

## Anti-corruption Policy

SCG conducts its business with integrity and is committed to responsibility towards society and all stakeholders in accordance with corporate governance principles, SCG Code of Conduct, as well as its stakeholder engagement policy and guidelines. In 2012, SCG became a member of Thailand's Private Sector Collective Action Coalition Against Corruption (CAC) to demonstrate its intent and determination to combat all forms of corruption.

In order to provide clear guidelines for business operations and develop the Company into an organization of sustainability, SCG has reviewed the previously issued Anti-corruption Policy and implemented this revised Anti-corruption Policy to ensure that SCG has in place a policy that defines responsibilities, guidelines, and appropriate operational requirements to prevent corruption in all of SCG's business activities and that all decisions on business operations potentially incurring risk of corruption are considered and executed with due circumspection.

### Definition

Corruption refers to any types of bribery, whether in the form of offering, promising to give, giving, agreeing to give, requesting, or accepting money, assets, or other benefits to or from a government officer, a government agency, a private organization, or a responsible person, either directly or indirectly, in order that such person acts or refrains from acting in the exercise of his or her duties in order to obtain or retain business or recommend a specific business to the company, or obtain or retain other undue business advantages, except where such act is allowed by laws, rules, notifications, regulations, local customs, or business customs.

SCG personnel refer to directors, executives, and employees of the Company or its subsidiaries.

A subsidiary refers to a subsidiary company in accordance with the consolidated financial statements of the Company.

### Anti-corruption Policy

SCG personnel are prohibited from engaging in or accepting any form of corruption, both directly or indirectly. This shall apply to all businesses in every country and all agencies involved. Compliance with this policy shall be regularly reviewed. Relevant operational guidelines and requirements shall also be revised to ensure alignment with changes in business, rules, regulations, and legal requirements.

## **Duties and Responsibilities**

1. The Board of Directors is responsible for establishing an anti-corruption policy and putting in place effective anti-corruption systems in order to ensure that SCG personnel recognize the significance of anti-corruption efforts and cultivate an anti-corruption mindset as part of SCG's organizational culture.
2. The Audit Committee is responsible for reviewing financial and accounting reporting systems, internal control systems, internal audit systems, and risk management systems to ensure their compliance with international standards as well as their prudence, suitability, currency, and effectiveness. The Audit Committee is also in charge of handling submission of information regarding corruption involving SCG personnel, conducting fact-finding investigations, presenting the matter to the Board of Directors to determine disciplinary action or solutions, as well as giving consultation and ensuring compliance with this Anti-corruption Policy.
3. SCG's President, Management Teams, and executives are responsible for implementing the Anti-corruption Policy by putting in place relevant systems and promoting the policy as well as communicating it to all employees and related parties. They are also charged with reviewing the suitability of relevant systems and guidelines to ensure alignment with changes in business, rules, regulations, and legal requirements.
4. The Internal Audit Director is responsible for reviewing risk assessment and offer recommendations on the formulation of corruption risk prevention procedures and approaches to present to the Audit Committee and the Board of Directors. The Internal Audit Director is also responsible for auditing and reviewing operations to ensure their compliance with policies, guidelines, authority, procedures, laws, and requirements of regulatory agencies and make certain that SCG's control systems are suitable, prudent, and sufficient for combating corruption and handling potential corruption risks. Outcomes of such audits and reviews shall be reported to the Audit Committee.

## **Anti-corruption Guidelines**

1. SCG personnel shall follow the Anti-corruption Policy and SCG Code of Conduct and avoid any direct or indirect involvement with corruption.
2. SCG personnel shall not neglect to take action upon detecting an act involving SCG that can be construed as corruption. It is their duties to notify their supervisors or responsible persons of such incident and give full cooperation in the fact finding investigation. Should there be any inquiries or questions, they may consult their supervisors or persons designated to oversee compliance with SCG Code of Conduct through various channels provided.
3. SCG shall ensure fairness and provide protection to SCG personnel who refuse to engage in corruption or report corruption cases related to SCG through a protection procedure which is intended for those who follow the Anti-corruption Policy, file complaints, or cooperate in reporting corruption as defined in the Whistleblowing Policy.
4. SCG recognizes the importance of educating and fostering an understanding among third parties whose duties involve or may impact SCG on matters where compliance with the Anti-corruption Policy is required.
5. SCG strives to foster and maintain an organizational culture with zero tolerance against corruption in transactions with both public and private sectors.
6. SCG's Risk Management Committee is responsible for preemptively assessing potential corruption risks. The Internal Audit Office has put in place appropriate and efficient audit processes and internal control systems for processes, finance, accounting, record keeping, and others, which are subject to regular review.
7. SCG shall comply with laws related to anti-corruption in Thailand and every country where it conducts business.
8. SCG shall consider taking appropriate action to ensure that its agents, contract counterparties, or any person acting on behalf of SCG are informed of the principles set forth in this Policy.

