of this policy application shall apply to all Directors, Executives and Employees of the Company.

### IMPLEMENTATION OF MEASURES BY INDIVIDUALS AND RELATED COMPANIES

Amata VN Public Company Limited encourages subsidiaries, associated companies, affiliates Joint Ventures, Joint Ventures and Business Partners to implement the Anti-Corruption Policy as a Guideline.