## **Rules of Practice**

1. This Anti-corruption Policy shall also apply to human resource processes, including nomination or selection, promotion, training, evaluation, and remuneration. Supervisors at all levels shall communicate the policy to staff so that they can apply it to business activities within their scope of responsibility and supervise its implementation to ensure efficiency.
2. Any implementation of the Anti-corruption Policy shall be in compliance with guidelines set forth in SCG Code of Conduct, SCG Corporate Governance Principles, stakeholder engagement policy and guidelines, as well as relevant rules and operational handbooks, and additional guidelines to be formulated in the future.
3. To ensure clarity regarding activities involving high risks of corruption, SCG personnel shall exercise caution and comply with SCG Code of Conduct and guidelines as follows:
  - 3.1 Gifts and Hospitality  
Any offering or accepting of gifts and hospitality shall comply with SCG Code of Conduct.
  - 3.2 Donations or sponsorships  
Any offering or accepting of donations or sponsorships shall be transparent and legal. It must be made certain that such donations or sponsorship shall not be used as a pretext for bribery.
  - 3.3 Facilitation Payment  
All facilitation payment to government employees is prohibited.
  - 3.4 Political Contributions
    - (1) SCG shall maintain political neutrality and shall not act in the interest of or provide financial or other support to political parties, political coalitions, political figures, or political candidates, either directly or indirectly, either at the local, regional, or national level.
    - (2) SCG personnel shall strictly comply with SCG Code of Conduct in relation to political action.
  - 3.5 Hiring of government employees (Revolving Door)  
The hiring of government employees who may create a conflict of interest is prohibited.
  - 3.6 Business relations and procurement with the government  
Any offering or accepting of bribery is prohibited in all business activities. Any dealing with the government shall be transparent, honest, and in compliance with relevant laws.

## **Communication and Training**

1. SCG shall communicate and disseminate the Anti-corruption Policy to SCG personnel through various channels, such as orientation for new directors and employees, training sessions or seminars, as well as internal public relations within SCG's workplaces and electronic systems. SCG shall also periodically communicate to SCG personnel various forms of corruption, risks of being involved in corruption, and how to submit information. This is to ensure that SCG personnel acknowledge and implement the policy.
2. SCG shall communicate and disseminate the Anti-corruption Policy as well as SCG's whistleblowing channels to the public, subsidiaries, associates, and stakeholders via various channels, such as websites, annual reports, and annual registration forms, to foster an understanding and support anti-corruption efforts.
3. SCG personnel who have any inquiries about this policy may consult their supervisors, secretary to the Audit Committee, or the Internal Audit Director.

## **Disciplinary Action**

SCG personnel who fail to comply with this policy are subject to disciplinary action and may also be subject to legal punishments if they commit an offense under the law.

## **Whistleblowing Measures and Channels**

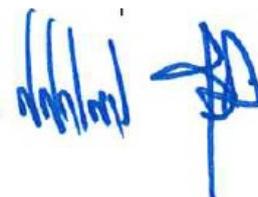
SCG has established mechanisms for whistleblowing, complaint handling, and the processing of cases related to violation of laws, rules, and SCG Code of Conduct or to behavior of SCG personnel that may be suspicious of corruption. SCG has also prescribed appropriate whistleblower protection measures according to the Whistleblowing Policy to provide a clear guideline and enhance the efficiency of complaint handling.

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This Anti-corruption Policy was revised according to the resolution of the Board Meeting on 31 March, 2021 and effective from 1 April, 2021 onwards.

Announced on 31 March, 2021,

Air Chief Marshal



(Satitpong Sukvimol)

Chairman of the Board of Directors